**PRIVACY NOTICE** **ON THE PROCESSING OF PERSONAL DATA AND YOUR RIGHTS**

*under Art. 13 of 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*

(hereinafter referred to as the „**GDPR**“)

In case you are providing your personal data, we as a data controller:

**HB REAVIS Construction Hungary Kft.** (registered seat: 1138 Budapest, Népfürdő utca 22. B. Ép. 3. em. company reg. number: 01-09-986093; hereinafter referred to as the “**HB Reavis**” or “**we**”),

would like to inform you about the processing of your personal data and of your rights related to the said processing.

HB Reavis is part of the HB Reavis Group, which consists of all entities consolidated under the group holding HB Reavis Holding S.A. with its headquarters in Luxembourg (hereinafter referred to as the “**HB Reavis Group**“) due to which the reference to HB Reavis Group may be found in the Privacy Notice.

**What are our purpose and legitimate interests for the processing of your personal data?**

A) Administration of construction site notice board.

B) Administration of construction log.

C) Administration of control days.

D) Evidence of construction visitors.

E) Administration of construction phone book.

**Description of our purpose and legitimate interests:**

A) At almost every construction site there is a notice board with various information regarding the progress of the construction. In some cases, personal data may be displayed on the notice board, e.g. contact data of the person responsible for a stage in construction or other things relevant to the construction.

B) Every construction has its own administration which consists of several significant documents including the construction log. Construction log also contains personal data of the persons responsible for the various stages of the construction, workers and other relevant persons.

C) At most of our constructions, we organize regular control days, which serve for many purposes including marketing, safety, administration and others. People attending these control days are mostly journalists, politicians, state or local controllers, general public and internal stakeholders. From each control day a control day report is created which contains personal data of the persons involved.

D) There are many visitors to our construction site on daily basis. Each visitor must be put into evidence so we can ensure the safety at our construction site and protect the people and the property.

E) As we have numerous contractors working at our construction site, we need to keep contact details to ensure effective communication. For this purpose, we have created a phone book filled with contact details of all contractors that had worked at any of our previous constructions or that are working for any of our present constructions.

**What is our legal basis for the processing of your personal data?**

A) We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.

B) We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.

C) We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.

D) We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.

E) We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.

**What kind of personal data do we process?**

A) Name, surname, phone number and e-mail.

B) Name, surname, phone number and e-mail.

C) Name, surname, phone number and e-mail.

D) Name, surname, phone number and e-mail.

E) Name, surname, phone number, e-mail and contact details of the contractor

**How long do we store your personal data?**

As soon as we no longer need your personal data for the processing purposes for which the personal data have been collected, we will delete them unless the statute-barred period applies. Certain details and correspondence may be retained until the time limit for claims, in respect of the pre-contractual or contractual relationship, has expired or in order to comply with regulatory requirements regarding the retention of such personal data.

**With whom do we share your personal data?**

Based on the various agreements with the third parties acting as our processors, joint controllers or separate controllers, we provide your personal data to the following companies and to the following extent:

* **MADIT INFORMATIKAI Kft.** (registered seat: 1055 Budapest, Balassi Bálint utca 9. 2. em. 2a.; company reg. no.: Cg. 01 09 172945). Name, e-mail, photo of contractor’s administrator is forwarded. Purpose: registration of the contractor’s workers to prepare their entrance cards necessary to enter into the construction site. (We forward only the administrators’ personal data; the contractor’s administrator registers the contractor’s workers into the system maintained by MADIT Informatikai Kft, where name, phot and ID card number are registered).
* **Lechner Nonprofit Kft.** (registered seat: 1111 Budapest, Budafoki út 59.; company reg. no.: Cg. 01 09 996479) – company operating the electronic construction log, obligatory based on applicable HU law. The NÜJ number (in English: login number to the construction log) of the responsible person of the contractor is uploaded to the online construction log by us. Purpose: opening contractor’s construction log in accordance with the applicable law.
* **InterProtect Security Kft.** (registered seat: 1141 Budapest, Szugló utca 132.; company reg. no.: Cg. 01 09 207705). In exceptional cases when contractors perform work during weekend, we provide the security company with the name of workers entering the construction site during the weekend. Purpose: ensure the protection of people and the property.
* **CONSULENS FORMULA Kft.** (registered seat: 1203 Budapest, Eötvös u. 42/a.; company reg. no.: Cg. 01 09 703514). External health and safety advisor, who, in exceptional cases receive the personal data of people entering the construction site (if it is not the contractor/the data subject itself gives his/her personal data directly). Purpose: registration of HSE training.

We may share your personal data within the companies in HB Reavis Group. We also may be obliged to provide your personal data to public authorities, in particular courts and law enforcement agencies (police and prosecutors) only to the extent necessary and within the limits of the law.

**From whom do we get the personal data?**

We get personal information from you.

**Do we use automated individual decision-making?**

No, we do not use automated individual decision-making.

**Do we transfer your personal data to third countries?**

Your personal data are processed within the territory of the Hungary and other states of the European Union. Your personal data can be processed by a country outside of European Union if this third country has been confirmed by the European Commission as a country with adequate level of data protection or if other appropriate data protection safeguards exist (for example, binding corporate privacy rules or EU standard data protection clauses).

**Other information**:

Personal data may also, in justified cases, be subject to use (processing) for the purpose of dealing with legal matters, including the performance of public authority obligations and monitoring for possible legal protection. Personal data may also be archived for a given public interest, as well as for scientific, historical or statistical research.

**What are your rights?**

Your rights as a data subject are stated below. Please note that the exact conditions to exercise these rights are set out in detail in Chapter III of GDPR, while in a particular circumstance not all rights may be exercised. You have following rights:

* Access to personal data we process about you
* Rectification of incorrect or inaccurate personal data and add incomplete personal data
* Restriction, i.e. blocking of processing of your personal data
* The deletion of personal data in case the purpose absence or unauthorized data processing
* Submission of an objection to the processing of personal data if you believe that our data processing is not justified
* Be excluded from automated decision-making
* Listing of personal data in a structured and machine-readable format or for another controller
* Revocation of consent to the processing of personal data
* To lodge a complaint with the supervisory authority

**How can you exercise your rights?**

HB Reavis Construction Hungary Kft.

Electronically: dataprivacy@hbreavis.com

In writing to the address: 1138 Budapest, Népfürdő u. 22. B. ép. 3. em.

Telephone: +421 918 723 243

We strive to protect your privacy as much as possible and therefore we process your personal data in compliance with GDPR and all other relevant laws. However, if you disagree with the way we handle your personal data, you can exercise your rights via our Data Protection Officer at:

Data Protection Officer’s contact: Erika Wild, contact point at Twin City C, Mlynské Nivy 16, 821 09 Bratislava, Slovak Republic, tel. +421 918 723 243, email: dataprivacy@hbreavis.com

Or you can file a complaint in supervising authority regarding the processing of your personal data. Your local supervisory authority may be found at: <https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm>