PRIVACY POLICY FOR THE VISITORS OF REALMONITOR.EU WEBPAGE

Effective from 1st of September 2022.

I. INTRODUCTION

REALMONITOR Ltd. (hereinafter: "Data Controller") hereby informs the visitors of realmonitor.eu webpage (hereinafter referred to as "Data Subjects") in relation to the processing of their personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as "GDPR") when visiting realmonitor.eu webpage. The terms used in this privacy policy (hereinafter referred to as "Privacy Policy") are the same as those in the GDPR.

Pursuant to Article 13 and 14 of the General Data Protection Regulation (GDPR), by making this Privacy Policy, Data Controller hereby discloses the following information. The up-to-date version of this extract of Privacy Policy is available at: https://realmonitor.eu/privacy-policy

The Data Controller reserves the right to amend its Privacy Policy at any time. The amendments will be published by displaying the consolidated version.

In any case, please read the present Privacy Policy and its amendments in order to have a complete understanding of the rules governing our data management.

II. DETAILS OF THE DATA CONTROLLER

The publisher of the present Privacy Policy and the Data Controller is:

DATA CONTROLLER:

REALMONITOR Ltd.

Registered seat: H-1093 Budapest, Gálya utca 6. fszt. 1.

Central administration office: H- 1068 Budapest, Király utca 82. 4. em. 3-3A.

Company registry number: 01-09-293936

Taxation number: HU25876576

Representative: Faragó Péter József managing director

Phone: +36-(20)-565-8692 E-mail: hello@realmonitor.eu

III. INDICATION OF DATA PROCESSORS

In the course of our activity, based on a contractual relationship, we receive the services of the following data processors:

Activity	Name	Seat address	Contact details	
Web site and Server hosting provider E-mail system provider	Google Cloud EMEA Ltd.	Velasco, Clanwilliam Place, Dublin 2, Ireland	https://support.google.com/policies/contact/general_privacy_form +353 1 436 1000	
Telephone service provider	Yettel Magyarország Zrt.	2045 Törökbálint, Pannon út 1. Hungary	+36 20 930 4000 E-mail: adatvedelem@yettel.hu	

IV. DATA MANAGEMENT

The Data Controller performs the following data management activities listed below separately. For transparency purposes we are indicating the description of data processing, type of the data processed, the purpose of the data management, the legal basis, the source of the data, the recipients of the data management and the duration of data storage in a chart format re each data processing.

1. Data management related to the use of the "Contact Us" feature of the Website

When using the https://realmonitor.eu/ website, visitors to the website have the opportunity to make a direct inquiry, send us a message to request personalized information about our service. When establishing a connection, please provide your full name, e-mail address and your question, so that we can respond to you effectively. It is not necessary to provide other personal data for sending the message, however, if the visitor also records such data in the text of the request, we will handle them during the data management related to the request. The personal data you provide when using the "Contact Us" menu will be processed for the purpose of customer management and to the extent necessary for that purpose. After responding to a request, we store data for one year to ensure effective communication and customer history.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Website's "Contact Us" feature	- Name - E-mail address - Message text	Answering inquiries	Consent of data subject (Article 6 (1) (a) of GDPR)	Data subject	Server provider as a data processor Mail service provider as data processor	After responding to a request, we store the data for one year from last communication, to ensure effective communication and customer history.

2. Data processing related to inquiries to our e-mail address and telephone number displayed on the website

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The Visitor has the opportunity to contact us directly by e-mail and telephone. Requests received through these channels will be sorted based on the content of the request and the personal information provided during such contact will be handled for the purpose and to the extent necessary for customer management. After responding to a request, we store data for one year to ensure effective communication and customer history. If a customer relationship (contract) is established during the contact, we will provide a separate data management policy. The telephone calls are not recorded, however notes are drawn on the content of the enquiries, to ensure that the enquiry, to which we send a response to, can be recalled.

Description of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
Inquiries to a central email address	Name E-mail address In addition, any additional information provided in the request	Answering inquiries	Consent of the data subject (Article 6 (1) (a) of the GDPR), which is deemed to have been given by sending the message	Data subject	Server provider as a data processor Mail service provider as data processor	After responding to a request, we store the data for one year from last communication, to ensure effective communication and customer history.
Inquiries to a central telephone number	Name Phone number	Answering inquiries	Consent of the data subject (Article 6 (1)a) of the GDPR), which is considered to have been given by calling the central telephone number	Data subject	-	Incoming calls to the central telephone number will not be recorded, data management is limited to the duration of the call
Records of requests for central contact	Name Phone number Company name E-mail address	Recording inquiries and answers provided re them	Legitimate interest (Article 6 (1) (f) of GDPR), follow-up to requests and action taken on them	Data subject	CRM system provider as a data processor	After responding to a request, we store the data for one year from last communication, to ensure effective

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3. Data processing related to "Let's make a pilot" feature of the website

Realmonitor is the entry point for banks into people's housing hunting journey which always starts with the search for a property. Realmonitor provides the ultimate property searching app, whitelabeled to the bank. Please fill in the form after clicking the "Let's make a pilot" button to ask for a dedicated private pilot demo for your company.

