



**CONTINENTAL**  
HOTEL BUDAPEST \*\*\*\**Superior*

# DATA PROTECTION POLICY

Effective as of May 25, 2018

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## I. Introduction

This document (hereinafter referred to as '*Policy*') is intended to provide adequate information regarding the activities carried out within the framework of the management of personal data of natural persons by Joy Hotels Limited Liability Company (hereinafter referred to as "*Controller*"), as operator of Continental Hotel Budapest (address: H-1074 Budapest, Dohány utca 42-44., Hungary; hereinafter referred to as '*Hotel*'). The content of the Policy is based in particular on the relevant provisions of the following national and European Union legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council 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 (General Data Protection Regulation, hereinafter referred to as 'GDPR');
- Act CXII of 2011 on Informational Self-Determination and the Freedom of Information (hereinafter referred to as 'Infotv.');
- Act CVIII of 2001 on Certain Aspects of Electronic Commerce and Information Society Services (hereinafter referred to as 'Ekertv.');
- Act C of 2003 on Electronic Communication (hereinafter referred to as 'Eht.');
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (hereinafter referred to as 'Grt.');
- Act C of 2000 on Accounting (hereinafter referred to as 'Sztv.');
- Act CL of 2017 on the Rules of Taxation (hereinafter referred to as 'Art.');
- Act C of 1990 on Local Taxes (hereinafter referred to as 'Htv.');
- Municipality Decree of Belváros-Lipótváros 38/2010. (XII.2.) on the Local Introduction of a Tourist Tax (hereinafter referred to as 'Önkr.');
- Act CXXXIII of 2005 of the Rules on Personal and Property Protection Activities and Private Investigation (hereinafter referred to as 'Szvmtv.');
- Act CXIX of 1995 on the Use of Name and Address Information Serving the Purposes of Research and Direct Marketing (hereinafter referred to as 'Nlktv.');
- Act V of 2013 on the Civil Code (hereinafter referred to as 'Ptk.');
- Act XIX of 1998 on Criminal Proceedings (hereinafter referred to as 'Be.');
- Act II of 2012 on Infringements, Infringement Proceedings and Infringement Registration System (hereinafter referred to as 'Szabstv.');
- Act CLV of 2016 on Official Statistics (hereinafter referred to as 'Stattv.');

- Governmental Decree 388/2017 (XII.13.) on the Mandatory Reporting of the National Statistical Data Collection Program (hereinafter referred to as ‘OSTAPr.’);
- Act II of 2007 on the Entry and Residence of Third-Country Nationals (hereinafter referred to as ‘Hmtv.’);
- Governmental Decree 114/2007 (V.24.) on the Entry and Residence of Third-Country Nationals (hereinafter ‘Hmtv vhr.’):
- Act CLV. of 1997 on Consumer Protection (hereinafter referred to as ‘Fgytv.’)

The text of the Policy is available in English language continuously and can be retrieved from the website <https://continentalhotelbudapest.com/privacy-security> and in hard copy at the Controller's seat and at the location of effective data processing at H-1074 Budapest, Dohány utca 42-44., Hungary.

**PLEASE READ THIS POLICY CAREFULLY!**

## II. Controller

Name: Joy Hotels Limited Liability Company

Abbreviated name: Joy Hotels Ltd.

Seat / Head of premises: H-1195 Budapest, Üllői út 283, Hungary.

Company registration number: 01-09-177739 (Company Registry Court of Budapest – Capital Regional Court)

Tax number: 24695198-2-43

Phone number: +36 1 815 1000

Fax: +36 1 815 1001

E-mail: [continentalbudapest@zeinahotels.com](mailto:continentalbudapest@zeinahotels.com)

Location of effective data processing: H-1074 Budapest, Dohány utca 42-44., Hungary.

Contact data of effective data processing:

Phone number: +36 1 815 1000

Fax: +36 1 815 1001

E-mail: [continentalbudapest@zeinahotels.com](mailto:continentalbudapest@zeinahotels.com)

Homepage: <https://continentalhotelbudapest.com/>

**Data Protection Officer:** Pursuant to Article 37 of the GDPR, the Controller is not required to appoint a data protection officer

### III. Terms and definitions

**‘Personal data’** means any information relating to an identified or identifiable natural person (hereinafter referred to as ‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

**‘Processing’** means any operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

**‘Restriction of processing’** means the marking of stored personal data with the aim of limiting their processing in the future;

**‘Profiling’** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal characteristics relating to a natural person, in particular to analyse or predict characteristics concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

**‘Controller’** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

**‘Processor’** means a natural or legal person, a public authority, agency or any other body that processes personal data on behalf of the controller;

**‘Recipient’** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

**‘Third party’** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

**‘Consent of the data subject’** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

**‘Personal data breach’** means a breach of security resulting in accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data transmitted, stored or otherwise processed;

**‘Data concerning health’** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

**‘Main establishment’** means:

a) as regards a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter establishment has the power to have such decisions implemented, in which case the establishment having taken such decisions is to be considered to be the main establishment;

b) as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under this Regulation;

**‘Representative’** means a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27, represents the controller or processor with regard to their respective obligations under this Regulation;

**‘Supervisory authority’** means an independent public authority established by a Member State in accordance with Article 51 of the GDPR;

**‘Supervisory authority concerned’** means a supervisory authority which is concerned by the processing of personal data because:

(a) the controller or the processor is established on the territory of the Member State of that supervisory authority;

(b) data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or

(c) a complaint has been lodged with that supervisory authority;

**‘Cross-border processing of personal data’** means either:

(a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or

- (b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.

**'Relevant and reasoned objection'** means an objection to a draft decision as to whether there is an infringement of this Regulation, or whether envisaged action in relation to the controller or processor complies with this Regulation, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union;

**'International organization'** means an organisation and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

**'Third country'** means any state that is not an EEA State.

## IV. Processing

### 1. Processing of Hotel Reservations

#### 1.1. Request for Quotation

Guests have the option of requesting a quotation from the Controller by electronic means and to decide on an event or service upon having received the quotation. With regard to booking a room, such option is not provided.

Processed data	Purpose of processing	Lawfulness of processing
<b>Name (Last name / First name)</b>	Contacting the guest, Further contact, Identifying guests, Distinguishing guests from each other, Providing targeted service, Providing information on the prices and conditions of the services provided by the Controller	<b>Consent</b>
<b>Company name</b>		
<b>E-mail address</b>	Contacting the guest, Further contact, Providing targeted service, Providing information on the prices and conditions of the services provided by the Controller	
<b>Phone number</b>		
<b>Planned number of attendees</b>	Providing targeted service, Providing information on the prices and conditions of the services provided by the Controller	
<b>Time of arrival and</b>		
<b>Accommodation request (number of rooms)</b>		
<b>Type of the event</b>		
<b>Number of rooms</b>		



<p><b>Information about the reservation (Date and time, Date of arrival, Date of departure, Number of adults, Number of children, Age of children, Board type, Room type, Payment method, Debit / Credit card details (Card number, Cardholder's name, Validity period, Cvv code), License plate number</b></p>	<p>Processing the room reservation request, Connecting the room and the guest concerned, Reserving the room concerned, Providing targeted service, Issuing an invoice, Complying with accounting obligations, Establishing a contract, Defining and modifying its content, Monitoring its fulfilment, Billing derived charges and enforcing claims related to it</p>	<p><b>Consent</b></p> <p><b>Compliance with legal obligations</b></p> <p><b>Performance of the contract</b></p>
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**Processed personal data:**

- (a) the processed personal data is directly provided to the Controller by the guest, or
- (b) the processed personal data will be collected and queried by the Controller via sources listed as per Annex 1 to this Policy (by name and registered seat) (see **Annex 1**):

**Lawfulness of processing**

(a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

(b) Fulfilment of a contract - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (Article 6 (1) (b) of the GDPR);

- **Pursuant to Article 13/A (1) to (2) of the Ekertv.:** *The service provider may process the data of personal identity and address necessary to identify the person requesting the service for the purpose of establishing a contract on the provision of a service related to the information society, defining and modifying its content, monitoring its performance, billing the charges derived therefrom and enforcing claims related thereto. The service provider may process the natural data of personal identity related to the provision of a service related to the information society, address and data related to the date, time and place of use connected to the billing of charges derived from the contract on the provision of a service related to the information society.*

(c) Compliance with a legal obligation - processing is necessary for compliance with a legal obligation to which the Controller is subject; (Article 6 (1) (c) of the GDPR);

- **Pursuant to Article 166 (3) of the Sztv.:** *The accounting certificate must be issued at the date and at the time of the occurrence of the economic transaction or event, or the taking or execution of the economic measure, in Hungarian language.*
- **Pursuant to Article 169 (2) of the Sztv.:** *Accounting certificates directly and indirectly supporting the bookkeeping (including G / L accounts, analytical and / or detailed records), shall be preserved in a readable form for at least eight years, retrievable in a manner consistent with the accounting records.*

**Duration of the processing:**

- (a) In case of cancellation without legal consequences, the data will be deleted immediately;
- (a) In case of failure to conclude a contract or termination of a contract for a period of five (5) years after the failure to conclude a contract or termination of the contract;

- (b) In the case of issuance of accounting records, for 8 (eight) years from the date of issue;
- (c) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** no booking / contract is made for the given room.

