

Privacy Policy

Han Spaces (hereinafter referred to as “*Han Spaces*” or the “*Company*”) manages and is the owner of the www.hanspaces.hu website through which the company presents our portfolio of projects in energy, medical, automotive, aviation, food industries, production plants, commercial and residential buildings and more. Han Spaces manifests a special interest in the field of personal data processing, having a constant concern for improving internal processes and updating the IT means, ensuring a superior quality of the processing activities carried out, in accordance with the legal norms in force.

The intellectual property rights of the www.hanspaces.hu platform, (including, but not limited to design, drawings, graphic representations, and text that are available on the website) belong exclusively to Han Spaces.

This Privacy Policy informs you about the processing of personal data in connection with your relationship as a representative of the partner Han Spaces or a legal person interested in the company's services, in our capacity of contractor (builder) and, respectively, of Personal Data Controller. Please also note that we may process your personal data in other contexts, for example when [you visit our website](#) or if you are our [business partner](#) for various products or services.

- **For what purposes do we process your personal data?**

We collect and use your data for the following purposes:

- Obtaining the necessary information regarding the specifications of the enterprise project and the conditions expected by our clients, in order to personalize, if necessary, the services offer;
- Maintaining a database of customers interested in our services and contacting them in order to present the company's offers and projects;
- Maintaining a constant communication with you in order to carry out the services that are the object of the platform (presentation of our Company's projects), or if you send a request for a personalized offer;
- Contacting you in order to constantly inform about the best practices in the construction field and to keep you up to date with our Company's news, with the projects carried out and / or with the stage of their realization, the innovations created in the construction field in our portfolio;
- Managing the communication and IT systems as well as for carrying out security audits on our IT networks in the event of security incidents or violations of the General Data Protection Regulation, issuing reports to the competent institutions or repairing system errors;
- Fulfillment of legal obligations regarding archiving, security, reporting, keeping records and other legal obligations;

- Improving the services, identifying potential problems with our services, solving any complaints registered through the contact forms integrated in the website, managing the usual correspondence with the contractual partners, etc.;
- Meeting our compliance requirements, such as those arising from anti-corruption laws, anti-money laundering laws and other economic crime laws, regulatory laws in the field of personal data protection, as well as disclosure requirements for data and information on the commercial activity carried out, resulting from applicable laws and, where applicable, self-regulatory codes of conduct due to our membership, now or in the future, in various trade associations.

- **What kind of data do we process and how do we do that?**

We may collect and use your personal data in the following situations:

The information you provide to us, which we thus collect according to the different types of interactions you have with us.

Such personal data include:

- Name and surname;
- Contact information such as your phone number and work e-mail address or the personal email address from which you contact us;
- Country of residence;
- Information included in the CV submitted to the company through the form on the website in the section "[Join the team](#)" in order to participate in the internal recruitment process for an open position as well as the information necessary to conclude an Individual Employment Contract with our employees in accordance with the legal provisions and our internal procedures;
- Information required by law in the framework of signing a contract of services according to the applicable laws; ;
- Information processed through the cookies we use on the platform, as specified in the [Cookie Policy](#). The information collected by these automated methods may include, for example, the user's IP address, the type of browser used, the content and pages accessed on the website, the duration and frequency of visits to track users' movements on the website.
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All personal data and the information processed we usually obtain directly from you, by contacting you or by filling them in the predefined fields within the platform ("Contact" or "Join the team"), or we may use publicly available resources to contact you or to establish a business or professional relationship with you.

If we receive your contact details through a recommendation, on the date of the first contact we initiate, we will confirm with you the interest shown in Han Spaces

services and we will briefly present how we process your personal data, asking you also for your consent to the processing of these data for the purpose(s) declared under this Policy.

3. Legal basis for the processing of personal data belonging to you

We process your personal data on one or more of the following legal bases:

- We have obtained your prior consent for the processing of your personal data (Art. 6.1 lit. a, GDPR), in cases where the processing implies the need for this legal basis (consent), such as the use of cookies or the continuous information processing received through a recommendation. You can withdraw your consent at any time. You can withdraw your consent for all processing or for individual purposes of your choice. Withdrawal of consent will not affect the lawfulness of processing based on your consent prior to withdrawal. You can withdraw your consent by sending an email to hello@hanspaces.hu address.
- The processing of your personal data is necessary for the performance of a construction contract of services, or the completion of the formalities and steps necessary for the conclusion of the contract between us (art. 6.1b GDPR) and any other contract-based processing like enclosing a contract with a bank / lending institution or other organizations we may partner up and collaborate in specific cases in order to render our services.
- Processing is necessary for the fulfillment of a legal obligation, for employment or for the reporting of cases (security incidents, financial-fiscal situations, audits, legal proceedings).
- The processing is necessary for the purpose of legitimate interests pursued by us or by a third party we may collaborate with in punctual cases, partners with the help of which we make promotional materials regarding the services, projects we organize or carry out), unless these interests violate or contradict your fundamental rights and freedoms that require increased protection of personal data (Article 6.1 f, GDPR). Thus, the legitimate interest of Han Spaces is to maintain a database in order to send commercial offers and communications to promote our services to our potential business partners.

