

Privacy Notice for the website of Dorottya Residences Zrt.

Dorottya Residences Zrt., as Controller, respects the privacy of all individuals to whom personal data are disclosed and is committed to protecting such data.

If you wish to request any action in relation to the processing of your data (transfer, erasure, correction, etc.), please feel free to contact us using any of our contact details.

I. Data of the Controller

Name: Dorottya Residences Zrt.
Registered office: H-1026 Budapest, Pasaréti út 122-124
Telephone:
Email: sales@dorottyaresidences.hu
Represented by: Zoltán Malik
Please feel free to contact us regarding data protection matters.

II. Principles of processing

II./1. Lawfulness, fairness and transparency

Your personal data must be processed lawfully and fairly, and processing must be carried out in transparent fashion so that you are aware of all relevant information. Processing must always have an appropriate legal basis, which includes consent, performance of a contract, legal obligation, vital interests, public interest, and the legitimate interests of the Controller. Transparency includes your right to know what data of yours we process, for what purpose, for how long, and whether we disclose them to third parties. You must always be informed of the fact of processing, but the way data are processed may differ depending on whether the Controller has a website or not. If we did not obtain the data from you, we inform you of the fact of processing upon first contact, but no later than within 1 month.

II./2. Necessity and proportionality

Fundamental rights may only be restricted when necessary and in proportionate fashion. Necessity means that processing may only take place if indispensable to achieve the purpose of processing. Proportionality governs the purpose of processing and the degree of restriction in order to achieve the processing purpose proportionately and with respect for fundamental rights. The Fundamental Law states that fundamental rights may only be restricted for the purpose to be achieved and with respect for the essence of fundamental rights. When processing your data, we always comply with the principle of necessity and proportionality to ensure the protection of your fundamental rights.

II./3. Purpose limitation

In the course of processing, we collect personal data only for specified, explicit and legitimate purposes, and we do not process these in a manner incompatible with the original purposes. Before every processing purpose, we determine the purpose of processing, which is never contrary to the law. We may process data for multiple purposes, but in such cases we regulate each processing purpose separately. If the purposes of processing change, you will always be informed of such changes. However, processing that is not compatible with the original purpose may be permitted for archiving in the public interest, scientific research or statistical purposes.

II./4. Data minimisation

We store personal data in a manner that is adequate and relevant in relation to the purposes of processing and limit it to what is necessary. We do not process data that is not necessary to achieve the purpose.

II./5. Accuracy

We strive to store your personal data up to date and accurately to the best of our knowledge. We make every effort to delete or correct data that are inaccurate for our purposes immediately, if possible. At the same time, we recognise reasonable limits; for example, we cannot call everyone every day just to verify their name.

However, if you become aware that your data are incorrect or have changed, and it is consistent with the purpose of processing, it is important that you inform us so that we can rectify them as soon as possible. Ensuring the accuracy of data is among our values, but of course we understand if, for reasons unknown to you, incorrect data come into our possession. If you find yourself in any such situation, please let us know so that we can correct the errors.

II./6. Storage limitation

Your personal data are stored in a form that allows for your identification only for as long as is necessary to achieve the purposes of processing the personal data. Data that are inaccurate in relation to the purposes of processing are erased or rectified without delay, and our IT system has been designed so that the timely erasure of electronically stored data takes place automatically. The exact period of data storage and the rules for data disposal are regulated in our Privacy Policy, according to which we do not store data unnecessarily. We store your personal data for a longer period only in accordance with the GDPR for archiving purposes in the public interest, scientific and historical research purposes, and statistical purposes, provided that this is carried out with due regard to the implementation of appropriate technical and organisational measures prescribed for the protection of your rights and freedoms. Please note that the duration of data storage always depends on the purpose of processing. If your personal data change or have been processed inaccurately, please notify us without delay so that we can correct such data to the necessary extent.

II./7. Integrity and confidentiality

We process your personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. We have set up data storage so that unauthorised persons, even within the company, cannot access the data. For example, an expert staff member does not use online store order data and does not participate in the process, so we have set the organisational access privileges so that they cannot see this data.

II./8. Accountability

BDPST Group is responsible for compliance with data protection rules and must also be able to demonstrate such compliance. How does this happen? Who holds a data controller accountable? The authority of course. In Hungary, this is primarily the Hungarian National Authority for Data Protection and Freedom of Information, abbreviated as NAIH.

In the event of a report (but sometimes ex officio), the NAIH examines whether processing by the given company is lawful and fully complies with all legal requirements. In such an investigation, the Controller must be able to prove and demonstrate that it carries out its processing in accordance with the law. An important part and means of this is the existence of a privacy policy, in which the processing must be regulated lawfully. Another important aspect is that if we have a good policy, i.e. one that complies with the law, we carry out our processing in accordance therewith. A good policy alone is not sufficient.