**Data transmission:**

<b>Name of the recipient</b>	<b>Registered seat</b>	<b>Role</b>	<b>Data processing task</b>	<b>Legal basis</b>
<b>Maistro Informatics Ltd.</b>	1182 Budapest, Rudawszky u. 10.	<b>Processor</b>	Owner and developer of the hotel and restaurant management software	<b>Processing is required for the performance of the contract</b>
<b>Navarino Services Limited</b>	Navarino House, Network Point, Range Road, Witney, Oxfordshire, OX29 0YN, United Kingdom	<b>Processor</b>	Owner of the Navarino software, integrated into the booking system; the manager of the Navarino Internet Booking Engine (IBE)	<b>Processing is required for the performance of the contract</b>

### 1.3. Hotel Reservations by Phone

The Processor also sells the rooms of the Hotel via telephone, after which it requires a written confirmation / order from the guests.

<b>Processed data categories</b>	<b>Purpose of processing</b>	<b>Lawfulness of processing</b>
<b>Name (Last name / First name)</b>	Contacting the guest, Further contact, Identifying guests, Distinguishing guests from each other, Processing the room reservation request, Connecting the room and the guest concerned, Reserving the room concerned, Providing targeted service, Issuing an invoice, Complying with accounting obligations  Establishing a contract, Defining and modifying its content, Monitoring its fulfilment, Billing derived charges and enforcing claims related to it	<b>Consent</b>  <b>Compliance with legal obligations</b>  <b>Performance of the contract</b>
<b>Address (domicile or place of residence) [country, postal code, city, street, street number]</b>		
<b>Phone Number</b>	Contacting the guest, Further contact, Providing targeted service	<b>Consent</b>
<b>E-mail address</b>		<b>Consent</b> <b>Performance of the contract</b>
<b>Information about the reservation (Date and time, Date of arrival,</b>	Processing the room reservation request,	

<b>Date of departure, Number of adults, Number of children, Age of children, Board type, Room type, Payment method, Debit / Credit card details (Card number, Cardholder's name, Validity period, Cvv code), License plate number</b>	Connecting the room and the guest concerned, Reserving the room concerned, Providing targeted service, Issuing an invoice, Complying with accounting obligations, Establishing a contract, Defining and modifying its content, Monitoring its fulfilment, Billing derived charges and enforcing claims related to it	<b>Consent</b>  <b>Compliance with legal obligations</b>  <b>Performance of the contract</b>
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**Lawfulness of processing:**

(a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

(b) Fulfilment of a contract - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (Article 6 (1) (b) of the GDPR);

- **Pursuant to Article 13/A (1) to (2) of the Ekertv.:** *The service provider may process the data of personal identity and address necessary to identify the person requesting the service for the purpose of establishing a contract on the provision of a service related to the information society, defining and modifying its content, monitoring its performance, billing the charges derived therefrom and enforcing claims related thereto. The service provider may process the natural data of personal identity related to the provision of a service related to the information society, address and data related to the date, time and place of use connected to the billing of charges derived from the contract on the provision of a service related to the information society.*

(c) Compliance with a legal obligation - processing is necessary for compliance with a legal obligation to which the Controller is subject; (Article 6 (1) (c) of the GDPR);

- **Pursuant to Article 166 (3) of the Sztv.:** *The accounting certificate must be issued at the date and at the time of the occurrence of the economic transaction or event, or the taking or execution of the economic measure, in Hungarian language.*
- **Pursuant to Article 169 (2) of the Sztv.:** *Accounting certificates directly and indirectly supporting the bookkeeping (including G / L accounts, analytical and / or detailed records), shall be preserved in a readable form for at least eight years, retrievable in a manner consistent with the accounting records.*

**Duration of the processing:**

- (a) In case of cancellation without legal consequences, the data will be deleted immediately;
- (b) In case of failure to conclude a contract or termination of a contract for a period of five (5) years after the failure to conclude a contract or termination of the contract;
- (c) In the case of issuance of accounting records, for 8 (eight) years from the date of issue;
- (d) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** no booking / contract is made for the given room.

**Data transmission:**

<b>Name of the recipient</b>	<b>Registered seat</b>	<b>Role</b>	<b>Data processing task</b>	<b>Legal basis</b>
<b>Maistro Informatics Ltd.</b>	1182 Budapest, Rudawszky u. 10	<b>Processor</b>	Owner and developer of the hotel and restaurant management software	<b>Processing is required for the performance of the contract</b>

**1.4. Check-in Process and Check-in Form**

Guests arriving at the Hotel prior to occupying the booked and confirmed room shall fill in a hotel check-in form, which contains the guest's personal information. The data of the check-in form is retained by the Controller on a hotel software and in hard copy.

<b>Scope of processed data for guests arriving from <u>third countries</u></b>	<b>Scope of processed data for guests arriving from <u>EEA-states</u></b>	<b>Purpose of processing</b>	<b>Lawfulness of processing</b>
<b>Name (Last name / First name)</b>	<b>Address (domicile or place of residence) [country, postal code, city, street, street number]</b>	Contacting the guest, Further contact, Identifying guests, Distinguishing guests from each other, Processing the room reservation request, Connecting the room and the guest concerned, Reserving the room concerned, Providing targeted service, Issuing an invoice, Complying with accounting obligations, Establishing a contract, Defining and modifying its content, Monitoring its fulfilment, Billing derived charges and enforcing claims related to it, Complying with reporting obligations, record-keeping obligations and tax return	<b>Consent</b>  <b>Compliance with legal obligations</b>  <b>Performance of the contract</b>
<b>Phone Number</b>			
<b>E-mail address</b>		Contacting the guest, Further contact, Providing targeted service	<b>Consent</b>
<b>Place and date of birth</b>		Processing the room reservation request, Connecting the room and the guest concerned, Reserving the room concerned, Providing targeted service,	<b>Consent</b>  <b>Compliance with legal obligations</b>

		Issuing an invoice, Complying with accounting obligations, Establishing a contract, Defining and modifying its content, Monitoring its fulfilment, Billing derived charges and enforcing claims related to it, Complying with reporting obligations and record-keeping obligations	<b>Performance of the contract</b>
<b>Mother's name</b>	-	Contacting the guest, Further contact, Identifying guests, Distinguishing guests from each other, Processing the room reservation request, Connecting the room and the guest concerned, Reserving the room concerned, Establishing a contract, Defining its content, Complying with reporting obligations and record-keeping obligations	<b>Consent</b> <b>Compliance with legal obligations</b> <b>Performance of the contract</b>
<b>Sex</b>	-		<b>Consent</b> <b>Compliance with legal obligations</b> <b>Performance of the contract</b>
<b>Nationality</b>		Complying with reporting obligations and record-keeping obligations	<b>Consent</b> <b>Compliance with legal obligations</b> <b>Performance of the contract</b>
<b>Passport ID number</b>		Identifying guests, Distinguishing guests from each other, Processing the room reservation request, Connecting the room and the guest concerned, Reserving the room concerned, Establishing a contract, Defining its content, Complying with reporting obligations and record-keeping obligations	<b>Consent</b> <b>Compliance with legal obligations</b> <b>Performance of the contract</b>
<b>Number of permit allowing entry or stay</b>	-	Complying with reporting obligations and record-keeping obligations	<b>Consent</b> <b>Compliance with legal obligations</b> <b>Performance of the contract</b>
<b>Place and time of entry</b>	-		<b>Consent</b> <b>Compliance with legal obligations</b> <b>Performance of the contract</b>
<b>License plate number</b>		Processing the room reservation request, Connecting the room and the guest concerned, Reserving the room concerned, Providing targeted service, Issuing an invoice, Complying with accounting obligations, Establishing a contract, Defining and modifying its content,	<b>Consent</b> <b>Compliance with legal obligations</b> <b>Performance of the contract</b>

	Monitoring its fulfilment, Billing derived charges and enforcing claims related to it	
<b>Debit / Credit card details (Card number, Cardholder's name, Validity period, Cvv code)</b>	Processing the room reservation request, Reserving the room concerned, Establishing a contract, Defining and modifying its content, Monitoring its fulfilment, Billing derived charges and enforcing claims related to it	<b>Consent</b>  <b>Performance of the contract</b>

#### Lawfulness of processing:

(a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

(b) Fulfilment of a contract - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (Article 6 (1) (b) of the GDPR);

- **Pursuant to Article 13/A (1) to (2) of the Ekertv.:** *The service provider may process the data of personal identity and address necessary to identify the person requesting the service for the purpose of establishing a contract on the provision of a service related to the information society, defining and modifying its content, monitoring its performance, billing the charges derived therefrom and enforcing claims related thereto. The service provider may process the natural data of personal identity related to the provision of a service related to the information society, address and data related to the date, time and place of use connected to the billing of charges derived from the contract on the provision of a service related to the information society.*

(c) Compliance with a legal obligation - processing is necessary for compliance with a legal obligation to which the Controller is subject; (Article 6 (1) (c) of the GDPR);

- **Pursuant to Article 166 (3) of the Sztv.:** *The accounting certificate must be issued at the date and at the time of the occurrence of the economic transaction or event, or the taking or execution of the economic measure, in Hungarian language.*
- **Pursuant to Article 169 (2) of the Sztv.:** *Accounting certificates directly and indirectly supporting the bookkeeping (including G / L accounts, analytical and / or detailed records), shall be preserved in a readable form for at least eight years, retrievable in a manner consistent with the accounting records.*
- *Pursuant to the authority as per Article 47 (1) (c) of the Stattu., Article 1 (a) of the OSTAPr. lays down a reporting obligation for legal persons engaged in economic activities in Hungary regarding data collection as per Section 2 (1) of Annex 12;*
- *Pursuant to the authority as per Article 1 (2) - (3), Article 9 (1) - (2) of the Önkrr. states: the person obliged to collect the tax shall record in a register (guestbook) the number of guest nights spent and the amount paid for accommodation. The register must include the guest's name, address, the number of guest nights spent as well as the accommodation charges and the amount of the tax collected;*
- **Pursuant to Article 73 (1) to (2) of the Hmtv.:** *a third-country national must inform the immigration authority of his / her accommodation by communicating the following information: a)*

the natural person identification data specified in Article 94; (b) the identification data of the travel document; (c) the address of the accommodation; d) the date of arrival to and expected departure from the accommodation; (e) the number of the visa or residence permit and (f) the date and place of entry. (2) The data of a third-country national staying in a commercial accommodation or other accommodation maintained by a legal entity referred to in paragraph (1) shall be registered by the host according to the standard form (guestbook);

- **Pursuant to Article 153 (1) to (2) of the Hmtv. vhr.:** The guestbook as per Article 73 (2) of the Act, containing information on the data of third-country nationals, may be managed at accommodations under the Act on Commerce and at non-profit community recreation locations (hereinafter referred to as 'Accommodation required to manage a guestbook') by a manual method (in the form of a book) or by a computer.

#### Duration of the processing:

- In case of cancellation without legal consequences, the data will be deleted immediately;
- In case of failure to conclude a contract or termination of a contract for a period of five (5) years after the failure to conclude a contract or termination of the contract;
- In the case of issuance of accounting records, for 8 (eight) years from the date of issue;
- Until the lapse of the right of establishing taxes,
- Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** no booking / contract is made for the given room.

#### Data transmission:

Name of the recipient	Registered seat	Role	Data processing task	Legal basis
<b>Hungarian Central Statistical Office</b>	1024 Budapest, Károly Károly u. 5-7.	<b>Independent Controller</b>	-	<b>Compliance with legal obligations</b>
<b>Budapest Capital District VII Erzsébetváros Municipality</b>	1073 Budapest Erzsébet krt.6. 1076 Budapest Garay u.5.	<b>Independent Controller</b>	-	<b>Compliance with legal obligations</b>
<b>Immigration and Asylum Office</b>	1117 Budapest, Budafoki út 60.	<b>Independent Controller</b>	-	<b>Compliance with legal obligations</b>
<b>Maistro Informatics Ltd.</b>	1182 Budapest, Rudawszky u. 10.	<b>Processor</b>	Owner and developer of the hotel and restaurant management software	<b>Processing is required for the performance of the contract</b>

## 2. Processing Related to Services

### 2.1. Magnetic Card Access Control System

The Controller allows guests to access the Hotel areas, especially the reserved room by using a magnetic card.

The Controller's employee enters into the Maistro management software used by the Controller data as per Sections 1.2 - 1.4. and the following data of the Guest:

Processed data	Purpose of processing	Lawfulness of processing
<b>Name (Last name / First name)</b>	Personal and property protection, Prevention and detection of perpetration, Surprising the perpetrator, as well as proof of violations and the recording of the fact of entry	<b>Consent Performance of the contract Enforcement of a legitimate interest</b>

and connects them with the data concerning the **room number, magnetic card number, magnetic card recording date, arrival date** (booking data), **departure date** (booking data).

After that, the employee of the Controller writes the magnetic card, which means that on the magnetic card the room number, the days of arrival and departure are being recorded. The personal data of the guest will not be recorded on the magnetic card.

**Lawfulness of processing:**

(a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

(b) Fulfilment of a contract - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (Article 6 (1) (b) of the GDPR);

(c) Enforcement of a legitimate interest - processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6 (1) (f) of the GDPR; the Controller has a legitimate interest in the protection of personal and property rights)

**Duration of the processing:**

(a) In case of reservation cancellation without legal consequences, the data will be deleted immediately;

(b) In case of failure to conclude a contract or termination of a contract for a period of five (5) years after the failure to conclude a contract or termination of the contract;

(c) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** no booking / contract is made for the given room.

**Data transmission:**

Name	Registered seat	Role	Data processing task	Legal basis
<b>Maistro Informatics Ltd.</b>	1182 Budapest, Rudawszky u. 10.	<b>Processor</b>	Owner and developer of the hotel and restaurant management software	<b>Processing is required for the performance of the contract</b>

## 2.2. Processing Related to Payment:

The Controller ensures that, in addition to or instead of cash, the Guest may settle up for the offset of the products / services from a bank account or debit card (including credit cards).

Processed data	Purpose of processing	Lawfulness of processing
Bank account number	Payment transactions, Hotel reservations or performance of a contract	<b>Consent</b>  <b>Performance of the contract</b>
Cardholder's name		
Card number		
Expiry date		
CVV code		

### Lawfulness of processing:

(a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

(b) Fulfilment of a contract - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (Article 6 (1) (b) of the GDPR);

### Duration of the processing:

(a) In case of reservation cancellation without legal consequences, the data will be deleted immediately;

(b) In case of failure to conclude a contract or termination of a contract for a period of five (5) years after the failure to conclude a contract or termination of the contract;

(c) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** no booking / contract is made for the given room.

**Data transmission:** the data is handled by the contractual partner of the Controller, details of which can be obtained from the website [www.otp.hu](http://www.otp.hu).

Name	Registered seat	Role	Data processing task	Legal basis
OTP Bank Plc.	1051 Budapest, Nádor utca 16.	Independent Controller	-	Processing is required for the performance of the contract

## 2.3. Shuttle Service

The Controller will arrange for the guest's transfer / airport shuttle transfer from the airport (Ferenc Liszt International Airport) to and from the Hotel prior to booking.