4. Where do we transfer your data?

As a rule, Han Spaces does not disclose the personal data collected to other companies, organizations or individuals in any country except for group entities and other organizations with which we may collaborate at times to achieve our contractual or bid purposes. Therefore, we may send your personal data in part or in full to some of our contractual partners, such as subcontractors, personal recruitment companies or companies promoting our services. At any time, you can ask us for an updated list of the contractual partners who process your personal data as a result of the relationship concluded with Han Spaces, at the e-mail address hello@hanspaces.hu and the person responsible for taking over the requests regarding the data processing will return as soon as possible, but at the latest within 30 days from the date of receipt of the submitted request.

As a result, we ensure that our partners comply with the rules of the General Data Protection Regulation and have implemented appropriate technical and organizational measures for the protection of personal data belonging to you.

Also, if required by law, we transmit your data to certain state authorities that may request such data and information. Thus, we may transmit data and information about you to:

- Competent authorities regulating specific areas (such as the construction or medical field), prosecutors and other recipients responsible for the implementation of transparency rules, as well as commercial, civil, criminal and/or administrative laws;
- authorities, courts, parties to a dispute, to the extent necessary to comply with any applicable law, regulation, legal process or governmental request;
- Professional advisers or auditors such as tax advisors, financial auditors, lawyers, insurers, banks and other external professional advisers from the countries where we operate.
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The promotion of our services / projects is carried out through punctual or recurring promotion campaigns through our company LinkedIn page. Han Spaces does not process personal data belonging to you at the level of this network. Thus, if you contact us through the messaging function (chat) available on the LinkedIn page, the LinkedIn Privacy Policy will apply, thus we recommend you access it (available below), in order to obtain more information on how your personal data is processed by this company.

[LinkedIn Privacy Policy](#)

5. How long do we process your data (storage period)?

Personal data relating to your interactions with us will be deleted according to the retention periods set out below. The periods of storage of personal data are specified in the table below and apply to all record formats, i.e. paper and/or electronic format, unless otherwise specified in this Policy.

DEPARTMENT	PRE-ICING ACTIVITY	RETENTION PERIOD
Commercial communications sent by e-mail	Transmission to users / customers who have filled in the contact form data integrated on the website or who are interested in the company's offers and have provided us with the e-mail address in this regard.	6 months from the date of transmission of each subsequent session of commercial communications they are completely deleted from the company's records.
Commercial	Phone calls for direct communications with you	We currently do not store phone calls
HR & Legal support	E-mail received from a client for filing a complaint	3 years from the date of its receipt in physical and electronic format
HR and Legal support	E-mail received from a client for submitting a request in connection with the company's commercial activity	3 years from the date of its receipt in both physical and electronic format. If those e-mails do not have an important legal or economic impact in the company's work, then they can be deleted at shorter intervals depending on the specific decision set in the internal hierarchy of the organization.
Human Resources	The information in the CV sent for recruitment for a vacancy within Han Spaces and other information regarding recruitment and / or that is necessary in this process.	9 months from the date of sending the CV with the possibility of extending this term as a result of a punctual agreement concluded with you in this regard.

<p>The data of the clients who have not yet signed a contract with Han Spaces but with whom we have a continuous communication in terms of the interest shown in our projects.</p>	<p>Until the date of expressing a limiting right for the processing of data by the company.</p>	<p>In general, until the date of the request to delete the data or until the date we found out that the data has become inactive. We update this database whenever we have or are made aware of changes to this data and in any case, every year we operate the update of the database and remove by deleting the information that is no longer current.</p>
<p>Inactive users or customers in our database, with whom we do not communicate regularly, respectively interested users who have filled in the contact form within the website or have contacted us through our LinkedIn page or whose data we process following a recommendation.</p>	<p>6 months from the date of the last communication then we delete the personal data of the respective user / client</p>	<p>10 years from the date of termination of the contract</p>
<p>Revoked consent</p>	<p>Within maximum 30 days from the revocation of the granted consent, we delete the processed personal data, unless the law provides otherwise in the course of carrying out the activity.</p>	<p>10 years from the date of termination of the contract</p>
<p>Written communications (e-mail)</p>	<p>1 year from the date of sending the e-mail, unless the existing legal relationship (the existence of a signed lease or sale-purchase contract) obliges us to store certain information for a longer period, depending on the legal provisions in force.</p>	<p>1 year from the date of the last contact</p>
<p>Cookies</p>	<p>The terms of processing of personal data are set out punctually in the Cookie Policy.</p>	<p>Until the date of the request to delete the data or until the date we found out that the data had become inactive.</p>

