

Countries covered in comparative analysis

Austria	maximum amount hypothec	<i>Höchstbetragshypothek</i>
Belgium	maximum amount hypothec	<i>hypothèque pour toutes sommes; hypotheek voor alle sommen</i>
Bosnia – H.	securing land charge	<i>osiguravajući zemljišni dug</i>
Bulgaria	hypothec	<i>употека (ипотека)</i>
Croatia	maximum amount hypothec	<i>hipoteka do najvišeg iznosa kreditna hipoteka kauciona hipoteka</i>
Czech Republic	lien on real estate	<i>zástavní právo k nemovitostem</i>
Denmark	security right on immovable property for the owner	<i>ejerpantebrev</i>
England / Wales	security right on immovable property	<i>charge by way of legal mortgage</i>
Estonia	hypothec	<i>hüpoteeik</i>
Finland	security right on immovable property	<i>panttikirja / pantbrev</i>
France	hypothec	<i>hypothèque</i>
Germany	securing land charge	<i>Sicherungsgrundschuld</i>
Greece	hypothec	<i>υποθήκη (ipothiki)</i>
Hungary	independent hypothec	<i>önálló zálogjog</i>
Ireland	security right on immovable property	<i>charge by way of legal mortgage</i>
Italy	hypothec	<i>ipoteca</i>
Japan	maximum amount hypothec	<i>neteito ken</i>
Latvia	hypothec	<i>hipotēka</i>
Lithuania	maximum amount hypothec	<i>maksimalioji hipoteka</i>

Countries covered in comparative analysis

Luxembourg	maximum amount hypothec	<i>hypothèque</i>
Netherlands	bank hypothec	<i>Bankhypotheek</i>
New York (USA)	mortgage	<i>mortgage (lien on real property)</i>
Norway	abstract mortgage certificate	<i>gjort pantobligasjon ¹⁾</i>
Ontario (Canada)	security right on immovable property	<i>charge / mortgage on land</i>
Poland	hypothec	<i>hipoteka</i>
Portugal	hypothec	<i>hipoteca</i>
Romania	hypothec	<i>ipoteka imobiliară</i>
Scotland	security right on immovable property	<i>standard security</i>
Serbia	out of court enforceable maximum amount hypothec	<i>vansudska izvršna hipoteka na najviši iznos</i>
Slovakia	lien on real estate	<i>záložné právo k nehnuteľnostiam</i>
Slovenia	maximum amount hypothec	<i>maksimalna hipoteka</i>
Spain	maximum amount hypothec	<i>hipoteca de máximo</i>
Sweden	security right on immovable property	<i>Panträtt (i fast egendom)</i>
Switzerland	debt certificate conveyed as security	<i>Sicherungsübereigneter Inhaberschuldbrief</i>
Turkey	maximum amount hypothec	<i>üst sınır ipotegi</i>
Ukraine	hypothec	<i>inomeka (ipoteka)</i>

1) Since 1999 forbidden to use if the owner is a consumer according to the Financial Contracts Act