Processed data categories	Purpose of processing	Lawfulness of processing
Name (Last name / First name)	Contacting the guest, Further	Consent

<b>Date of arrival / departure</b>	Contact, Identifying the guest, Distinguishing guests from each other, Providing targeted service, Establishing a contract, Defining and modifying its content, Monitoring its fulfilment, Billing derived charges and enforcing claims related to it	<b>Compliance with legal obligations</b>  <b>Performance of the contract</b>
<b>Flight number</b>		
<b>Number of persons to be transported</b>		

**Lawfulness of processing:**

(a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

(b) Fulfilment of a contract - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (Article 6 (1) (b) of the GDPR);

- **Pursuant to Article 13/A (1) to (2) of the Ekertv.:** *The service provider may process the data of personal identity and address necessary to identify the person requesting the service for the purpose of establishing a contract on the provision of a service related to the information society, defining and modifying its content, monitoring its performance, billing the charges derived therefrom and enforcing claims related thereto. The service provider may process the natural data of personal identity related to the provision of a service related to the information society, address and data related to the date, time and place of use connected to the billing of charges derived from the contract on the provision of a service related to the information society.*

(c) Compliance with a legal obligation - processing is necessary for compliance with a legal obligation to which the Controller is subject; (Article 6 (1) (c) of the GDPR);

- **Pursuant to Article 166 (3) of the Sztv.:** *The accounting certificate must be issued at the date and at the time of the occurrence of the economic transaction or event, or the taking or execution of the economic measure, in Hungarian language.*
- **Pursuant to Article 169 (2) of the Sztv.:** *Accounting certificates directly and indirectly supporting the bookkeeping (including G / L accounts, analytical and / or detailed records), shall be preserved in a readable form for at least eight years, retrievable in a manner consistent with the accounting records.*

**Duration of the processing:**

- (a) In case of cancellation without legal consequences, the data will be deleted immediately;
- (b) In case of failure to conclude a contract or termination of a contract for a period of five (5) years after the failure to conclude a contract or termination of the contract;
- (c) In the case of issuance of accounting records, for 8 (eight) years from the date of issue;
- (d) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** In such case no contract shall be concluded for the given service.

**Data transmission:**

<b>Name of the recipient</b>	<b>Registered seat</b>	<b>Role</b>	<b>Data processing task</b>	<b>Legal basis</b>
<b>MB ELIT LUXURY Limited Liability Company</b>	1087 Budapest, Kerepesi út 15	<b>Processor</b>	Direct delivery of a transfer service	<b>Processing is required for the performance of the contract</b>

**2.4. Parking Service**

In the case of a prior reservation, the Controller provides its guests with a parking service in its private parking lot for a specified period of time.

<b>Processed data categories</b>	<b>Purpose of processing</b>	<b>Lawfulness of processing</b>
<b>Name (Last name / First name)</b>	Contacting the guest, Further contact, Identifying guests, Distinguishing guests from each other, Providing targeted service, Establishing a contract, Defining and its content, Monitoring its fulfilment, Billing derived charges and enforcing claims related to it	<p><b>Consent</b></p> <p><b>Compliance with legal obligations</b></p> <p><b>Performance of the contract</b></p>
<b>Time of arrival and</b>		
<b>License plate number</b>		

**Lawfulness of processing:**

(a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

(b) Fulfilment of a contract - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (Article 6 (1) (b) of the GDPR);

- Pursuant to Article 13/A (1) to (2) of the Ekertv.:** *The service provider may process the data of personal identity and address necessary to identify the person requesting the service for the purpose of establishing a contract on the provision of a service related to the information society, defining and modifying its content, monitoring its performance, billing the charges derived therefrom and enforcing claims related thereto. The service provider may process the natural data of personal identity related to the provision of a service related to the information society, address and data related to the date, time and place of use connected to the billing of charges derived from the contract on the provision of a service related to the information society.*

(c) Compliance with a legal obligation - processing is necessary for compliance with a legal obligation to which the Controller is subject; (Article 6 (1) (c) of the GDPR);

- **Pursuant to Article 166 (3) of the Sztv.:** *The accounting certificate must be issued at the date and at the time of the occurrence of the economic transaction or event, or the taking or execution of the economic measure, in Hungarian language.*
- **Pursuant to Article 169 (2) of the Sztv.:** *Accounting certificates directly and indirectly supporting the bookkeeping (including G / L accounts, analytical and / or detailed records), shall be preserved in a readable form for at least eight years, retrievable in a manner consistent with the accounting records.*

**Duration of the processing:**

- (a) In case of cancellation without legal consequences, the data will be deleted immediately;
- (b) In case of failure to conclude a contract or termination of a contract for a period of five (5) years after the failure to conclude a contract or termination of the contract;
- (c) In the case of issuance of accounting records, for 8 (eight) years from the date of issue;
- (d) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** In such case no contract shall be concluded for the given service.

## 2.5. Processing Related To Mailing

Guests have the option of establishing direct contact with the Controller via the web site of the Controller or by means of electronic mailing.

Processed data	Purpose of processing	Lawfulness of processing
Name (Last name / First name)	Contacting the guest, Further contact, Identifying guests, Distinguishing guests from each other, Providing targeted service	Consent
E-mail address		
Mail contents		

**Lawfulness of processing:**

- (a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

**Duration of the processing:**

- (a) Until the guest's consent is withdrawn;

## 2.6. Guestbook, Handling of Quality-Related Customer Complaints

The Controller provides the guest the opportunity to write an opinion, comment or complaint to be examined to the guestbook available at the reception desk, by simultaneously providing his / her data, or by the Controller taking minutes about the complaint.

Processed data categories (in particular in case of a complaint)	Purpose of processing	Lawfulness of processing
Name (Last name / First name)	Contacting the guest, Further contact, Providing targeted service	Consent
Address (domicile or place of residence)		Compliance with legal obligations

[country, postal code, city, street, street number]	Handling of quality complaints about the services provided by the Controller	Performance of the contract
Place, time and way of submitting the complaint		
Detailed description of the guest complaint		
List of records, documents and other evidence presented by the guest		
Signature of the person who has written the minutes and		
Place and date where the minutes have been		

**Lawfulness of processing:**

(a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

(b) Fulfilment of a contract - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (Article 6 (1) (b) of the GDPR);

(c) Compliance with a legal obligation - processing is necessary for compliance with a legal obligation to which the Controller is subject; (Article 6 (1) (c) of the GDPR);

- **Pursuant to Article 17/A (5) Fgytv.:** *the minutes drawn up on the complaint must include the following:*
  - a) name and address of the consumer;
  - b) place, time and way of submitting the complaint;
  - c) a detailed description of the consumer's complaint, any records presented by the consumer, list of documents and other evidence;
  - d) a statement by the company on its position regarding the consumer complaint, in case the immediate investigation of the complaint is possible;
  - e) the name of the person drawing up the minutes and the signature of the consumer - with the exception of oral complaints communicated by phone or with the use of other means of electronic communication;
  - f) place and date where the minutes were recorded;
  - g) in case of oral complaints communicated via phone or with the use of other means of electronic communication, the unique identification number of the complaint.
- **Pursuant to Article 17/A (7) Fgytv.:** *The company shall retain the minutes and the copy of the reply recorded on the complaint for five years, and it shall present them to the supervising authorities on request.*

**Duration of the processing:**

- (a) Minutes (on complaint) shall be retained for 5 (five) years following their record;
- (b) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** the data subject cannot exercise his/her consumer rights.

**Data transmission:** The Controller shall retain the minutes and the copy of the reply recorded on the complaint, and it shall present them to the supervising authorities on request.

## 2.7. Processing Related to Other Services

Guests have the option of ordering or requesting different (surplus, special comfort) services from the Controller during their stay, whether directly related to the hotel reservation or independently.

Service	Processed data categories	Purpose of processing	Lawfulness of processing
Accompanying program / Ladies' program	Name (Last name / First name)	Contacting the guest, Further contact, Identifying guests, Distinguishing guests from each other, Providing targeted service, Establishing a contract, Defining and modifying its content, Monitoring its fulfilment, Billing derived charges and enforcing claims related to it	Consent  Compliance with legal obligations  Performance of the contract
Ticket booking and sales			
Car rental			
Health (medical) services			
Babysitter			
Washing, cleaning, ironing			
Individual guided tours			
Recommendation and booking of bus, boat and helicopter sightseeing tours			
Recommendation and reservation of restaurants, cafes and confectioneries			
Rental of bicycles, cars and strollers			
Fitness			
Wellness			
Massage	Name (Last name / First name)  See the health questionnaire as per <b>Annex 2</b>		

### Lawfulness of processing:

(a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

Regarding health data pursuant to **Annex 2** of this Policy, Article 9 (2) (a) and (h) and paragraph 3 of the GDPR shall prevail:

- (1) Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.
- (2) Paragraph 1 shall not apply if one of the following applies:
  - (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law

provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

(h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

(3) Personal data referred to in paragraph 1 may be processed for the purposes referred to in point (h) of paragraph 2 when those data are processed by or under the responsibility of a professional subject to the obligation of professional secrecy under Union or Member State law or rules established by national competent bodies or by another person also subject to an obligation of secrecy under Union or Member State law or rules established by national competent bodies.

