



**Privacy Notice  
for Guests of  
Lotus Therme Hotel & Spa \*\*\*\*\***

## **1. Data Controller**

### **HOTEL GARDEN Hospitality and Service Limited Liability Company**

Short name: HOTEL GARDEN Kft.

Company Registration Number: 20-09-074756

Tax Number: 10804623-2-20

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

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. Legal Basis for Data Processing and Scope of this Privacy Notice**

### **2.1.**

The Data Controller's activities related to the processing of personal data are governed primarily by the following legislation:

- **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016** 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 – GDPR);
- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Info Act);
- Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services;
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities;
- Act C of 2000 on Accounting;
- Act CL of 2017 on the Rules of Taxation;
- Act C of 1990 on Local Taxes;
- Act CLVI of 2016 on the State Tasks Related to the Development of Tourist Areas (Tourism Act);
- Government Decree No. 235/2019 (X.15.) on the Implementation of the Act on the State Tasks Related to the Development of Tourist Areas;

- Government Decree No. 239/2009 (X.20.) on the Detailed Conditions for Carrying Out Accommodation Services and the Procedure for Issuing Accommodation Operation Licences;
- Municipal Decree No. 4/2010 (II.10.) of the Municipality of the City of Hévíz on Local Taxes;
- Act XC of 2023 on the General Rules Governing the Entry and Residence of Third-Country Nationals.

## 2.2.

This Privacy Notice applies to data processing activities carried out in connection with accommodation reservations, guest check-in procedures, and the guest's stay at the accommodation.

## 2.3.

For the purposes of this Privacy Notice, the data subject is the guest who uses the accommodation services (hereinafter referred to as the "Guest" or "You").

## 2.4.

Any deadlines and time periods specified in this Privacy Notice shall be calculated based on Hungarian working days.

## 3. Data Processing Related to Accommodation Reservations and Guest Check-in

### 3.1. Categories of Data Subjects

The data subjects concerned by the processing are Guests who make accommodation reservations and/or register for the use of the accommodation services.

### 3.2. Legal Basis for Data Processing

The legal basis for the processing is Article 6(1)(b) of the GDPR, according to which processing is necessary for the performance of a contract to which the data subject is a party. By making a reservation in person, you enter into a contract with the Data Controller for the provision of accommodation services, provided that the reservation is successfully completed. Upon check-in, performance of the contract established on the basis of the reservation commences.

Should you voluntarily provide the Data Controller with special categories of personal data necessary for the provision of the relevant service (e.g. health-related data concerning food allergies or food intolerances, or information relating to special dietary requirements), the legal basis for processing such data, following your explicit consent pursuant to Article 9(2)(a)



of the GDPR, shall also be Article 6(1)(b) of the GDPR, as the processing is necessary for the performance of a contract to which the data subject is a party.

The Data Controller issues an accounting document/invoice regarding the services provided. The legal basis for processing the personal data contained therein is Article 6(1)(c) of the GDPR, namely compliance with the legal obligations imposed on the Data Controller under applicable accounting legislation.

The Data Controller is also subject to legal obligations under legislation governing tourism tax, the Tourism Act, and the Act on the Entry and Residence of Third-Country Nationals, requiring the recording and processing of certain data. In these cases, the legal basis for processing is likewise Article 6(1)(c) of the GDPR, namely compliance with legal obligations applicable to the Data Controller.

The legal basis for processing data relating to the purpose of your stay, your age group, gender, marital status, nationality, and your e-mail address is Article 6(1)(f) of the GDPR, according to which processing is necessary for the purposes of the legitimate interests pursued by the Data Controller. Further information regarding this processing can be found in Chapters 7 and 9.

### **3.3. Categories of Personal Data Processed**

The following personal data are processed on the electronic registration form:

- Surname,
- First name,
- Place and date of birth,
- Nationality,
- Residential address,
- Type of identification document,
- Identification document number,
- Vehicle registration number (if arriving by vehicle),
- Date and time of arrival,
- Date and time of departure,
- E-mail address.

In addition, the following personal data are processed in the administrative system:

- Surname,
- First name,
- Date of birth,
- Place of birth,
- Nationality,
- Residential address,
- Type of identification document,

- Identification document number,
- Vehicle registration number (if arriving by vehicle),
- Telephone number,
- Date and time of arrival,
- Date and time of departure,
- E-mail address,
- VIP classification,
- In the event of border crossing, the date and place of border crossing,
- Check-in registration number.

