

Information on selected processing of personal data by the Companies of the CPIPG

Below you will find information on the processing of personal data by the companies of CPIPG (the “CPIPG Companies”) provided in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the “Regulation”) and other related laws and regulations governing the protection of personal data. The CPIPG Companies, as personal data controllers, processes personal data as described further in this document.

Processing of Personal Data

The personal data is processed by the CPIPG Companies only to the extent necessary and for the time necessary to achieve a particular purpose.

1. Purposes of processing	Conclusion and performance of lease agreements.
Processing purpose’s description	Keeping records of tenants and contact persons, signing of contracts and maintaining the register of contracts, communicating with tenants and obtaining feedback, maintaining the register of powers of attorney, bookkeeping, invoicing, collecting reports and turnover data, processing bank statements, maintaining the registers of bank guarantees, deposits and insurance contracts, receivables management, received mail records, registration of car registration plates of tenants, keeping records of tenants' training.
Legal basis	The legitimate interest of the parties or an agreement with the data subject.
Categories of personal data	Contact details, bank details, identification details for signing contracts, attendance sheets from training.
Categories of personal data subjects	Employees of tenants, tenants' representatives, employees of CPIPG Companies, employees and representatives of insurance companies and bank guarantees providers.
Source of personal data	The other contracting party.

Categories of personal data recipients	CPIPG Companies, property managers, and other companies providing services related to the particular real estate property.
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Duration of personal data storage	For the duration of the lease agreement and subsequently for 10 years to defend legal claims. Accounting documentation - for 10 years from issuing a document. For Hungarian companies for 8 years.
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2. Purposes of processing	Management and use of the database of existing and future tenants and business partners in information systems.
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Processing purpose's description	Regular communication with tenants and business partners.
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Legal basis	The legitimate interest of CPIPG Companies or subject consent granted.
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Categories of personal data	Name, surname, phone number (mobile), email, position, company name, postal address.
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Categories of personal data subjects	Employees and statutory representatives of tenants/business partners.
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Source of personal data	The other contracting party.
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Categories of personal data recipients	CPIPG Companies, property managers and other companies providing services related to the particular real estate property.
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Duration of personal data storage (as long as at least one of the following options is valid)	<p>In the case of existing tenants and business partners, for the duration of the contract, and subsequently for a period of 10 years.</p> <p>In the case of future tenants, for the duration of the so-called HOT-Lease (preliminary agreement on basic lease conditions), and subsequently for 10 years.</p> <p>If consent is granted for the duration of the consent.</p> <p>In other cases (no contract is signed, no consent is given) for the duration of the negotiation of the contract with</p>
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potential tenants/business partners, and subsequently for 5 years.

3. Purposes of processing

Tenders, conclusion and fulfilment of supply contracts.

Processing purpose's description	Identification of potential services or products suppliers, sending a request, collecting offers from suppliers, contract negotiation, signature and contracts records, keeping records of suppliers and their contact persons, communication with suppliers and receiving feedback, evidence of invoices, evidence of full powers, management of received mail.
Legal basis	The legitimate interest of CPIPG or an agreement with the data subject.
Categories of personal data	Contact details, education, bank details, identification data for signing the contract.
Categories of personal data subjects	Employees and representatives of suppliers, employees of CPIPG Companies.
Source of personal data	The other contracting party, commercial register.
Categories of personal data recipients	CPIPG Companies, property managers and other companies providing services related to the particular real estate property.
Duration of personal data storage	Contractual documentation - for the duration of the contract and subsequently for 10 years to defend legal claims. Accounting documentation - for 10 years after document issue. For Hungarian companies for 8 years. For 5 years after the end of the selection process in case a vendor is not selected.

4. Purposes of processing

Provision of public wi-fi.

Processing purpose's description	Providing Internet access to visitors.
Legal basis	The legitimate interest of CIPG Companies to operate a public wi-fi network.
Categories of personal data	Name, surname, email, identification and technical addresses of the connected device (IP address, MAC address, IMEI, UDID, etc.).
Categories of personal data subjects	Visitors.
Source of personal data	Connected devices.
Categories of personal data recipients	External provider of connection.
Duration of personal data storage	Maximum of 30 days.

5. Purposes of processing

Events, competitions and loyalty programs organization, newsletters distribution.

Processing purpose's description	Keeping records of existing and potential customers for the communication purposes, offering products, presentations of shopping centre, discounts and offers.
Legal basis	Subjects consent granted, an agreement with the data subject or legitimate interest of a controller.
Categories of personal data	Name, surname, title, email, phone, address, age, date of birth, gender, location, audio video records or events photos.
Categories of personal data subjects	Visitors, event participants, suppliers, subscribers, persons under 15 years, contractors, tenants' employees.
Source of personal data	Physical persons.

Categories of personal data recipients	CPIPG Companies, property managers and other companies providing services related to the particular real estate property.
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Duration of personal data storage	For consent period, 3 years from the event date.
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6. Purposes of processing

Operation of the CCTV system.

Processing purpose's description	Recording footage from cameras installed for security reasons.
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Legal basis	The legitimate interest of CPIPG Companies in the protection of property and physical persons health.
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Categories of personal data	Video recordings of people and vehicles in the areas monitored by CCTV.
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Categories of personal data subjects	Visitors, employees, and other persons.
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Source of personal data	CCTV system.
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Categories of personal data recipients	CPIPG Companies, property managers, and other companies providing services related to the particular real estate property.
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Duration of personal data storage	Maximum of 7 days. Maximum of 30 days for companies in Romania.
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7. Purposes of processing

Registration of accesses via reception, building and parking space access systems.