(b) Fulfilment of a contract - processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (Article 6 (1) (b) of the GDPR);

- **Pursuant to Article 13/A (1) to (2) of the Ekertv.:** *The service provider may process the data of personal identity and address necessary to identify the person requesting the service for the purpose of establishing a contract on the provision of a service related to the information society, defining and modifying its content, monitoring its performance, billing the charges derived therefrom and enforcing claims related thereto. The service provider may process the natural data of personal identity related to the provision of a service related to the information society, address and data related to the date, time and place of use connected to the billing of charges derived from the contract on the provision of a service related to the information society.*

(c) Compliance with a legal obligation - processing is necessary for compliance with a legal obligation to which the Controller is subject; (Article 6 (1) (c) of the GDPR);

- **Pursuant to Article 166 (3) of the Sztv.:** *The accounting certificate must be issued at the date and at the time of the occurrence of the economic transaction or event, or the taking or execution of the economic measure, in Hungarian language.*
- **Pursuant to Article 169 (2) of the Sztv.:** *Accounting certificates directly and indirectly supporting the bookkeeping (including G / L accounts, analytical and / or detailed records), shall be preserved in a readable form for at least eight years, retrievable in a manner consistent with the accounting records.*

#### **Duration of the processing:**

- (a) In case of cancellation without legal consequences, the data will be deleted immediately;
- (b) In case of failure to conclude a contract or termination of a contract for a period of five (5) years after the failure to conclude a contract or termination of the contract;
- (c) In the case of issuance of accounting records, for 8 (eight) years from the date of issue;
- (d) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** In such case no contract shall be concluded for the given service.

**Data transmission:**

Service	Name of the recipient	Registered seat	Role	Data processing task	Legal basis
Washing, cleaning, ironing	'M & G' COLLECTION Ltd.	1068 Budapest, Szófia utca 8.	Processor	Direct delivery of a given service	Processing is required for the performance of the contract
Health (medical) services	PRIVÁT DOCTOR Ltd.	1052 Budapest, Városház u. 14. III. em. 2.	Independent Controller	-	
Ticket booking and sales	Not predetermined	-			
Car rental					
Babysitter					
Accompanying program / Ladies' program					
Individual guided tours					
Recommendation and booking of bus, boat and helicopter sightseeing tours					
Recommendation and reservation of restaurants, cafes and confectioneries					
Rental of bicycles, cars and strollers					

### 3. Protection of persons and property

#### 3.1. Lost and Found Objects

The Controller keeps records of the objects found in the room and / or the lobby area after the guest has left.

Processed data categories	Purpose of processing	Lawfulness of processing
Room number	Records of lost and found objects, Notification of the owner, Return of the object found	Consent  Compliance with legal obligations
Date of finding the		
Designation of the object		
Name of the recipient		

**Lawfulness of processing:**

- (a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);
- (b) Compliance with a legal obligation - processing is necessary for compliance with a legal obligation to which the Controller is subject; (Article 6 (1) (c) of the GDPR);

- **Pursuant to Articles 5:54- 5:64 of the Ptk.:** *Items found in a building or room that are open to the public are to be handed over to the operator's staff without delay. Ownership of such a thing cannot be claimed by the finder. If the person authorized to receive the found item can be identified, the operator shall notify him/her and will hand it over to him/her without delay. If the person authorized to receive cannot be identified, the operator shall retain the item for three months after the handover or, if no retention is possible, to the notary within eight days of the handover. If the claimant does not appear for the item within three months, the operator or the notary shall sell it.*

**Duration of the processing:**

- (a) The data will be erased and destroyed upon receipt by the owner of the object found or in case of a handover to the notary following the handover;
- (b) In the case of sales, following 1 (one) year from the date of the finding;
- (c) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** the Controller cannot fulfil its statutory obligation.

**3.2. Electronic Surveillance System**

Within the Hotel area, the Controller operates an electronic surveillance system (video surveillance system). The security cameras are located as follows and serve the monitoring of the following areas / premises:

Camera Location	Camera ID	Camera Name	Monitored Area/Object	Camera Type
Garage	N/A	Garage Lift Lobby	Garage	Digital
External Areas	N/A	ARAZ Restaurant Exterior	Dohány Street frontage	Digital
External Areas	N/A	Main Entrance	Klauzál Street frontage	Digital
External Areas	N/A	Nyár Street Exterior	Nyár Street	Digital
External Areas	N/A	Staff Entrance	Staff Entrance	Digital
Parking Level	N/A	Main Garage Staircase	Garage	Digital
Parking Level	N/A	Garage – Klauzál Street	Garage	Digital
Parking Level	N/A	Garage – Nyár Street	Entrance	Digital
Parking Level	N/A	Beverage Storage Room	Garage	Digital
Parking Level	N/A	Entry Barrier	Vehicle ramp – inbound	Digital
Parking Level	N/A	Exit Barrier	Vehicle ramp – outbound	Digital
Parking Level	N/A	Staff Lift	Garage	Digital
Ground Floor	N/A	ARAZ Restaurant Bar Counter	Restaurant bar counter and entrance	Digital

Ground Floor	N/A	ARAZ Restaurant Entrance	Entrance and side tables	Digital
Ground Floor	N/A	ARAZ Triplex Entrance	Lift and restaurant entrance from lobby	Digital
Ground Floor	N/A	Back Office	Internal office area	Digital
Ground Floor	N/A	Security Office	Security area	Digital
Ground Floor	N/A	Package Room	Package storage and entrance	Digital
Ground Floor	N/A	Foyer	Indoor corridor	Digital
Ground Floor	N/A	Gallery Bar Counter	Café	Digital
Ground Floor	N/A	Gallery Bar	Café	Digital
Ground Floor	N/A	Gallery Guest Computer	Lounge area	Digital
Ground Floor	N/A	Hungária Corridor	Indoor corridor	Digital
Ground Floor	N/A	Hungária Lift	Hungária conference room	Digital
Ground Floor	N/A	Kitchen	Production kitchen	Digital
Ground Floor	N/A	Lobby	Entrance hall	Digital
Ground Floor	N/A	Reception 1	Reception desk	Digital
Ground Floor	N/A	Reception 2	Reception desk	Digital
Ground Floor	N/A	Reception 3	Reception desk and lifts	Digital
Ground Floor	N/A	Event Rooms	Conference rooms	Digital
Ground Floor	N/A	Staff Dining Corridor	Refrigerators and stair access	Digital
1st Floor	N/A	1st Floor – Nyár Street Wing	Indoor corridor	Digital
1st Floor	N/A	1st Floor Triplex	Lift lobby	Digital
1st Floor	N/A	1st Floor – Klauzál Street Wing	Indoor corridor	Digital
1st Floor	N/A	1st Floor Deluxe Wing	Indoor corridor	Digital
2nd Floor	N/A	2nd Floor – Nyár Street Wing	Indoor corridor	Digital
2nd Floor	N/A	2nd Floor Triplex	Lift lobby	Digital
2nd Floor	N/A	2nd Floor – Klauzál Street Wing	Indoor corridor	Digital
2nd Floor	N/A	2nd Floor Deluxe Wing	Indoor corridor	Digital
3rd Floor	N/A	3rd Floor – Nyár Street Wing	Indoor corridor	Digital