In the case of advance reservations, the following data are processed in the administrative system and the electronic mail system:

- name, address, telephone number and contact person's name of the customer/company making the reservation, where the reservation is made on your behalf by another person or entity;
- in the case of group reservations, the name and room number of the group leader and/or vehicle driver;
- in the case of group reservations, information on the number of arriving children and/or adults;
- requested room type and room rate;
- arrival and departure dates and the number of nights booked;
- ordered meal services;
- reservation number;
- method of payment;
- e-mail address;
- telephone number.

Furthermore, in the case of advance reservations, the following data are processed exclusively in the administrative system:

- nationality;
- age group classification;
- purpose of stay: business / leisure;
- nature of stay: group / family / individual / couple / senior;
- number of guest nights;
- method of payment;
- number and age of accompanying children (whose personal data are recorded separately with your cooperation and linked to your personal data);
- number of accompanying adults (whose personal data are linked to your personal data if they are accommodated in the same room);
- in the event of exemption from tourism tax, the legal basis for the exemption pursuant to the Local Taxes Act, including:
  - being under 18 years of age;

- receiving inpatient medical treatment in a healthcare institution or care in a social institution located in the municipality where the accommodation is situated;
- having student status at a secondary or higher education institution located in the municipality where the accommodation is situated;
- staying in the municipality as a result of an order issued by an authority or court;
- staying within the framework of vocational training provided by a vocational training institution located in the municipality;
- staying in the municipality for the purpose of fulfilling a public service obligation;
- being an entrepreneur having its registered seat or business establishment in the municipality, or an employee of such entrepreneur or enterprise;
- information supporting the above exemption based on the relevant legal relationship.

In the event of exemption from tourism tax, the following supporting documents may also be processed:

- an employer's certificate issued by the employer;
- a school attendance or student status certificate;
- in the case of inpatient medical treatment or care provided by a social institution, a referral issued in your name or another document issued by the healthcare institution certifying your treatment or care.

Furthermore, pursuant to the Tourism Act, the following data are processed in the administrative system:

- family name and given name;
- birth family name and given name;
- place and date of birth;
- gender;
- nationality;
- mother's birth family name and given name;
- identification data of the personal identification document and/or travel document;
- in the case of third-country nationals, the visa or residence permit number, and the date and place of entry into Hungary.

In addition, data relating to any special requirements may be processed in the administrative system, particularly concerning dietary habits and dietary restrictions (e.g. food allergies or food intolerances).

Furthermore, data generated during your stay at the accommodation are processed. The following data may be recorded in the administrative system and on accounting documents:



- additional services used during the stay and charged to the accommodation account;
- records of consumption and purchases made at the accommodation.

### **Source of the Data**

During the reservation and check-in process, you provide the above personal data directly to the Data Controller.

Where a reservation is made through a partner of the Data Controller (such as accommodation booking intermediaries or tour operators), the relevant partner transfers your personal data to the accommodation provider. Further information regarding such data transfers can be obtained directly from the partner through whom you made your reservation.

Part of the data relating to additional services used and consumption during your stay is generated directly by the Data Controller. Other data, particularly data relating to intermediary services, are generated by subcontractors involved in the provision of the Data Controller's services. Such data are received from the relevant subcontractor for the purposes of charging them to the accommodation account and/or settling accounts with the subcontractor.

For information regarding any further processing of personal data carried out by the relevant subcontractor, please contact the subcontractor directly.

### **3.4. Purpose of the Data Processing**

The purpose of the data processing is the provision of accommodation services by the Data Controller. (Information regarding the statutory data provision obligations related to the check-in process can be found in the following chapter.)

The purpose of processing your identification data is to identify you, which is necessary for the provision of the accommodation service.

Your name and address are also included on the invoice issued for the services provided, for the purpose of complying with the obligations prescribed by accounting legislation.

For the purpose of fulfilling its legal obligations relating to tourism tax, the Data Controller records your identification data, data relating to your stay, and, where applicable, data substantiating entitlement to a tourism tax exemption. The Municipal Clerk of the City of Hévíz is entitled to inspect the tourism tax records maintained by the accommodation provider at any time in the course of an official audit:

#### **Authority Department of the Municipality of the City of Hévíz**

Address: H-8380 Hévíz, Kossuth Lajos u. 1.

