

# CAMPONA Shopping Centre Kft.

## Data Processing Information Memorandum



### Information on the processing of personal data by CAMPONA Shopping Centre Kft.

#### Introduction

Below you will find information on the processing of your personal data by **CAMPONA Shopping Centre Kft.**, Corporate ID No. 01-09-884746, with its registered office at 1222 Budapest, Nagytétényi út 37-43. operating the CAMPONA Shopping Centre (hereinafter the “**Company**”) provided in accordance with 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 (hereinafter the “**GDPR**”) and related applicable data protection legislation.

The Company, as a controller of your personal data, determines the means and purposes of the processing of your personal data as specified below in this document. With regard to the processing of personal data, you can also exercise the below-mentioned rights towards the Company.

You can contact the Company in writing at the address 1222 Budapest, Nagytétényi út 37-43., by phone at +36-1-225-6600, or via email at [hungary@cpipg.com](mailto:hungary@cpipg.com).

You can contact the Company’s Data Protection Officer via email at [dpo@cpipg.com](mailto:dpo@cpipg.com).

#### Processing of your personal data

The Company processes your personal data only to the necessary extent and for the period necessary to achieve a specific purpose on a lawful basis.

Below you will find an overview of the purposes for which the Company processes your personal data, including a description of the processing purpose. Each purpose of processing also includes information on:

- Lawful basis for processing of your personal data for the given purpose;
- Extent of processing;
- Source of the personal data;
- Information on who can obtain access to your personal data; and
- Information on how long the Company will store your personal data.

In case your personal data are processed on the lawful basis of legitimate interest of the Company or a third party, information on the nature of this legitimate interest is also included.

#### 1. Camera surveillance

Purpose of the processing	Operation of camera surveillance
Description of the purpose of the processing	The Company is operating a camera surveillance system within the territory of CAMPONA Shopping Centre located at 1222 Budapest, Nagytétényi út 37-43. owned by the Company (the “ <b>Shopping Centre</b> ”), as well as the parking area of the Shopping Centre for the protection of the Shopping Centre, as well as the visitors and tenants of the Shopping Centre on the basis of Act CXXXIII of 2005 on the personal and property protection, as well as private investigation activity (the “ <b>Act</b> ”). The location of the cameras is indicated in <u>Annex No. 1</u> of this memorandum.
Lawful basis	The legitimate interest of the Company for the protection of the Shopping Centre owned by the Company, as well as the visitors and tenants of

the Shopping Centre (GDPR Article 6 paragraph (1) subparagraph f)).

Category of personal data	Image of the data subject
Source of personal data	Natural person entering the premises of the Shopping Centre (including the parking area of Shopping Centre) (data subject)
Recipients of personal data	<p><b>HTPCONSULT Kft.</b> (registered seat: 1067 Budapest, Eötvös utca 44. 3. em. 25. ajtó; e-mail: htp.cons.kft@gmail.com) as the security company acting on the basis of the service agreement concluded with the Company and as the security guard under the Act is entitled to view, have access to the recording taken of the data subject as data processor.</p> <p>CPI Hungary Kft. (registered seat: 1139 Budapest, Váci út 99-105 Balance Hall. 6<sup>th</sup> floor, phone: +36-1-225-6600, e-mail: hungary@cpipg.com) is entitled to view, have access to the recording taken of the data subject on the basis of the engagement agreement concluded with the Company as the data processor operating the Shopping Centre.</p> <p>Persons with legitimate interest shall be entitled to view, have access to the recording taken of the data subject.</p>
Storage period of personal data	7 days from the recording

## 2. Sending of newsletter

Purpose of the processing	Sending of newsletter
Description of the purpose of the processing	By sending newsletters relating to CAMPONA Shopping Centre located at 1222 Budapest, Nagytétényi út 37-43. owned by the Company (the “ <b>Shopping Centre</b> ”) to data subjects, the Company wishes to inform the data subjects about events held in the Shopping Centre, offers positively affecting customer interests, products, promotions, as well as news (the “ <b>Newsletter</b> ”).
Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject to receive Newsletter from the Company (GDPR Article 6 paragraph (1) subparagraph a)).
Category of personal data	The name, e-mail address of the data subject

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Source of personal data	All those data subjects who gave their consents to receive Newsletter from the Company
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Recipients of personal data	The Company hands over the personal data of the data subject to CPI Hungary Kft. (registered seat: 1139 Budapest, Váci út 99-105 Balance Hall. 6 <sup>th</sup> floor, phone: +36-1-225-6600, e-mail: hungary@cpipg.com) as its data processor for the operation the Shopping Centre.
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The Company hands over the personal data of the data subject to feat Kft. (registered seat: 1013 Budapest, Pauler utca 11. 2<sup>nd</sup> floor; e-mail: [hello@feat.agency](mailto:hello@feat.agency)) as its data processor to operate the Newsletter management system, including to store the personal data of the persons who signed up for the Newsletter.