3rd Floor	N/A	3rd Floor Triplex	Lift lobby	Digital
3rd Floor	N/A	3rd Floor Connecting Corridor	Indoor corridor	Digital
3rd Floor	N/A	3rd Floor – Klauzál Street Wing	Indoor corridor	Digital
3rd Floor	N/A	Minibar Storage Room	Storage room	Digital
3rd Floor	N/A	3rd Floor Deluxe Wing	Indoor corridor	Digital
4th Floor	N/A	4th Floor – Nyár Street Wing	Indoor corridor	Digital
4th Floor	N/A	4th Floor Triplex	Lift lobby	Digital
4th Floor	N/A	4th Floor Connecting Corridor	Indoor corridor	Digital
4th Floor	N/A	4th Floor – Klauzál Street Wing	Indoor corridor	Digital
4th Floor	N/A	4th Floor Deluxe Wing	Indoor corridor	Digital
5th Floor	N/A	5th Floor – Nyár Street Wing	Indoor corridor	Digital
5th Floor	N/A	5th Floor Triplex	Lift lobby	Digital
5th Floor	N/A	5th Floor – Klauzál Street Wing	Indoor corridor	Digital
5th Floor	N/A	5th Floor Deluxe Wing	Indoor corridor	Digital
6th Floor	N/A	6th Floor – Nyár Street Wing	Indoor corridor	Digital
6th Floor	N/A	6th Floor Triplex	Lift lobby	Digital
6th Floor	N/A	6th Floor Connecting Corridor	Indoor corridor	Digital
6th Floor	N/A	6th Floor – Klauzál Street Wing	Indoor corridor	Digital
6th Floor	N/A	6th Floor Deluxe Wing	Indoor corridor	Digital
7th Floor	N/A	7th Floor Lift Lobby	Lift lobby	Digital
7th Floor	N/A	Indoor Pool	Pool area	Digital

**Purpose of data processing:** the prevention and detection of perpetration for the protection of human life, physical integrity and property; surprising the perpetrator, as well as proof of

perpetrations, the identification of unauthorized entrants to the Hotel, the recording of the fact of entry, the documentation of the activities of unauthorized persons, investigation of the possible occurrence of the circumstances of work and other accidents.

**Lawfulness of processing:**

(a) In case of entering the Hotel area, consent of the guest - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);

(b) Enforcement of a legitimate interest - processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6(1) (f) of the GDPR; the Controller has a legitimate interest in the protection of personal and property rights)

**Processed data categories:** the image of the persons entering the Hotel as well as other personal details recorded by the surveillance system.

**Duration of data processing:** 30 (thirty) days without any further use;

**Pursuant to Article 31 (3) of the Szvmtv.:** *recorded images, sound, as well as image and sound recordings not used up to thirty days after recording shall be destroyed or deleted if the recording was carried out*

*a) at a public event for the protection of human life, physical integrity or personal freedom,*

*b) at a public event, at a public transport vehicle station or stop (e.g. train station, airport, metro stop) for the prevention of terrorist acts or public menace,*

*c) for the safe storage, handling and transportation of money, securities, precious metals and gems of significant value under the Act on the Criminal Code*

*d) for the protection of dangerous substances.*

**Use of recordings**

**Person authorized to view the current image of the cameras:** the Controller's authorized employees.

**Person authorized to view the camera recordings:** the Controller's authorized employees.

**Person authorized to record the camera recordings on a data carrier:** the Controller's authorized employees.

The stored recordings of the camera surveillance and recording system operated by the Controller can only be viewed by authorized persons solely for the purpose of demonstrating violations of human life, physical integrity and property as well as in order to identify the perpetrator. Any data subject whose right or legitimate interest is affected by the recording of an image can request with the justification of his or her right or legitimate interest the recording not to be cancelled or deleted by the Controller until the court or the authority is requested, but for a maximum of 30 days. The person on the record may ask for information about the recording made by the electronic surveillance system, request a copy, or if there is another person present in the recording, can gain insight into the recording. The data subject may request the deletion of the recording on him/her, the modification of the recording data or may object to the processing. The Controller records the insights into the stored recordings, the name of the person performing it, the reason and the time of gaining insight to the data by taking minutes.

**Data transfer:** in the case of an offense or criminal procedure, to the authorities, courts and tribunals that carry them out.

**Scope of the transmitted data:** images taken by the camera system with relevant information.

### **Lawfulness of data transfer**

- **Pursuant to Article 71 (1) of the Be.:** *The court, the public prosecutor and the investigating authority may turn to a public and local government body, authority, public body, business organization, foundation, public foundation and association for the provision of information, disclosure, transfer of data or filing of records, and may set a period between eight and thirty days for its completion. The requested party must restore all encrypted and hidden data to their original state prior to delivery or disclosure, and give access to the data for the requesting party. The requested party must provide the data supply free of charge, including the processing of data, the recording of data in writing or in electronic form, and the forwarding of data. The requested party must comply with the request within the set deadline, unless the law requires otherwise, or give notification of the hindrance of performance.*
- **Pursuant to Article 151 (2) (a) of the Be.:** *the court, the public prosecutor or the investigating authority shall order, with the exception of the property, the impoundment of the item, information system, data medium or data contained in such a system, which constitutes a means of proof;*
- **Pursuant to Article 171 (2) of the Be.:** *a member of the authority and the official person, and if required by a separate law, the public body is obliged to denounce a criminal offense known to him/her under his /her authority - if the perpetrator is known by indicating the person. The denunciation must be accompanied by the evidence, if this is not possible, their retention must be ensured.*
- **Pursuant to Article 75 (1) (a) of the Szabstv.:** *the authority dealing with administrative offences, the body conducting the preparatory procedure, and, for the offense for which a fine may be imposed on the ground under the law, the person authorized to impose a fine may impound and may temporarily confiscate the item constituting a physical evidence;*
- **Pursuant to Article 78 (3) of the Szabstv.:** *the denunciation must include a description of the place and time of the act being denounced, the description of the circumstances of the offense, the indication of the evidence and the known personal data of the person being prosecuted. If possible, the evidence must be attached to the denunciation.*

**Duration of the processing:**

- (a) In case of cancellation without legal consequences, the data will be deleted immediately;
- (b) In case of failure to conclude a contract or termination of a contract for a period of five (5) years after the failure to conclude a contract or termination of the contract;
- (c) In the case of issuance of accounting records, for 8 (eight) years from the date of issue;
- (d) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** no contract shall be concluded for the given service.

## 4. Other Types of Processing

### 4.1. Logging of the <https://continentalhotelbudapest.com/> Server

When visiting the website <https://continentalhotelbudapest.com/>, the web server automatically logs user activity.

Processed data categories	Purpose of processing	Lawfulness of processing
Date	While visiting the site, the Controller logs the visitor data in order to check the functionality of the services and to prevent abuse.	<p style="text-align: center;"><b>Consent</b></p> <p style="text-align: center;"><b>Enforcement of a legitimate interest</b></p>
Time		
User IP address		
IP address of visited page		
IP address of previously visited page		
Data related to the operating system of the user		

**Lawfulness of processing:**

- (a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);
- (b) Enforcement of a legitimate interest - processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6(1) (f) GDPR; the Controller has a legitimate interest in the safe operation of the website)

**Duration of the processing:** 90 (ninety) days after having visiting the site

**Data transmission:**

Name of the recipient	Registered seat	Role	Data processing task	Legal basis
<b>MORGENS Design Ltd.</b>	8800 Nagykanizsa, Csányi László utca 2.	<b>Processor</b>	Logging information necessary to operate the site, to enable functionality of visitor data and the website	<b>Processing is required for the performance of the contract</b>

**Further information:** the Controller does not link the data generated by the analysis of the log files with other information and does not attempt to identify the user. The addresses of the pages visited, as well as the date and time data are not suitable themselves for identifying the data subject, but after linking to other data (such as those provided during registration) they may be utilised to draw conclusions about the user.

**Data processing of external service providers related to logging:** the html code of the portal contains hyperlinks from and to an external server, independent from the Controller. The server of the external service provider is connected directly to the user's computer. We are reminding our visitors that the providers of these links are able to collect user data (e.g. IP address, browser and operating system details, cursor movement, visited page title, and time of visit) due to direct connection to their server and direct communication with the user's browser. The IP address is a series of numbers by which the computers and mobile devices of users on the Internet can clearly be identified. IP addresses can also geographically locate a visitor using that computer. The addresses of the pages visited, as well as the date and time data are not suitable themselves for identifying the data subject, but after linking to other data (such as those provided during registration) may be utilised to draw conclusions about the user.

#### 4.2. Processing related to Consumer Satisfaction Assessment

For the Controller it is of the utmost importance that guests receive the highest quality service, thus the Controller requests feedback from guests on their hotel experiences.