BDPST Group has developed a data processing and data security policy for its entire processing operation and carries out its processing accordingly.

III. Lawfulness of processing

When designing our processing operations, we always ensure that the processing of data is lawful in accordance with the principle of lawfulness. We carry out our processing on the basis of the following legal grounds for processing, taking into account the highlighted detailed rules.

III./1. Consent of the data subject

You have given your consent to the processing of your personal data for one or more specific purposes. It is important that consent is given voluntarily and that you always provide your consent by an active action.

III./2. Performance of a contract

Processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract.

III./3. Legal obligation

Processing is necessary for compliance with a legal obligation to which we are subject. We only process data on the legal basis of a legal obligation if there is a statutory requirement. We do not use legal obligation as a legal basis for processing if the statutory provision is conditional.

III./4. Vital interest

Processing is necessary in order to protect your vital interests or those of another natural person. An important aspect when choosing this legal basis is that processing on the grounds of vital interests is temporary and may only last as long as the vital interest exists. The rules for processing data after the vital interest ceases are regulated separately.

III./5. Public interest or exercise of official authority

In this case, processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us. We are not considered an authority and do not carry out processing in the public interest, so we do not currently process data on this legal basis.

III./6. Legitimate interest

Processing is necessary for the purposes of the legitimate interests pursued by BDPST Group or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where the data subject is a child. In our processing activities, we often process data on this legal basis.

In the case of processing based on legitimate interests, we have always carried out an interest assessment test, in which we examined the proportionality and necessity of the impact and restriction on your fundamental rights and freedoms.

IV. Data security

We would like to emphasise that Dorottya Residences Zrt. is committed to the protection of personal data and takes all necessary measures to preserve their security. To this end, we apply appropriate technical and organisational measures, such as physical access control, employee training, and the encryption and password protection of access to our systems.

It is important to highlight that data transmission over the Internet is not completely secure, thus despite doing everything we can, we cannot guarantee the complete security of the personal data you transmit via our website. Please note that transmission of data via our website is at your own risk.

We also draw your attention to the fact that if you have received a password from us or have chosen one yourself, you are responsible for keeping it confidential, and we ask that you do not share it with anyone.

V. Cookie management

V./1. What is a cookie?

A cookie is a small text file that is placed on your computer when you visit a website. Cookies have several functions, including collecting information, remembering user settings, and enabling the website owner to learn about user habits to enhance the user experience. You can manage your cookie settings at any time in your browser settings.

V./2. Why do we use cookies?

- We use cookies to improve our sites,
- To enhance the user experience,
- To facilitate the management of our sites,
- To obtain information about user habits,
- To place targeted advertisements.

V./3. What cookies do we use?

Strictly necessary cookies

Strictly necessary cookies help make our website usable by enabling basic functions such as page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Preference cookies

By using preference cookies, we can remember information that changes the behaviour or appearance of the website, such as your preferred language or the region you are in.

Statistics cookies

Through the collection and reporting of data in an anonymous form, statistics cookies help the website owner understand how visitors interact with the website.

Marketing cookies

We use marketing cookies to track visitors' website activity. The objective is to publish relevant advertisements to individual users and encourage their engagement, which makes our website more valuable for both content publishers and third-party advertisers.

The purpose of using these cookies is to display relevant advertisements and content by creating user groups. The process related to this involves manual intervention.

These cookies are stored on your device by the system. These cookies are not suitable for identifying individuals.

We use remarketing services, such as the Google AdWords remarketing service, to deliver personalised advertisements to you. You can disable these cookies in the [Google Ads settings manager](#) by following the instructions provided there. You can find information about Google's advertising privacy policy [by clicking here](#).

V./4. Cookie settings

By default, all browsers allow the use of cookies. If you wish to delete cookies from our sites or do not want to use them, please refer to the links below depending on which browser you use:

- [Google Chrome](#)
- [Edge](#)
- [Firefox](#)
- [Microsoft Internet Explorer 11](#)
- [Microsoft Internet Explorer 10](#)
- [Microsoft Internet Explorer 9](#)
- [Microsoft Internet Explorer 8](#)
- [Safari](#)

Please note that if you disable cookies, certain elements or the full functionality of the website may not be available.

V./5. Information on processing related to cookies

Purpose of data processing

Strictly necessary cookies: ensuring the proper functioning of the website.

For other cookies:

development of our website, facilitating your navigation on our website and the use of its functions, thus ensuring a seamless user experience, collecting information about the use of our website, placing targeted advertisements on other websites (remarketing), tracking activities performed on the website to deliver specifically relevant offers to you, and sending personalised offers to the contact details provided during registration.