Storage period of personal data	Until the data subject withdraws his/her consent, but no later than 5 years from signing up for the Newsletter (whichever takes place earlier).
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### 3. Complaint handling

#### Purpose of the processing

#### Handling of customer complaints

Description of the purpose of the processing	The Company ensures to its visitors in connection with CAMPONA Shopping Centre located at 1222 Budapest, Nagytétényi út 37-43. owned by the Company (the “ <b>Shopping Centre</b> ”) to make their comments, complaints towards the Company in person in the form of a protocol recorded via the security company in the Shopping Centre or online (e-mail to be sent to info@campona.hu).
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Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject (GDPR Article 6 paragraph (1) subparagraph a)) at the time when complaint was made to allow the Company to process the personal data of the data subject for complaint handling, answering complaints and keeping contact.
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Category of personal data	The name, address, phone number, e-mail address of the data subject
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Source of personal data	All those data subjects who submit their complaints to the Shopping Centre in person or in an electronic way.
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Recipients of personal data	The Company sends the personal data of the data subject to CPI Hungary Kft. (registered seat: 1139
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Budapest, Váci út 99-105 Balance Hall. 6<sup>th</sup> floor, phone: +36-1-225-6600, e-mail: hungary@cpipg.com), its data processor for the all-round handling of the complaint received (receiving, recording, processing, evaluating, internal assessing of the lawfulness of, accepting or rejecting the complaint, furthermore communicating the result of the assessment and making measures to avoid the same case in the future).

Storage period of personal data	Until the data subject withdraws his/her consent, but no later than 30 days calculated from the closing of the management of the complaint.
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**4. Processing of photo-, video recordings taken at event, promotion in the Shopping Centre**

<b>Purpose of the processing</b>	<b>Processing of photo-, video recordings taken at event, promotion</b>
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Description of the purpose of the processing	The Company occasionally organizes events, promotions (together the “ <b>Events</b> ”) for the visitors of CAMPONA Shopping Centre located at 1222 Budapest, Nagytétényi út 37-43. owned by the Company (the “ <b>Shopping Centre</b> ”). During the Events photos, video recordings are taken (together the “ <b>Recordings</b> ”). The Recordings are used by the Company for marketing purposes to promote the Shopping Centre. Image of the persons attending the Events are recorded on the Recordings.
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Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject (GDPR Article 6 paragraph (1) subparagraph a)). By attending the Events, the data subject consents to the processing of his/her personal data for the purpose defined above.
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Category of personal data	Image of the data subject
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Source of personal data	Natural persons attending the Events (data subject)
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Recipients of personal data	CPI Hungary Kft. (registered seat: 1139 Budapest, Váci út 99-105 Balance Hall. 6 <sup>th</sup> floor, phone: +36-1-225-6600, e-mail: hungary@cpipg.com), data processor of the Company has access to the personal data of the data subject.
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feat Kft. (registered seat: 1013 Budapest, Pauley utca 11. 2<sup>nd</sup> floor; e-mail: [hello@feat.agency](mailto:hello@feat.agency)), data processor of the Company has access to the personal data of the data subject.

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Storage period of personal data	Until the data subject withdraws his/her consent, but no later than 5 years from taking the Recording.
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## 5. MyCampona Card

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<b>Purpose of the processing</b>	<b>Data processing relating to MyCampona Card</b>
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Description of the purpose of the processing	The Company provides MyCampona Card (the “ <b>MyCampona Card</b> ”) granting special offers in the stores and at the service providers of CAMPONA Shopping Centre located at 1222 Budapest, Nagytétényi út 37-43. owned by the Company (the “ <b>Shopping Centre</b> ”) to all those data subjects, who apply for such Family Card from the Company via the Campona mobile application of the Shopping Centre developed by the Company. The personal data of the data subject specified below are required for the activation of the MyCampona Card.
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Lawful basis	<p><u>In case of registration</u></p> <p>The freely given, specific, informed and unambiguous consent of the data subject (GDPR Article 6 paragraph (1) subparagraph a)) to the processing of the personal data for the purpose specified above granted when applying for the MyCampona Card.</p> <p><u>In case of push notifications</u></p> <p>In case the user sets that it allows the receipt of push notifications via the Campona mobile application containing the MyCampona Card, then the freely given, specific, informed and unambiguous consent of the data subject (GDPR Article 6 paragraph (1) subparagraph a)) to the processing of the personal data for the purpose specified above granted when applying for the MyCampona Card.</p>
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Category of personal data	<p><u>In case of registration</u></p> <p>Name, e-mail address of the user as the data subject, which are obligatory for the registration. Beyond that the user can optionally provide its birth date, gender, zip code, which shall only be</p>
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processed by the Company for statistical and analytical purposes.

