



ANNEX No. 2

to the Privacy Notice for Guests of HOTEL GARDEN Kft. Legitimate Interest Assessment for the Processing of Statistical Data Related to the Use of Services

1. Data Controller

HOTEL GARDEN Vendéglátó és Szolgáltató Korlátolt Felelősségű Társaság

Short Name: HOTEL GARDEN Kft.

Company Registration Number: 20-09-074756

Tax Number: 10804623-2-20

Registered Office: H-8380 Hévíz, Lótuszvirág utca 1., Hungary

E-mail: info@lotustherme.net

Telephone: +36 83 500 500

Website: <https://lotustherme.net/>

(hereinafter referred to as the "Data Controller")

2. Purpose of the Data Processing and Identification of the Legitimate Interest

2.1.

The Data Controller prepares anonymous statistical analyses based on data relating to the use of its services. These analyses enable the Data Controller to maintain up-to-date information regarding which guest groups demonstrate demand for its services. This allows the Data Controller to develop and adapt its services and supplementary services in a manner that better meets guests' expectations and needs.

2.2.

As a result, the Data Controller may positively influence and maintain the effectiveness and profitability of its business operations.

2.3.

The Data Controller's legitimate interest is the maintenance and enhancement of the effectiveness and profitability of its business activities, as accommodation services constitute its primary source of revenue.

2.4.

Accordingly, the Data Controller relies on its legitimate economic interest as the legal basis for the processing of personal data.

3. Necessity of the Data Processing

3.1.

The purposes indicated by guests reflect the reasons for using the services provided by the Data Controller. Information concerning age group, marital status and gender enables the Data Controller to adapt its services and service environment to the generally known needs of specific guest groups (for example, male business travellers typically have different expectations regarding the environment and service delivery than retired couples).

Information concerning nationality also allows the Data Controller to take into account the needs and preferences typically associated with guests of different nationalities in light of changing demand patterns.

Such information is essential for understanding market demand for the Data Controller's services and for making informed decisions regarding service development and marketing strategy.

3.2.

Without collecting such information, the Data Controller would be unable to adapt its services and marketing activities to current demand. This could result in a decline in service quality and demand, thereby significantly jeopardising the successful operation and profitability of the Data Controller.

4. Identification of the Data Subject's Interests and the Impact of the Processing

4.1.

Guests have a legitimate interest in freely exercising their right to informational self-determination and their right to control their personal data, as well as in ensuring that these rights are respected.

4.2.

Processed data:

Guest-related data:

- Gender
- Age group
- Marital status
- Nationality

Data relating to the purpose and nature of the stay:

- Purpose of stay: Business / Leisure
- Type of stay: Group / Family / Individual / Couple / Senior

4.3.

These data are recorded in the Data Controller's administrative IT system and are stored in association with the guest's other data.

4.4.

However, information concerning the purpose of stay and marital status is recorded only in general terms and without specific details; therefore, no additional conclusions may be drawn from such data.

4.5.

The guest's date of birth, from which the age group can easily be derived, is already processed by the Data Controller for the fulfilment of legal obligations arising from tourism tax regulations and the Tourism Act.

4.6.

Similarly, the Data Controller is already required to process data concerning the guest's gender in order to fulfil legal obligations prescribed by the Tourism Act.

4.7.

During the preparation of statistical analyses, the data are permanently separated from the guest's personal data before any further processing takes place. Consequently, the completed statistical analyses can no longer be linked to any individual guest.

For these reasons, and in light of the circumstances described above, the processing does not present any significant risk to guests and does not have any further noticeable impact on them.

5. Safeguards Implemented to Protect the Rights of Data Subjects and Ensure Proportionate Restriction of Rights

5.1.

The processed data do not contain information relating to further specific personal circumstances and are not analysed for the purpose of drawing conclusions regarding the guest's personality traits or personal habits.

5.2.

Before any further use, the data are separated from the guest's other personal data. As a result, the statistical analyses can never subsequently be linked back to the guest.

5.3.

No third party, other than the Data Processor providing the IT system, has access to the data.

5.4.

The Data Controller has contractually obliged the Data Processor, in writing, to ensure an appropriate level of data security and to carry out data processing in compliance with applicable data protection legislation.

5.5.

The Data Controller has informed guests in advance about this processing activity through the Privacy Notice made available to them at check-in.

5.6.

In light of this prior information and considering the purpose and nature of the processing—which is closely connected to the services provided by the Data Controller—guests may reasonably expect such processing to take place.

6. Balancing of Interests

6.1.

The legitimate economic interest pursued by the Data Controller is a fundamental prerequisite for the successful operation of its business. Without information regarding the reasons for using its services and the basic characteristics of its guests, the Data Controller risks being unable to satisfy demand at an appropriate quality level or to target its marketing activities effectively, which could significantly endanger its profitability.

6.2.

The processed data do not allow conclusions to be drawn regarding specific personal characteristics of individual guests. Their use results solely in anonymous statistical analyses from which no conclusions can be drawn regarding any particular guest. Consequently, the processing does not constitute a disproportionate interference with the private lives of guests.

6.3.

Taking into account the safeguards described above, the Data Controller considers the processing of data for statistical analyses relating to the use of its services to be justified, necessary and proportionate for the purpose of pursuing its legitimate economic interests.

22 May 2026

HOTEL GARDEN Kft.