Postal Address: H-8381 Hévíz, P.O. Box 120



E-mail: [heviz@t-online.hu](mailto:heviz@t-online.hu)  
Telephone: +36 83 500 800

The Data Controller records a broader range of your identification data in its administrative system than those contained in the electronic registration form, for the purpose of complying with the legal obligations prescribed by the Tourism Act. Further information regarding this processing is provided in the following chapter.

Data relating to the purpose of your stay, your age group, gender, marital status, and nationality are processed for the purpose of improving the Data Controller's services and aligning them with customer demand. Further information is provided in Chapter 7.

Your e-mail address is processed for the purpose of measuring guest satisfaction, as described in detail in Chapters 9 and 10, and for conducting communication necessary for the performance of the accommodation service. Your e-mail address will only be used for marketing purposes on the basis of your separate and explicit consent (see Chapters 16 and 17).

Your telephone number is required so that the Data Controller may contact you if necessary during your stay at the accommodation.

Your vehicle registration number is processed for the purpose of providing parking facilities and managing vehicle entry to and exit from the premises.

Any information you provide regarding special dietary requirements is processed in order to ensure that meals appropriate to your needs can be provided. The association of dietary information with your name and room number is necessary for charging additional consumption to your room account and for monitoring the use of meal services included in the accommodation package, as well as preventing misuse in connection therewith.

The purpose of processing data relating to additional services used and consumption incurred during your stay is to include such items on the accommodation invoice for subsequent consolidated billing.

### **3.5. Retention Period of the Data Processing**

The mandatory retention period for personal data processed on accounting documents (name and address, services used, and consumption data) is eight (8) years from the date of issuance of the document, in accordance with the Accounting Act. Upon expiry of this retention period, the Data Controller shall delete the data.

Tax-related records include the electronic guest register containing the following data specified in Section 3.3:

- identification data;

- data relating to the duration of the stay and services used during the stay;
- data relating to tourism tax.

In accordance with the Act on the Rules of Taxation, these data are retained until the expiration of the limitation period for tax assessment, which generally results in a retention period of six (6) years from the issuance of the relevant document.

Any additional data processed in connection with the provision of accommodation services shall be deleted by the Data Controller after the expiry of five (5) years from the date of departure from the accommodation, corresponding to the general limitation period applicable to civil law claims.

### **3.6. Method of Data Storage**

The data are stored electronically within the Data Controller's information technology systems in a separate database (electronic guest register). In the case of advance reservations made remotely, data are also stored in the administrative system, electronic mail system, and on accounting documents (advance invoices and final invoices).

### **3.7. Consequences of Failure to Provide Data**

The processing of the above data (except for data relating to special requirements and data generated during your stay) is necessary for the performance of the accommodation services agreement.

Where you use the accommodation services, the Data Controller is legally obliged to record the data required for tourism tax administration, immigration-related registration obligations, and the data reporting obligations prescribed by the Tourism Act.

If you fail to provide the required data, you will not be able to use the accommodation services.

If you provide the data necessary for entering into the contract and for the Data Controller's compliance with its legal obligations, but do not provide information relating to your special requirements, the accommodation provider (the Data Controller) will be unable to take such requirements into account when providing the accommodation services.

## **4. Data Reporting Related to the Registration of Guests Using Accommodation Services**

### **4.1.**

Pursuant to the provisions of Act CLVI of 2016 on the State Tasks Related to the Development of Tourist Areas (hereinafter referred to as the "Tourism Act"), Government Decree No. 235/2019 (X.15.) implementing the Tourism Act (hereinafter referred to as the "Implementing Decree"), and Act XC of 2023 on the General Rules Governing the Entry and

Residence of Third-Country Nationals (hereinafter referred to as the “Third-Country Nationals Act”), the Data Controller is subject to a statutory data reporting obligation as set out below.

#### **4.2.**

The data subjects concerned by the processing are Guests using the accommodation services.

#### **4.3.**

The legal basis for the processing is Article 6(1)(c) of the GDPR, according to which processing is necessary for compliance with a legal obligation to which the Data Controller is subject.