Legal basis for processing

For strictly necessary cookies:

The legal basis for processing is “the necessity of processing for the purposes of the legitimate interests pursued by the Controller or by a third party” as set out in Article 6(1)(f) of the GDPR.

For other cookies:

The data subject’s consent – “the data subject has given consent to the processing of their personal data for one or more specific purposes” as set out in Article 6(1)(a) of the GDPR;

Presentation of legitimate interest

Without cookies, the website cannot function fully in all its features, and thus the website cannot fulfil its purpose. On the other hand, the website needs to be protected against potential attacks. Therefore, the Controller has a compelling legitimate interest in recording the online identifier (IP address) of users visiting the website, which qualifies as personal data, as well as other personal data generated in connection with browsing (time of browsing, type of browser, certain characteristics of the device’s operating system used for browsing; such as type of operating system and set language), and thus to prevent external attacks targeting the website and public electronic services. For all these reasons, the Controller operating the website has a legitimate interest in the use of strictly necessary cookies.

Categories of data subjects

Natural persons visiting the website

Categories of personal data

The online identifier (IP address) of users visiting the website, which qualifies as personal data, as well as other personal data generated in connection with browsing (time of browsing, type of browser, certain characteristics of the operating system of the device used for browsing; such as type of operating system and set language)

Name of the cookie, provider, purpose of the cookie, type, and the duration of processing for this purpose:

You can obtain more detailed and up-to-date information about this by clicking on the cookie information at the bottom of the website.

Is it mandatory to provide personal data, and consequences of failure to provide data

For strictly necessary cookies: Yes

Without this, you cannot access the site and it cannot be used properly.

Enabling other cookies is not mandatory

Information on the existence of automated decision-making

Automated decision-making procedures are expected to be carried out by the Controller during data processing for this purpose.

VI. The various data processing operations

	Purpose of data processing	Legal basis (Article 6 of the GDPR)	Scope of data concerned	Data processor(s)	Data retention period
1	Contact, handling enquiries (e.g. via web form)	(1)(b) steps prior to entering into a contract	name, email address, telephone number, subject of enquiry, content of message	BDPST Koncept Kft. – operation of website and form	max. 1 year from the closure of the enquiry
2	Intermediation and sale of real estate	(1)(b) performance of a contract	name, contact details, real estate data (topographic lot number, address, characteristics), financial data	—	5 years from termination of the contract (Accounting Act)
3	Fulfilment of statutory obligations, including in particular: – customer due diligence related to the prevention of money laundering and terrorist financing (Act LIII of 2017 – AML Act), – fulfilment of tax and accounting obligations (Act C of 2000 – Accounting Act, Act CXXVII of 2007 – VAT Act, Act CL of 2017 – Act on Taxation), – as well as the requirements for retaining supporting documents.	(1)(c) legal obligation	identification data, address, tax identification code, bank account number, account details	Corient Accounting Kft. – bookkeeping, invoicing	AML Act: 8 years, Accounting Act: 8 years
4	Marketing and sending newsletters	(1)(a) consent	name, email address, telephone number, area of interest	MailChimp	until consent is withdrawn or, in case of inactivity, 2 years
5	Measurement of customer satisfaction, follow-up	(1)(f) legitimate interest	name, email address, feedback	—	1 year from data collection

6	Invoicing, bookkeeping	(1)(c) legal obligation	name, address, tax number, bank account number, account details	Corient Accounting Kft. – bookkeeping, invoicing	8 years (Accounting Act, Section 169)
7	Complaints handling, enforcement of legal claims	(1)(c) and (1)(f)	name, contact details, content of complaint, related documents	—	5 years from closure of the case
8	Website and cookie management (cookies)	strictly necessary cookies: (1)(f); analytical and marketing cookies: (1)(a)	IP address, cookie identifier, browsing data	BDPST Koncept Kft. – operation of website and cookie system	strictly necessary cookies: until the end of the session; analytical/marketing cookies: 6 months – 2 years
9	IT security, access logging	(1)(f) legitimate interest	log files, user identifiers, IP address, timestamp	SMB Info Kft. – IT maintenance, system security	6 months – 1 year

VII. Data processor(s)

For certain activities, the Controller engages processors pursuant to Article 4(8) and Article 28 of the GDPR. Processors act on behalf of and under the instructions of the Controller, and ensure the protection of personal data in accordance with the obligations set out in Articles 28 and 29 of the GDPR. The legal relationship governing processing activities is in all cases regulated by a written contract, which ensures that processors may process personal data solely for the purpose and in the manner determined by the Controller.