For information on the storage terms of some personal data processing activities within the company, which are not specified in this Policy, please send your requests to the e-mail address hello@hanspaces.hu or by accessing the other means of communication made available under this Policy.

6. Data deletion requests

You can request the deletion of personal data by sending an email to hello@hanspaces.hu address where you must specify the following:

- Your contact details for the transmission of the answer / point of view of the company;
- Your name;
- Processing activities through which the data were collected or processed (recruitment, contract concluded etc.);
- The type of data collected or processed you want to delete;
- The total number of entries to be deleted;

The deadline for replying to the submitted request shall not be more than 30 days from the date of transmission of the request. To the extent that the complexity of your request implies the need to extend the deadline for replying, the extension will not exceed a period of 30 working days. In this regard, a representative of the company will communicate you the status of the submitted request.

To the extent that the submitted request will be resolved after its evaluation within Han Spaces with the deletion of the mentioned data, we will send you a document that represents the company's point of view on your request and the actions taken, through the agreed means of communication. The document shall contain at least the following information:

- The purpose(s) based on which the data was processed;

- Data that has been deleted / eliminated / destroyed and the processing activity within Han Spaces to which they belonged;

- Number of entries removed.

The physical document transmitted will be signed by a representative of Han Spaces and is stored and scanned in physical format, for a period of 3 years from the date of transmission of the notification, and after this period the original document will be destroyed and recycled. If the point of view will be transmitted by email, it will be stored on the company's servers for a period of 3 years from the date of its transmission to the applicant on the email address provided, then it will be deleted.

If you send a request to Han Spaces for access to the processing activities of your personal data in our company, please note that due to the continuous processing of your personal data and considering the routine established in our systems for deleting the information processed under the terms of this chapter, we try to always keep your data up to date and accurate. Thus, this routine processing may involve modifying or deleting the personal information we process after you have submitted a request to us. In this case, Han Spaces will provide the information held at the time we send you the answer, even if it differs from the information, we had stored at the time of sending the request. Please note that the deletion of your personal data is a procedure that Han Spaces would have performed even if you had not submitted the request.

7. Questions and complaints

Depending on the situation, you have certain rights regarding your personal data. You have the right to:

- Request access to your personal data
- Request rectification of your personal data
- Request the deletion of your personal data
- Request restriction of processing of your personal data
- Request data portability, to the extent that the conditions for the portability of personal data are met
- The right not to be subjected to an automatic decision-making process or to profiling activities. At the present date, Han Spaces does not process personal data through activities that involve making decisions automatically, nor through profiling.
- Object on grounds specific to your situation
- The right to address the National Supervisory Authority for Personal Data Processing;

- You can exercise these rights online using the email address of the person responsible for processing requests for the processing of personal data: hello@hanspaces.hu.

Information of the Authority on the Processing of Personal Data in Hungary

<https://naih.hu/about-the-authority>

Szilágyi Erzsébet fasor 22/C H-1125 Budapest HUNGARY

| privacy@naih.hu

8. Additional information for specific situations

Your personal data is requested for the purpose of achieving the respective interaction with you, as established by the [contact form](#) on the website, by sending a direct mail or telephone. If you do not provide us with your personal data, we cannot send you personalized offers, information about our future projects, about their state of construction or we cannot establish a continuous communication with you.

9. Amendments to this data protection declaration

As the collection and use of your data may change over time, please keep your profile data up to date, or ask us to update it whenever changes occur, to always reflect our data processing practices correctly.

We recommend that you review from time to time this Privacy Policy that we may change at any time, to the extent that legislative changes have occurred or if there have been changes in our business activity.

10. Controller of personal data and Contact information

The controller and the entity responsible for the processing of personal data considering the entity responsible for the data processing is: HAN SPACES (Synergy Office Spaces Kft.)