Processing purpose's description	Evidence and control of access to internal premises and parking spaces or garages of the CPIPG Companies.
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Legal basis	The legitimate interest of CPIPG Companies in the protection of property and physical persons health.
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Categories of personal data	Name, surname, technical ID of access cards, car registration ID, address, personal document number.
Categories of personal data subjects	Visitors, employees and other persons.
Source of personal data	Physical persons.
Categories of personal data recipients	CPIPG Companies, property managers, and other companies providing services related to the particular real estate property.
Duration of personal data storage	6 months form data recording. For Hungarian companies: 24 hours after leaving the premises.

8. Purposes of processing Conclusion and processing of Agreements with Customers.

Processing purpose's description	Communication with customers, processing of demands, conclusion and processing of contracts and orders, invoicing, receivables management, issuing of delivery notes, bookkeeping, processing of bank statements, registration of contact persons, keeping of received mail.
Legal basis	The legitimate interest of the parties or an agreement with the data subject.
Categories of personal data	Contact details, bank details, identification details for signing contracts and orders.
Categories of personal data subjects	Customers and their statutory members and employees.
Source of personal data	The other contracting party, commercial register.
Categories of personal data recipients	CPIPG Companies.
Duration of personal data storage	For the duration of the agreement and subsequently for ten years to defend legal claims.

In other cases (no contract is signed) for the duration of the negotiation of the contract with potential business partners, and subsequently for five years.

9. Purposes of processing

Keeping Land Records.

Processing purpose's description	Keeping records of existing lease contracts, easements, purchase contracts for land, related payments, registration of contact persons.
Legal basis	The legitimate interest of CPIPG Companies.
Categories of personal data	Contact details, identification details for signing contracts, bank details.
Categories of personal data subjects	Contract partners, landowners and users who are adjacent to the registered land.
Source of personal data	The other contracting party, real estate register.
Categories of personal data recipients	CPIPG Companies.
Duration of personal data storage	<p>For the duration of the agreement and subsequently for ten years to defend legal claims.</p> <p>Purchase contracts of a property nature and of serious importance shall be kept permanently as archival records.</p> <p>In other cases (no contract is signed) for the duration of the negotiation of the contract with potential business partners, and subsequently for five years.</p>

10. Purposes of processing

Conclusion and performance of real estate sale contracts.

Processing purpose's description	Keeping records of sold properties owners and contact persons, signing and registration of contracts, communication with property owners, fulfillment of obligations arising from sales contracts.
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Legal basis	The legitimate interest of the contracting parties or contract with the data subjects where applicable.
Categories of personal data	Identification personal data in contracts: name, surname, title, date of birth, personal ID number (only for older contracts), permanent address. Contact details: name, surname, address and property identification, telephone number, e-mail address.
Categories of personal data subjects	Property owners and their representatives.
Source of personal data	Data subjects or their representatives.
Categories of personal data recipients	CPIPG Companies. Persons (legal and physical) providing client service (including complaints settling) to property owners.
Duration of personal data storage	For the duration of the warranty period and thereafter for ten years to defend legal claims.

11. Purposes of processing	Website management.
Processing purpose's description	The collection of certain personal data through the use of cookies and other technologies.
Legal basis	The legitimate interest of CPIPG Companies in improving the performance and effectiveness of the website and conducting analytics related to website traffic and visitor preferences; consent of website visitors.
Categories of personal data	IP address, device type and its unique identification number, browser type, operating system, geographical location (e.g. country), unique ID assigned by the third party technology provider and other technical data.
Categories of personal data subjects	Website visitors.
Source of personal data	The end device of the website visitor.

Categories of personal data recipients	CPIPG Companies. Companies providing analytical and marketing services.
Duration of personal data storage	The duration is listed on the individual website.

12. Purposes of processing **Information about offers and sales of real estate in the projects of CPIPG Companies on the basis of inquiries from interested parties.**

Processing purpose's description	Sending offers, communicating with interested parties, processing enquiries, keeping records of interested parties and contact persons.
Legal basis	The legitimate interest of CPIPG Companies.
Categories of personal data	Name, surname, property identification, phone number, e-mail address.
Categories of personal data subjects	Those interested in sending offers and information about real estate.
Source of personal data	Data subjects or their representatives.
Categories of personal data recipients	CPIPG Companies. Providers (legal and natural persons) providing cloud services and client service to property owners.
Transfer of personal data to third countries	Personal data collected in the framework of the enquiry procedure may be transferred to third countries via cloud and related service providers (subcontractors) located in a third country. Where such transfers involve countries for which an adequacy decision has not been issued by the European Commission, the CPIPG shall use the standard contractual clauses issued by the European Commission (Decision (EU) 2021/914) to ensure appropriate safeguards for international transfers of data.
Duration of personal data storage	For the duration of the offer.

Additional information related to the processing of personal data including, amongst other things, a list of rights in relation to the processing of personal data, the manner in which such data are processed and contact details of the CPIPG Companies' Personal Data Protection Officers are listed in the CPI Privacy Policy located here: <https://cpipg.com/data-protection-policy-en>.