In case of push notifications

The ID of the mobile device of the user as the data subject.

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Source of personal data

All those data subjects, who complete the MyCampona Card registration via the Campona mobile application.

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Recipients of personal data

The Company sends the personal data of the data subject to CPI Hungary Kft. (registered seat: 1139 Budapest, Váci út 99-105 Balance Hall. 6<sup>th</sup> floor, phone: +36-1-225-6600, e-mail: [hungary@cpipg.com](mailto:hungary@cpipg.com)), data processor of the Company to manage the database of the digital cardholders of the MyCampona Card.

The Company sends the personal data of the data subject to feat Kft. (registered seat: 1013 Budapest, Pauler utca 11. 2<sup>nd</sup> floor; e-mail: [hello@feat.agency](mailto:hello@feat.agency)), data processor of the Company to store the database of the digital cardholders of the MyCampona Card.

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Storage period of personal data

Until the data subject withdraws his/her consent.

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**6. WIFI**

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**Purpose of the processing**

**Statistical data**

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Description of the purpose of the processing

The Company ensures for the visitors of CAMPONA Shopping Centre located at 1222 Budapest, Nagytétényi út 37-43. owned by the Company (the “**Shopping Centre**”) to use the WIFI network of the Shopping Centre (the “**Network**”) free of charge. Use of the Network requires registration, personal data of registered users are used for statistical purposes (in particular for the assessment of visitor mix) by the Shopping Centre.

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Lawful basis

The freely given, specific, informed and unambiguous consent of the data subject (GDPR Article 6 paragraph (1) subparagraph a)) to the processing of the personal data provided when registration is made at the time of connecting to the Network for the purpose specified above.

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Category of personal data	Name, e-mail address of the data subject
Source of personal data	All those data subjects, who registered themselves in order to use the Network.
Recipients of personal data	<p>The Company sends the personal data of the data subject to CPI Hungary Kft. (registered seat: 1139 Budapest, Váci út 99-105 Balance Hall. 6<sup>th</sup> floor, phone: +36-1-225-6600, e-mail: hungary@cpipg.com), data processor of the Company to perform statistical analysis.</p> <p>Personal data of the data subject are stored and sent to the Company by ACE TELECOM Kft. (registered seat: 1037 Budapest, Zay utca 3.; e-mail: office@acetelecom.hu), data processor of the Company.</p>
Storage period of personal data	Until the data subject withdraws his/her consent, but no later than 5 years from signing up for the Newsletter (whichever takes place earlier).

**7. Receipt of parcels in case of forgotten password and left-in parcels when using a parcel locker**

<b>Purpose of the processing</b>	<b>Proof of identity and declaration of the right to dispose of the goods in the parcel locker due to a forgotten password when using the parcel locker or due to the receipt of goods left in the parcel locker after the opening hours of the subsequently defined Shopping Centre</b>
Description of the purpose of the processing	In connection with the operation of the CAMPONA Shopping Centre located at 1222 Budapest, Nagytétényi út 37-43. (the " <b>Shopping Centre</b> "), the Company provides the visitors of the Shopping Centre with the opportunity to leave their belongings in the parcel locker, which is operated by unique passwords provided by the visitors. In the event of forgotten unique passwords, the parcel locker can be opened with the assistance of the Shopping Centre's security staff. The parcel lockers will be emptied every day so the security staff guards the goods left in the parcel locker. In order to avoid any abuse of the use of the parcel lockers and to identify the lawful owner of the goods, the security staff shall take a declaration of the identity of the person concerned and of his/her right of disposal of the item(s) deposited.
Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject (GDPR)

Article 6 paragraph (1) subparagraph a)) at the time when the declaration was made to allow the Company to process the personal data of the data subject for keeping contact.

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Category of personal data	Name, ID number, address and phone number of the data subject
Source of personal data	All those data subjects, who have forgotten the unique password by them when using the Shopping Centre's parcel locker or have left their belongings in the parcel locker after the opening hours of the Shopping Centre.
Recipients of personal data	<b>HTPCONSULT Kft.</b> (registered seat: 1067 Budapest, Eötvös utca 44. 3. em. 25. ajtó; e-mail: htp.cons.kft@gmail.com) as the security company acting on the basis of the service agreement concluded with the Company and as the security guard under the Act is entitled to get to know the content of the declaration and the personal data therein of the data subject as data processor.
Storage period of personal data	Until the data subject's consent is withdrawn, but no later than 30 days from the date of the inclusion of the declaration.