Processed data	Purpose of processing	Lawfulness of processing
E-mail address	Further development and continuous improvement of the services provided by the Controller	Consent
Name (Last name / First name)		Enforcement of a legitimate interest

**Lawfulness of processing:**

- (a) Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 6 (1) (a) of the GDPR);
- (b) Enforcement of a legitimate interest - processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (Article 6(1) (f) of the GDPR; the Controller has a legitimate interest in receiving information on the basis of the feedback to improve or develop its services)

**Duration of the processing:**

- (a) In case of reservation cancellation without legal consequences, the data will be deleted immediately;
- (b) In case of failure to conclude a contract or termination of a contract for a period of five (5) years after the failure to conclude a contract or termination of the contract;
- (c) Until the guest's consent is withdrawn;

**Consequences of failure to provide data:** the data subject does not receive a consumer satisfaction questionnaire.

**Data transmission:**

Name	Registered seat	Role	Data processing task	Legal basis
<b>CA Customer Alliance GmbH</b>	Ullsteinstr.130 l Tower B 12109 Berlin l Germany	<b>Processor</b>	Software owner, operation of a satisfaction assessment module	<b>Processing is required for the performance of the contract</b>

### 4.3. Application for Employment

The application materials, which contain the personal data of the data subjects and which are needed to fill any vacant positions on an ad hoc basis, are handled confidentially by the Controller. By voluntarily submitting your application, you agree that the Controller will store and manage the personal data he / she is aware of, until the end of the selection procedure. If you withdraw your application at your own discretion, personal data recorded during the procedure will be deleted immediately.

## V. Cookie Information

In order for the Controller's website to work as efficiently as possible, the Controller uses cookies, primarily the so-called session cookie, which is required to browse the site, use the features and enables, among other things, the user operations related to functions or services on the given site to be remembered.

Without using 'session cookies', the smooth use of the website cannot be guaranteed. Their expiration date extends for the duration of that visit, cookies are automatically deleted at the end of the session or when the browser is closed.

Otherwise, via the cookies a website recognizes recurring users and allows the Controller to collect data about its user behavior, for example, in which country the user has accessed the site, its browser software and operating system, its IP address, the pages it has viewed on the site and the features it has used.

A cookie is an information package of variable content sent by the web server that is stored on the user's computer and provides an opportunity to query some of its data. Cookies are short text files placed by the viewed websites on a user's computer browser, cell phone, or other device providing Internet access. Cookies will not connect to your system and will not harm your files. Cookies may be 'permanent' or 'temporary' ones. The permanent cookie is stored by the browser for a specific time, provided that the user does not delete it prior to that, while the temporary cookie is not stored by the browser and is automatically deleted by closing the browser. Cookies are 'passive', that is, they do not contain executable files, viruses or spyware, and do not have access to the user's hard drive data. Please note that these cookies alone cannot identify the visitor personally.

You can delete your cookie from your computer at any time or disable it in your browser settings.

## VI. Data processors

In general, only employees of the Controller have direct access to personal data provided by the data subjects.

The Controller primarily transmits personal data of the data subject to such addressees that are established within the European Union or which provide adequate guarantees (such as an EU-US Privacy Shield) that their data processing meets the requirements of GDPR. In addition, for destinations outside the European Union, out of administrative reasons personal data may be transmitted to a third country. The transmission of data is legitimate pursuant to Article 49

(1) (b) of the GDPR, given that the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken in response to the data subject's request.

In accordance with Article 13 (2) (f) of the GDPR, we hereby inform you that in the data processing activities of the Controller, no automated decision-making or profiling will take place.

### 6.1. Permanent Data Processors

<b>Name and address of the data processor</b>	<b>Purpose of data processing</b>	<b>Processed data categories</b>
<b>Navarino Services Limited</b> Navarino House, Network Point, Range Road, Witney, Oxfordshire, OX29 0YN, United Kingdom	Owner of the Navarino software, integrated into the booking system; the manager of the Navarino Internet Booking Engine (IBE)	<b>The data indicated in Section 1</b>
<b>Maistro Informatics Ltd.</b> 1182 Budapest, Rudawszky u. 10	Owner and developer of the hotel and restaurant management software	<b>The data indicated in Section 1</b>
<b>MORGENS Design Ltd.</b> 8800 Nagykanizsa, Csányi László utca 2	Logging information necessary to operate the site, to enable functionality of visitor data and the website	<b>The data indicated in Section 4.1</b>
<b>PIARSOFT Ltd.</b> 1134 Budapest, Csángó utca 4 / b.	Hosting services, site development and maintenance	<b>The data indicated in Section 4.1</b>
<b>CA Customer Alliance GmbH</b> Ullsteinstr.130   Tower B 12109 Berlin   Germany	Software owner, operation of a satisfaction assessment module	<b>The data indicated in Section 4.2</b>
<b>NPN.HU Ltd.</b> 1183 Budapest, Szil utca 11	Accounting	<b>The data required for carrying out of the accounting tasks indicated in Section 1</b>
<b>Hori-zone Ltd.</b> 1093 Budapest, Lónyai u. 11	Opening of the room safe	Guest name, room number
<b>'M &amp; G' COLLECTION Ltd.</b> 1068 Budapest, Szófia utca 8	Washing, cleaning, ironing	<b>The data indicated in Section 2.7</b>
<b>MB ELIT LUXURY Ltd.</b> 1087 Budapest, Kerepesi út 15	Direct delivery of a transfer service	<b>The data indicated in Section 2.3</b>

The Processor shall perform the processing in accordance with the instructions of the Controller, may perform no substantive decisions regarding processing, may process personal data that he or she has knowledge of only in accordance with the terms of the Controller, it may not perform data processing for its own purposes and is obliged to store and preserve personal data as required by the Controller. The Processor may not involve any further data processor without the prior or written authorization of the Controller.

## VII. Social Media Plug-Ins

The website may contain plug-ins ('plug-ins') of TripAdvisor LLC (400 1st Avenue Needham, MA 02494, USA; 'TripAdvisor'), Facebook Inc. (1601 S. California Ave, Palo Alto, CA 94304, USA; 'Facebook' and 'Instagram'); YouTube LLC), Google LLC ( 1600 Amphitheater Parkway in Mountain View, California, USA, 'Google+'), and Pinterest Inc. (651 Brannan Street, San Francisco, CA 94103) / Pinterest-Europe Ltd. (Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland). The related services are provided by TripAdvisor, Facebook, YouTube, Google+ or Pinterest (collectively referred to as 'Service Providers'). The plug-in will forward to the Service Providers information on which websites you have opened. If you are logged in to your user account while browsing our Website, Service Providers can compare the information you are interested in (that is, information you have reached) with your user account. When using plug-in functions (for example commenting), the browser will forward this information directly to the Service Providers for retention.

For more information about Facebook's privacy policy, please see the link below:  
<http://www.facebook.com/policy.php>

For more information about TripAdvisor's privacy policy, please see the link below:  
<https://tripadvisor.mediaroom.com/UK-privacy-policy>

For more information on Instagram's privacy policy, please see the link below:  
[https://help.instagram.com/519522125107875?helpref=page\\_content](https://help.instagram.com/519522125107875?helpref=page_content)

For more information on privacy policies of Google+ and YouTube, please see the link below: <https://policies.google.com/privacy?hl=hu>

For more information on Pinterest's privacy policy, please see the link below:  
<https://policy.pinterest.com/hu/privacy-policy>

If you want to avoid that the Service Providers link the visiting of our website to your user account, you must log out of the user accounts prior to opening our website.

## VIII. Data Security Measures and the Way Data Is Processed

The Controller shall ensure that the data security is proportionate to the risk and shall take the technical and organizational measures and establish the procedural rules, which are necessary to enforce the provisions of the GDPR, the Infotv. and other privacy and data protection rules.

The Controller shall protect data by risk-proportionate measures against any unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as any unintentional destruction or damage or unavailability resulting from a change in the technique used. Within this framework, the Controller stores your personal information in a password-protected and / or encrypted database. The Controller protects the data within the framework of a risk-proportional protection with firewalls, antivirus software, encryption mechanisms, content filtering, and other technical and process solutions. Privacy incidents are being continuously monitored.

The Controller stores hard copy and personal data files in a lockable room equipped with fire and property protection. Manually handled documents containing personal data are filed in order to fulfil the retention obligation of the Controller, which room shall also be a lockable area with fire and property protection.

## **IX. Rights of the Data Subject and Enforcement Options**

You may exercise your rights listed in the following points by submitting an oral or written request to the Controller. The contact details of the Controller are provided in Section II of the Policy.