VIII. Your rights

If you wish to exercise your above rights (request the transfer, erasure, rectification, etc. of your data), please contact us via any of our contact details or by completing the form at the end of this section. You are entitled to the following rights:

VIII./1. Right to information

We are obliged to provide information of appropriate size, in the appropriate language, in plain language and easily accessible, on the essential aspects of processing (what, for what purpose, how, from when to when it is used, etc.) – and the GDPR precisely defines the scope of the required information. Where possible, information must be provided before the collection of personal data. If this is not possible – for example, because the data are obtained from a third party – it will be provided at the earliest possible opportunity. You can read about the right to information in Articles 13-14 of the GDPR.

VIII./2. Right of access

You may request information as to whether processing concerning you is taking place, and if so, which of your data we process and under what conditions. The conditions that can be queried are detailed above under the right to information. You can read about the right of access in Article 15 of the GDPR.

VIII./3. Right to rectification

You may notify us if the data processed are inaccurate and request what we should indicate instead. If you become aware that your data are inaccurate or incorrect, please notify us as soon as possible and we will correct them. You can read about the right to rectification in Articles 16 and 19 of the GDPR.

VIII./4. Right to erasure

In cases and under the conditions specified by law, you may request that your data be erased from the database. Such a case is, for example, when the personal data are no longer necessary for the purpose for which they were collected or otherwise processed, or if you withdraw your consent and there is no other legal basis for the processing.

Unfortunately, however, there are cases where we must refuse to erase the data. One such case is if the law requires us to retain the data (for example, data used for invoicing must, as a general rule, be stored for 8 years in accordance with the relevant legislation), but we may also refuse erasure within the limitation period on the grounds of legitimate interest – for example, for possible future proof. And of course, beyond these examples, there are many cases where processing is lawful despite an objection. As is generally the case in data protection, every case is unique and must be individually assessed as to whether the refusal to erase the data is lawful.

You can read about the right to erasure in Articles 17 and 19 of the GDPR.

VIII./5. Right to restriction of processing

In cases and under the conditions specified by law, you may request that the processing of your data be restricted (even for a period specified by law). Except for the exceptions specified by law, data subject to restriction may only be stored and no other operation may be performed on them. If the restriction is lifted, we will inform you accordingly.

You may request restriction in the following cases:

- You contest the accuracy of the personal data, in which case the restriction applies for the period necessary to verify the accuracy of the personal data.
- If the processing is unlawful but you oppose the erasure of the data, you may request the restriction of their use instead.
- The Controller no longer needs the personal data for the purposes of processing, but you require them for the establishment, exercise or defence of legal claims.
- You have objected to the processing; in this case, the processing will be restricted for the period until it is determined whether the Controller's legitimate grounds override your own.

You can read about the right to restriction in Articles 18 and 19 of the GDPR.

VIII./6. Right to data portability

You may request to receive the data concerning you, which are processed, in a structured, commonly used and machine-readable format (e.g. .doc, .pdf, etc.), and you are also entitled to transmit those data to another Controller without hindrance from the original Controller. That is, the GDPR framework facilitates the position of the data subject to transfer their personal data from one Controller to another. However, this is only possible if the processing is carried out by automated means.

You can read about the right to data portability in Article 20 of the GDPR.

VIII./7. Right to object

You are entitled, in certain cases, to object to the processing of your data. In the event of an objection, we may not process the personal data unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms, or which are necessary for the establishment, exercise or defence of legal claims, or for proceedings before an authority or court.

In certain cases, you have the right to request not to be subject to automated decision-making if you wish this not to apply to you. The primary condition for this is that it is not necessary for the conclusion or performance of the contract between you and us, and that the law does not require automated decision-making in the given matter.

You can read about the right to object and automated decision-making in Articles 21-22 of the GDPR.

IX. Where to seek legal remedy

First of all, please feel free to contact us; we will do our utmost to resolve your issue. If this does not succeed, or you do not wish to do so, you may contact the data protection authority or open proceedings before a court.

Contact details of the data protection supervisory authority in Hungary:

Hungarian National Authority for Data Protection and Freedom of Information

Postal address: H-1363 Budapest, Pf.: 9

Address: H-1055 Budapest, Falk Miksa utca 9-11

Telephone: +36 (1) 683-5969

Email: ugyfelszolgalat@naih.hu

Website: <https://naih.hu>

Right to turn to the courts:

If your data subject rights are infringed, you may also bring proceedings against the Controller before a court. You may bring such proceedings before the court competent according to your habitual residence or place of stay.

X. Validity of this Policy

This Policy is valid from 1 October 2025 until revoked