Descriptio n of data processing	Data type	Purpose of data processing	Legal basis	Source of data	Recipients	Duration of data storage
"Let's make a pilot" feature	Name Email address Mobile number In addition, any specific requirement, we should focus on	Providing online pilot demos	Steps to be taken in order to establish a contractual relationship (Article 6 (1) b) of the GDPR)	Data subject	Server provider as a data processor Mail service provider as data processor	After responding to a pilot request, and successfully organizing the pilot call/demo we store the contact data for one year after finalization to ensure effective communication and customer history. In case the pilot call/demo is not organized eventually than we store the contact data for one year after last communication, to ensure effective communication and customer

4. Cookies:

Our website uses cookies to ensure its proper functioning and basic and convenient functions, for marketing purposes and for the production of anonymous statistics. You can reach our Cookie Policy here: <u>LINK</u>

V. <u>INFORMATION ON THE RIGHTS OF DATA SUBJECTS</u>

In relation to the present data management procedures, the Data Subject is entitled to the following rights:

- 1. Right of access to the Data Subject's personal data: The Data Subject's has the right to receive feedback from the Data Controller about whether its personal data is being processed and, if such data is being processed, the Data Subject is entitled to have access to its personal data and all the relevant statutory information. Therefore, the Data Subject has the right to contact the Data Controller and request information about data management and request access to its own data.
- 2. Right of rectification: In the event of a change in the Data Subject's data, it may at any time request rectification of its data by providing correct information.
- 3. Right to the erasure of data: The Data Subject is entitled to request the Data Controller to delete its data if the data management is no longer necessary for the purpose for which the data were recorded, if the processing is unlawful or if the deletion is required by law.
- 4. Right to restrict data management: The Data Subject's may request a restriction of data management if the data processing is unlawful or if the Data Controller no longer needs the data for the purpose of data management, but it wishes to use it for the submission of a legal claim. Restricting data management means that the data can only be stored until the restriction is lifted and can only be used to bring a legal claim.
- 5. Right to object to processing of personal data: The Data Subject is entitled to object to the processing of its personal data at any time for reasons related to its own situation. In such a case, the Data Controller will individually examine whether there is a legitimate reason justifying the need for data management.
- **6. Right to data portability**: The Data Subject is entitled to receive from the Data Controller the personal data it processes about the Data Subject, in a structured, commonly used and machine-readable format and it shall have the right to transmit those data to another controller without hindrance from the Data Controller to which the personal data have been provided. When exercising the right to portability of data, the Data Subject is entitled to request, if technically feasible, the direct transmission of personal data between controllers.
- 7. **Right to file a complaint to the Supervisory Authority**: The Data Subject is entitled to file a complaint with the Hungarian National Authority for Data Protection and Freedom of Information. (Address: H-1055, 9-11 Falk Miksa Street, Budapest, H-1363 Budapest, PO BOX 9., +36 (30) 683-5969, ugyfelszolgalat@naih.hu)

- **8. Judicial Enforcement:** The Data Subject has the right to apply to the court if it considers that the Data Controller or the Data Processor acting on its behalf or acting on its instructions manages the Data Subject's personal data in violation of the requirements for the processing of personal data.
- **9. Right to withdraw consent**: Data Subjects can express their intention of withdrawal of consent by sending an email to hello@realmonitor.eu. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

VI. DATA SECURITY

The Data Controller ensures data security. For this purpose, it takes all technical and organizational measures and establishes the procedural rules necessary to enforce the applicable laws, data and confidentiality rules. The Data Controller protects the data with appropriate measures against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against unavailability due to accidental destruction and damage and against becoming inaccessible due to a change in the technique used.

The Data Controller also provides for the enforcement of the data security rules by means of internal rules, instructions and procedural rules separate from the contents of this Privacy Policy extract. The Data Controller takes into account the state of current technology in the definition and application of data security measures and chooses a data management solution that provides the highest level of protection for personal data unless it would constitute a disproportionate difficulty.

Automated decision-making, profiling

Please note that we do not use automated decision-making or profiling.

If you have any questions about the handling of your personal information, please contact us at hello@realmonitor.eu