



## **ANNEX No. 3**

### **to the Privacy Notice for Guests of HOTEL GARDEN Kft. Legitimate Interest Assessment for the Processing of Personal Data Related to the Distribution of Guest Satisfaction Survey Questionnaires**

#### **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](mailto: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 sends a survey questionnaire by e-mail to guests following their departure from the accommodation facility in order to obtain feedback regarding guest satisfaction.

##### **2.2.**

The Data Controller has a legitimate interest in maintaining up-to-date information regarding the level of guest satisfaction with its accommodation services and in receiving feedback on various aspects of the services provided.

##### **2.3.**

Based on guests' feedback and evaluations, the Data Controller continuously reviews the quality of its services, thereby ensuring the maintenance of an appropriate service standard and implementing changes where necessary.

##### **2.4.**

This enables the Data Controller to continuously ensure the provision of high-quality services, which is a fundamental prerequisite for the successful operation of its business activities.

##### **2.5.**

Through this process, the Data Controller may positively influence and maintain the effectiveness and profitability of its operations.

##### **2.6.**

The Data Controller's legitimate interest lies in maintaining and improving the effectiveness and profitability of its business activities, as accommodation services constitute its primary source of revenue.

##### **2.7.**

Accordingly, the Data Controller relies on its legitimate interest as the legal basis for this processing activity.

### **3. Necessity of the Data Processing**

#### **3.1.**

Information relating to guest satisfaction is essential for the Data Controller to assess how its services are perceived and evaluated by guests.

#### **3.2.**

Without obtaining such information, the Data Controller would be unable to align the quality of its services with guest expectations, which could lead to a decline in demand.

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

#### **4.1.**

Categories of personal data processed:

Your:

- Surname;
- First name;
- E-mail address.

#### **4.2.**

The data are recorded and stored within the Data Controller's IT systems.

#### **4.3.**

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 such rights are respected.

#### **4.4.**

Guests also have an interest in not receiving unsolicited communications.

#### **4.5.**

The questionnaire is sent to the guest's e-mail address and, in itself, does not constitute a significant intrusion into the guest's private sphere.

#### **4.6.**

Considering both the subject matter of the questionnaire and the timing of its distribution (within 1–14 days following departure from the accommodation facility), such communication cannot reasonably be regarded as entirely unexpected by the guest.

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

#### **5.1.**

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

#### **5.2.**

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

**5.3.**

The Data Controller grants guests an unconditional right to object to this processing activity. If a guest objects, the Data Controller shall cease the processing.

**5.4.**

Completion of the questionnaire is voluntary. Failure to complete the questionnaire or objection to the processing does not result in any adverse consequences for the guest.

**5.5.**

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

**5.6.**

Given such 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 interest pursued by the Data Controller constitutes a fundamental prerequisite for the successful operation of its business. If the Data Controller does not have access to information concerning guest satisfaction, there is a risk that it will be unable to maintain an appropriate quality standard for its services, thereby significantly jeopardising its business performance.

**6.2.**

The processing activity is aimed solely at obtaining information concerning the services provided by the Data Controller and therefore does not constitute an excessive interference with the guest's private life.

**6.3.**

Taking into account the safeguards described above, the Data Controller considers the processing of personal data for the purpose of measuring guest satisfaction to be justified, necessary and proportionate for the pursuit of its legitimate interests.

22 May 2026

HOTEL GARDEN Kft.