### **1. Information on the Treatment of Your Personal Data**

At the request of the data subject, the Controller shall provide information on the data it manages or a data processor has processed upon its assignment or its commission, their source, the purpose of the processing, its legal basis and duration, the name and address of the Processor, activities related to processing, conditions and effects of the privacy incident as well as the preventative measures taken, and in case of the transmission of the data subject's personal data, the legal basis of the transfer and its recipient.

Upon the data subject's request, the Controller shall provide information in writing, in a clearly understandable form, as soon as possible, but no later than 25 days following the submission of the request.

### **2. Access to Personal Data**

The data subject has the right to be informed by the Controller if any of its personal data are being processed, and if so, it has the right to access such personal data and the following information:

- a) the purposes of processing;
- b) the categories of the personal data concerned;
- c) the recipients or categories of recipients to whom or which personal data were disclosed or will be disclosed, including in particular third country recipients or international organizations;

- d) where appropriate, the intended duration of the storage of personal data or, where this is not possible, the criteria for determining that period;
- e) the right of the data subject to request the Controller rectification, erasure or restriction of the processing of its personal data, and to object to the processing of its personal data;
- f) the right to lodge a complaint addressed to a supervisory authority;
- g) if the data was not collected from the data subject, all available information about their source;
- h) the fact of an automated decision-making, including profiling, and at least in such cases, the logic used and the understandable information about the nature of such processing and the likely consequences regarding the data subject.

Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed about the appropriate guarantees regarding the transfer.

On request, the Controller shall provide the data subject with one copy of the processed personal data. The Controller may charge the data subject a reasonable administration fee for any additional copies by. If the application has been submitted electronically, the information should be provided in a widely used electronic format, unless otherwise requested by the data subject.

The right to request a copy should not adversely affect the rights and freedoms of others.

### **3. Right to Rectification**

The data subject shall have the right to make the Controller rectify its incorrect personal data immediately. Taking into account the purpose of processing, the data subject has the right to request the completion of incomplete personal data, including by means of a supplementary statement.

### **4. Right of Erasure (so-called ‘right to be forgotten’):**

The data subject shall have the right to request the Controller erasure of its personal data without undue delay and the Controller shall delete the personal data of the data subject without undue delay, if one of the following reasons exists:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws its consent on which the data processing is based, and there is no other legal ground for the processing;
- c) the data subject objects to the data processing, and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;

e) the personal data have to be erased for compliance with a legal obligation as per a Union or Member State law to which the Controller is subject;

f) the personal data have been collected in relation to the offering of information society services.

If the Controller has made the personal data public and is obliged pursuant to the above to erase such personal data, by taking account of available technology and the cost of implementation, the Controller shall take reasonable steps to inform Controllers processing the data that the data subject has requested the erasure by such controllers of any links to those personal data, or their copy or replication.

Deletion of data cannot be initiated if processing is required for the following reasons: to exercise the right to freedom of expression and the right of information; the fulfilment of an obligation under a Union or Member State law for the processing of personal data, applicable to the Controller, or for the performance of a task carried out of public interest or in the exercise of a public authority delegated to the Controller; for the purpose of archiving, scientific and historical research or for statistical purposes in the public health field, out of public interest; or for the submission, enforcement or protection of legal claims.

## **5. Right to Restriction of Processing**

The data subject shall have the right to request that the Controller restrict the processing if one of the following conditions is met:

a) the data subject contests the accuracy of the personal data; such restriction shall be valid for a period enabling the Controller to verify the accuracy of the personal data;

b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;

c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the submission, enforcement or protection of legal claims;

d) the data subject has objected to processing; in this case, such restriction shall be valid for a period until it is determined whether the legitimate grounds of the Controller override those of the data subject.

Where processing has been restricted pursuant to the above, such personal data shall, with the exception of storage, only be processed with the consent of the data subject or for the submission, enforcement or protection of your legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

Prior to the discontinuation of the limitation of processing, the Controller informs the data subject at whose request the processing has been restricted.

The Controller shall inform each recipient of any rectification, erasure or restriction related to processing, whom or which the personal data have been disclosed to, unless this proves impossible or requires a disproportionate effort. At the request of the data subject, the Controller informs it on the recipients.

## 6. Right to Data Portability

The data subject shall have the right to receive personal data to be provided to the Controller in a widely used, machine-readable format and shall be entitled to transfer these data to another Controller without being obstructed by the Controller to whom it has provided personal information, if:

- a) the processing is based on the consent of the data subject or a contract; and
- b) the processing is carried out in an automated way.

In exercising the right to data portability as described above, the data subject is entitled to request the direct transfer of personal data between Controllers, if technically feasible. The exercise of this right shall be without prejudice to the right to erasure. This right does not apply in the case where the processing is required for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller. The right referred to in this paragraph shall not adversely affect the rights and freedoms of others.

## 7. Right of Withdrawal

The data subject has the right to withdraw its consent to the processing of its personal data at any time, the exercise of which right does not affect the lawfulness of the processing performed on a basis of a consent prior to withdrawal.

## 8. Lodging a Complaint with a Supervisory Authority

In order to enforce the right to the protection of personal data, it is possible to apply to the National Data Protection and Information Authority, based on which application a proceeding of the data protection authority can be launched. If the proceeding of the data protection authority is preceded by an investigation based on notification, the notifying person shall be notified of the initiation or termination of the data protection authority proceedings.

Name: National Authority for Data Protection and Freedom of Information

Headquarters: 1125 Budapest, Szilágyi Erzsébet fasor 22/C

Mailing address: 1530 Budapest, P.O. Box 5

Phone number: +36 1 391 1400

Fax: +36 1 391 1410

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Homepage: <http://www.naih.hu>

## 9. Right to Apply to the Courts

The data subject may apply to the court in case of violations of its rights. Such court proceedings shall be conducted under priority. The Controller shall demonstrate that processing is in compliance with the law. The lawsuit can be initiated by the data subject, according to its choice, before the competent court of domicile or place of residence. Also such party may be involved in the action which otherwise has no legal capability in the lawsuit. For the sake of success, the National Authority for Data Protection and Freedom of Information can intervene in the case in question.

If the court upholds the application, the Controller is required to provide information, rectification, blocking, deletion of data and annulment of the decision by automated data processing and taking into account the right of protest of the data subject.

The court may order the disclosure of its judgment by publishing the identifying data of the Controller by publishing it, if it is required by the interests of data protection and by a greater number of data subjects protected by this Act.

## X. Information on a Privacy Incident (Breach)

If the privacy incident is likely to pose a high risk to the rights and freedoms of natural persons, the Controller shall inform the data subject of the privacy incident without undue delay.

The information provided to the data subject must clearly and easily disclose the nature of the privacy incident and shall include at least the name and contact details of the informing contact person, the likely consequences of the privacy incident and any actions taken or planned by the data controller to remedy the privacy incident, including measures to mitigate the possible adverse consequences of the privacy incident.

The data subject shall not be informed if any of the following conditions are met:

- a) the Controller has implemented appropriate technical and organizational protection measures and applies these measures to data covered by the privacy incident, in particular measures such as the use of encryption that make it impossible for persons who are not entitled to gain access to personal data;
- b) the Data Controller has taken further measures following the privacy incident to ensure that the high risk for the rights and freedoms of the data subject is no longer likely to be realized;
- c) the provision of the information would involve a disproportionate effort. In such cases, the data subject shall be informed by means of publicly disclosed information or a similar measure shall be taken to ensure that information of the data subject is equally effective.

If the Controller has not yet notified the data subject of the privacy incident, the supervisory authority may, after considering whether the privacy incident is likely to pose a high risk, impose the informing of the data subject or determine whether one of the necessary conditions has been met.

## **XI. Final Provisions**

We hereby inform you that, for the purpose of providing information, transferring information or submitting documents, other bodies may turn to the Controller, by virtue of the authority of the court, the public prosecutor, the investigating authority, the offending authority, the administrative authority and the National Data Protection and Information Authority.

The Controller will provide to the authorities only the extent of personal data essential for the implementation of the objective of the inquiry, if the authority has specified the objective and the scope of the data.

Detailed information on processing activities not included in the Policy is given when data is recorded. The Controller reserves the right to modify the contents of this Policy at any time. Amendments to this Policy shall enter into force upon being disclosed on the Website, thus we recommend that you periodically review the content of the modifications made.