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#### **Transfers of your personal data to third countries or international organisations**

The Company or the recipients to which the Company gives access to your personal data for the above stated purposes will not transfer your personal data to any third countries or international organisations.

#### **Automated decision-making**

An automated decision is a decision made by the Company or a recipient to which the Company gives access to your personal data for the above stated purpose, that is based solely on automated processing of your personal data (including profiling) and that produces legal effects concerning you or similarly significantly affects you.

The Company or the recipients to which the Company gives access to your personal data for the above stated purposes will not use your personal data for automated decision-making.

#### **What are your rights with respect to the processing of personal data?**

With respect to the processing of your personal data by the Company, you can request the Company:

- To give you access to your personal data, whereby you can obtain, in particular, information whether your personal data are processed, for what purpose, what is the scope of processed data and who has been given access to your personal data, if relevant. You can also be provided with a copy of your personal data undergoing processing;
- To rectify inaccurate or incorrect data or to complete incomplete personal data;
- To erase the personal data, e.g. if the purpose of processing ceases to apply or if your personal data are processed unlawfully;
- To restrict the processing of your personal data;



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- To data portability, which allows you to obtain personal data concerning you, which you have provided to the Company, in a structured and machine-readable format either for yourself or for another controller; and
- To make sure that you are not subject to any automated decision-making (you found out whether such decision-making takes place or not in the preceding chapter).

You can also raise an objection against the processing of your personal data, should the processing of your personal data be based on the lawful basis of legitimate interest, or to lodge a complaint with the Office for Personal Data Protection. The contact details are as follows:

### **Hungarian National Authority for Data Protection and Freedom of Information**

1055 Budapest, Falk Miksa utca 9-11.

1363 Budapest, Pf.: 9.

Phone: +36-1-391-1400

[www.naih.hu](http://www.naih.hu)

[ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

### **How you can exercise your rights?**

You can request the exercise of your rights via a written or oral request. In order to provide sufficient protection of the personal data processed by the Company and to prevent personal data misuse from taking place, the Company has introduced rules for the verification of your identity stated below.

You may request the exercise of your rights by:

#### Written request

To request the exercise of the particular right in writing, please fill in the request form available at [www.cpigroup.hu/pdf/gdpr\\_hu.pdf?v071](http://www.cpigroup.hu/pdf/gdpr_hu.pdf?v071) (CPI Property Group, Group Data Protection Policy, Appendix 2). Your signature on the request form needs to be officially certified. Depending on local law, you may be able to have your signature certified e.g. at a notary office, post office, attorney-at-law, consulate or municipal/regional authority. The signature has to be officially certified in a country where the request is submitted to the given CPIPG company in person (e.g. in hotel, office or other premises designated by the Company) or sent via mail using a postal services provider. In case of sending the request via mail using a postal service provider in the countries outside of the EEA or the European Union, you may be contacted by the Company in order to further verify your identity.

#### Oral request

You may also request the exercise of the particular right in person at the Company's registered seat. Your identity will be verified by the Company's designated employee (e.g. at a front desk), based on the submission of one of the following documents: personal ID card, passport or other document with a photo sufficiently eligible to enable your clear identification.

The exercise of your rights shall not affect the rights of third parties.

Please note that should your requests be manifestly unfounded or excessive, in particular because of their repetitive character, the Company may require a reasonable fee, not exceeding the necessary costs of the provision of the above stated information or arranging the exercising of your rights, for the purposes of responding to your request.

### **Is the provision of your personal data mandatory?**

If the Company processes your personal data based on your consent, the processing of such data is voluntary. In this case, you are not required to grant your consent and provide your personal data to the Company.

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Your consent to the processing of your personal data must be a freely given, specific, informed and unambiguous expression of your will, whereby you give the Company your permission, in the form of a statement or another evident confirmation, to process your personal data.

The Company may process your personal data based on a different lawful basis, e.g. lawful basis of performance of a contract, of compliance with a legal obligation or for purposes of the legitimate interest. In this situation, provision of your personal data is necessary, because, the Company may need such personal data e.g. to conclude and perform a contract with you or to meet legal obligations. If you decide not to provide the personal data to the Company, it would not be possible to conclude the contract or to fulfil the given legal obligations.

### **How and when can you withdraw your consent to personal data processing?**

You may withdraw the consent you have granted to the Company at any time, even before the end of the period for which it was given.

You may withdraw your consent:

- Electronically via email at [hungary@cpipg.com](mailto:hungary@cpipg.com); or
- In writing at the following address:  
1139 Budapest, Váci út 99-105 Balance Hall. 6<sup>th</sup> floor

The withdrawal of your consent shall have no impact on the processing of your personal data conducted before the withdrawal.

Annex No. 1  
 Location of cameras