### **4.4. Categories of Personal Data Processed**

#### 4.4.1. Guest Identification Data

The following personal data are processed:

- family name and given name;
- family name and given name at birth;
- place and date of birth;
- gender;
- nationality;
- mother's family name and given name at birth;
- identification details of the personal identification document and/or travel document;
- in the case of third-country nationals, the visa or residence permit number, as well as the date and place of entry.

#### 4.4.2. Accommodation Service Data

- address of the accommodation establishment;
- commencement date and time of the accommodation service;
- expected date and time of departure;
- actual date and time of departure.

Any data not contained in the identification document presented by the Guest are not required to be recorded.

### **4.5. Purpose of the Data Processing**

The purpose of the processing is the fulfilment of the legal obligations set out in Sections 9/H (1)–(3) of the Tourism Act. Pursuant to these provisions, accommodation providers are required, for the protection of the rights, safety and property of the data subject and others,

and for the purpose of monitoring compliance with regulations governing the stay of third-country nationals and persons enjoying the right of free movement and residence, to record and store the above data at check-in through accommodation management software on the storage platform designated by Government Decree and provided by Visit Hungary Nonprofit Ltd. (the Closed Guest Information Database, hereinafter referred to as "VIZA").

With regard to third-country nationals, Section 147 of the Third-Country Nationals Act also imposes this obligation and further requires that the data be reported to the immigration authority.

The statutory purpose of the data reporting obligation is to ensure the protection of your rights, safety and property, as well as those of others, and to facilitate the monitoring of compliance with regulations governing the stay of third-country nationals and persons exercising the right of free movement and residence. In particular, the objective is to promote public order, public safety, the protection of state borders, and the protection of the rights, safety and property of you and others.

#### **4.6. Retention Period**

Pursuant to Section 9/H (3) of the Tourism Act, the Data Controller processes the Guest data specified in Section 4.4.1 until the last day of the first calendar year following the date on which the data came to its knowledge.

The Data Controller processes the data until fulfilment of its obligation to transfer the data to Visit Hungary Nonprofit Ltd., the designated storage provider. The data transfer must be completed simultaneously with the recording of the data at check-in.

Visit Hungary Nonprofit Ltd. processes the Guest data until the last day of the first calendar year following the recording of the data.

#### **4.7. Method of Recording, Storage and Data Security**

##### Recording of Data

The Data Controller records the data specified in Section 4.4.1 through a document scanner integrated into the accommodation management software. Data that cannot be recorded using the document scanner, as well as the data specified in Section 4.4.2, are entered manually into the accommodation management software.

Images of scanned identification documents are not stored. The system used is not permitted to process or retain copies of the scanned documents.



## Storage of Data

The data are stored electronically in encrypted databases on the storage platform provided by Visit Hungary Nonprofit Ltd.

## Data Security

The recording, transmission to the central storage platform, and storage of data are carried out within an information technology system protected by multiple layers of asymmetric encryption. All personal data listed above are stored in encrypted form.

### **4.8. Persons and Authorities Entitled to Access the Data**

Pursuant to Section 9/H (4) of the Tourism Act, the data may only be accessed by the accommodation provider (the Data Controller) and persons or authorities expressly authorised by law (e.g. competent authorities).

Furthermore, pursuant to Section 9/H (5) of the Tourism Act, authorities acting within their statutory powers may perform electronic queries in the VIZA database for the limited purpose of identifying the accommodation provider at which a specific individual is registered as a guest. Access to detailed information relating to the guest or the accommodation service may only be obtained through a direct request to the accommodation provider.

Authorities and organisations entitled to access the data include:

- Hungarian Tourism Agency Ltd. (Magyar Turisztikai Ügynökség Zrt.);
- local municipalities;
- the National Tax and Customs Administration;
- the Hungarian Central Statistical Office;
- the Police;
- Visit Hungary Nonprofit Ltd.

With regard to third-country nationals, Section 147 of the Third-Country Nationals Act additionally requires the reporting of data to the immigration authority.

### **4.9. Use of a Data Processor**

Pursuant to the above legislation, the Data Controller uses Visit Hungary Nonprofit Ltd., the provider of the central storage platform, as a data processor.

The storage provider is not entitled to access or view the personal data stored on the platform.

Further information regarding data processing arrangements is provided in Section 18.3.

#### **4.10. Mandatory Nature of Data Provision and Consequences of Failure to Provide Data**

Pursuant to Section 9/H (2) of the Tourism Act, Guests are required, at the time of check-in, to present a valid personal identification document or travel document for the purpose of recording the above data.

In accordance with the above legal provision, the Data Controller is required to refuse the provision of accommodation services if the Guest fails to present the required document.

#### **5. Payment by Bank Card or SZÉP Card at the Accommodation**

##### **5.1.**

Where payment is made by bank card or SZÉP Card, the transaction is carried out through the POS terminal installed at the accommodation.

##### **5.2.**

In such cases, you provide your bank card or SZÉP Card payment details directly to the financial institution or payment service provider operating the POS terminal. The Data Controller does not have access to, nor does it process, these payment details.

##### **5.3.**

The data controller of the payment data is the POS terminal service provider, acting as an independent data controller.

##### **5.4.**

The operator of the POS terminals installed at the accommodation is:

#### **Worldline Financial Services (Europe) S.A.**

Company Registration Number: 8230609000

Registered Office: Gospodinjska ulica 8, 1000 Ljubljana, Slovenia

Branch Office: H-1034 Budapest, Tímár utca 20.

Postal Address: H-1034 Budapest, Tímár utca 20.

Telephone: +36 1 480 1123

Contact: <https://worldline.com/hu-hu/home/main-navigation/git/general-contact>

Website: <https://worldline.com/>

## **5.5.**

The Data Controller does not transfer any personal data relating to you to the above service provider in connection with the payment transaction, nor does the service provider transfer any personal data to the Data Controller.

## **5.6.**

The Data Controller retains one copy of the payment receipt printed by the POS terminal. However, the receipt only contains the last four digits of the bank card or SZÉP Card used for the payment. These data alone are insufficient to identify either the payment card or its holder.

The receipt constitutes an accounting document. Accordingly, the Data Controller is legally obliged under the Accounting Act to retain it for a period of eight (8) years. The legal basis for this processing is Article 6(1)(c) of the GDPR, namely compliance with a legal obligation to which the Data Controller is subject.

## **6. Processing of Children's Personal Data**

### **6.1.**

The Data Controller collects personal data relating to children under the age of 16 only with the involvement of an adult exercising parental responsibility over the child.

### **6.2.**

Although this is not expressly required by law in connection with the provision of accommodation services, the Data Controller considers the consent of a child under the age of 16 to be valid in the case of consent-based processing activities only where such consent is authorised by an adult exercising parental responsibility over the child. Alternatively, the Data Controller processes such data on this legal basis where the consent has been provided directly by the person exercising parental responsibility.

## **7. Collection of Statistical Data Relating to the Use of Services**

### **7.1.**

The data subjects concerned by the processing are Guests using the accommodation services.

### **7.2.**

The legal basis for the processing is Article 6(1)(f) of the GDPR, according to which processing is necessary for the purposes of the legitimate interests pursued by the Data Controller.



The Data Controller has a legitimate interest in maintaining up-to-date information regarding the categories of guests using its services and the purposes for which such services are used, thereby enabling the continuous adaptation of its services to market demand. This contributes to maintaining and improving the effectiveness and profitability of its operations.

A separate legitimate interest assessment has been prepared. Information regarding its availability may be obtained from the Data Controller.

### **7.3. Categories of Personal Data Processed**

The following personal data are processed:

- gender;
- age group;
- marital status;
- nationality.

In addition, the following information relating to the guest's stay is processed:

- purpose of stay: business / leisure;
- nature of stay: group / family / individual / couple / senior.

The data are recorded within the Data Controller's administrative information system and may be stored in association with other data provided by you during the check-in process.

### **7.4. Purpose of the Data Processing**

The Data Controller uses the collected data to prepare anonymous statistical analyses. These statistics enable the Data Controller to maintain up-to-date information regarding which categories of Guests, based on the criteria listed above, demonstrate demand for its services.

This allows the Data Controller to further develop and tailor its services and ancillary services to better meet the expectations and preferences of Guests. Consequently, the Data Controller may improve the efficiency and effectiveness of its business operations.

### **7.5. Retention Period**

The Data Controller shall delete the personal data five (5) years after the Guest's departure from the accommodation. This retention period corresponds to the general limitation period applicable to civil law claims.

Anonymous statistical data are retained without limitation. However, as the data contained therein can no longer be used to identify you, such statistics no longer constitute personal data and are not treated as such by the Data Controller.

## **7.6. Method of Storage**

The data are stored in a separate database within the Data Controller's information technology system.

## **8. Data Processing Related to Electronic Room Key Cards**

### **8.1.**

The data subjects concerned by the processing are Guests using the accommodation services.

### **8.2.**

The legal basis for the processing is Article 6(1)(b) of the GDPR, according to which processing is necessary for the performance of a contract to which the data subject is a party.

### **8.3. Categories of Personal Data Processed**

- the electronic identifier of the electronic room key card;
- the room number assigned to the card;
- the start and end dates of the stay;
- the timestamps of door openings performed using the electronic room key card.

Based on the room number, it is possible to identify the user of a particular card by reference to the check-in data stored by the accommodation provider; however, these data are not directly linked.

### **8.4. Purpose of the Data Processing**

The purpose of the processing is the performance of the accommodation services agreement.

The Data Controller operates an electronic card system for controlling room door locks.

The Data Controller does not use or analyse the room key card usage data. The electronic door access system is operated solely for the purpose of providing a convenience service to Guests.

### **8.5. Retention Period**

The room key card usage records may be stored for a maximum of 1,500 door-opening events. Accordingly, only the most recent 1,500 door-opening records are available at any given time.



The association between the electronic card identifier and a specific room ceases once you leave the accommodation or move to another room.

## **8.6. Method of Storage**

The card identifier is stored on the electronic room key card itself.

The card identifier is assigned to a room number within the electronic access control system. This association remains in place until the card is returned by the Guest.

The room key card usage records (door-opening events) are stored locally in the memory unit of the electronic door lock. However, the data stored therein are not, by themselves, sufficient to identify a Guest. Furthermore, such data can only be retrieved locally through a direct connection to the door lock and cannot be accessed remotely.

## **9. Distribution of Guest Satisfaction Questionnaires**

### **9.1.**

The Data Controller sends a guest satisfaction questionnaire by e-mail to Guests after their departure from the accommodation.

### **9.2.**

The data subjects concerned by the processing are Guests who have used the accommodation services.

### **9.3.**

The legal basis for the processing is Article 6(1)(f) of the GDPR, according to which processing is necessary for the purposes of the legitimate interests pursued by the Data Controller.

The Data Controller has a legitimate interest in maintaining up-to-date information regarding the level of Guest satisfaction with the accommodation services and in receiving feedback concerning the quality of its services from various perspectives. This enables the Data Controller to continuously maintain and improve service quality, which is a fundamental condition for the successful operation of its business.

A separate legitimate interest assessment has been prepared. Information regarding its availability may be obtained from the Data Controller.

### **9.4. Categories of Personal Data Processed**

- surname;
- first name;



- e-mail address.

## **9.5. Purpose of the Data Processing**

The purpose of the processing is to contact Guests who have used the services of the Data Controller by e-mail and to provide them with access to an electronic questionnaire (via a link), thereby enabling the monitoring and improvement of service quality.

## **9.6. Retention Period**

The processing of personal data continues until the electronic questionnaire has been sent.

## **9.7. Method of Storage**

The data are stored electronically in a separate database within the Data Controller's information technology system.

## **10. Data Processing Related to the Completion of Questionnaires**

### **10.1.**

Guests have the opportunity to evaluate their satisfaction with the Data Controller's services by completing an electronic questionnaire sent by e-mail following their departure, by completing paper-based questionnaires available in the hotel rooms, or through the Data Controller's website (<https://lotustherme.net/>).

### **10.2.**

The data subjects concerned by the processing are Guests providing evaluations of the services offered by the Data Controller.

### **10.3.**

The legal basis for the processing is your consent pursuant to Article 6(1)(a) of the GDPR.

You provide your consent by completing the questionnaire and, where applicable, by selecting the relevant consent declaration.

You are entitled to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing carried out prior to such withdrawal.

If you withdraw your consent, the Data Controller shall delete the personal data provided in the questionnaire.

## **10.4. Categories of Personal Data Processed**



In the case of electronic questionnaires sent by e-mail and paper-based questionnaires available in hotel rooms:

Your:

- surname;
- first name;
- e-mail address;
- nationality;
- telephone number;
- room number.

Your ratings on a scale from 1 to 10 relating to:

- the quality, cleanliness and standard of individual hotel departments and services;
- overall guest experience and general impression;
- likelihood of returning and recommending the hotel.

In the case of evaluations submitted through the publicly accessible questionnaire on the Data Controller's website:

Your:

- name;
- e-mail address;
- response regarding whether you would recommend the hotel (selected from a drop-down list: Yes / Maybe / No);
- comments (optional).

In addition, ratings on a scale from 1 to 5 in the following categories:

- room;
- staff;
- restaurant;
- cleanliness;
- medical services;
- wellness facilities;
- hotel atmosphere;

as well as the overall average rating.

Where, in the Data Controller's assessment, your responses provided in the questionnaire require further action, your e-mail address and telephone number may be processed for the purpose of enabling contact in connection with the handling of the matter.

## **10.5. Purpose of the Data Processing**

Based on your feedback and evaluations, the Data Controller continuously reviews the quality of its services in order to maintain an appropriate standard of service and, where necessary, introduce improvements and corrective measures.

## **10.6. Retention Period**

The Data Controller reviews data relating to your opinion of the accommodation services within 30 days following your departure from the accommodation. If, based on the evaluation, no further action towards the Guest is required, the data shall be deleted or anonymised.

The Data Controller prepares anonymous statistical analyses based on the evaluations and retains such statistics without time limitation. However, the data contained therein can no longer be used to identify you, and therefore the statistics no longer contain personal data relating to you.

## **10.7. Method of Storage**

The data are stored electronically in a separate database within the Data Controller's information technology system.

In the case of paper-based questionnaires available in hotel rooms, the data provided on the questionnaire are retained in paper form until processing has been completed.

## **11. Data Processing Related to Reservations Made by Telephone**

### **11.1.**

The data subjects concerned by the processing are Guests making accommodation reservations by telephone.

### **11.2.**

The legal basis for the processing is Article 6(1)(b) of the GDPR, according to which processing is necessary for the performance of a contract to which the data subject is a party.

### **11.3. Categories of Personal Data Processed**

Your:

- surname;
- first name;
- address;

- telephone number;
- e-mail address;
- planned date of arrival;
- planned date of departure;
- number of nights booked;
- selected room(s), including room type and occupancy capacity;
- number of adults included in the stay;
- number and age of children included in the stay;
- requested meal plan (breakfast, half board, full board);
- reservation number;
- vehicle registration number, if arriving by vehicle;
- any additional services requested;
- price of the service, currency of payment and payment method;
- name, address, telephone number and contact person of the customer/company placing the reservation, where the reservation is made by another person or entity;
- ordered meal services.

Of any special categories of personal data communicated in connection with special requirements, only those data necessary for the provision of the requested service are recorded. Such data are processed for the purposes and under the conditions described in Chapter 3.

Telephone conversations are not recorded.

#### **11.4. Purpose of the Data Processing**

The purpose of the processing is the performance of the accommodation services agreement, the provision of services in accordance with the requirements specified during the reservation process, and the maintenance of the communication necessary for that purpose.

#### **11.5. Retention Period**

The Data Controller shall delete data processed in connection with the reservation five (5) years after the reservation was made or, where the accommodation service is used, five (5) years after departure from the accommodation. This period corresponds to the general limitation period applicable to civil law claims.

Where the reservation results in the conclusion of a contract for accommodation services, the processing and retention period of the data shall additionally be governed by the provisions set out in Chapter 3.

#### **11.6. Method of Storage**

Data collected by telephone are stored by the Data Controller in its electronic mail system with regard to the content of confirmation e-mails and in a separate database within its administrative information technology system.

## **12. Data Processing Related to Reservations Made Through the Data Controller's Website**

The Data Controller has prepared a separate Privacy Notice regarding the use of the online booking platform provided by the Data Controller. This Privacy Notice is available on the website <https://lotustherme.net/>.

## **13. Data Processing Related to the Loyal Guest Register**

### **13.1.**

The data subjects concerned by the processing are those Guests using the hotel services who consent to their inclusion in the Loyal Guest Register.

### **13.2.**

The legal basis for the processing is your consent pursuant to Article 6(1)(a) of the GDPR, which you may withdraw at any time.

### **13.3. Categories of Personal Data Processed**

Your:

- surname;
- first name;
- e-mail address;
- purpose of stay (business, leisure, etc.);
- nationality.

In addition, data generated during your stay at the hotel:

- any additional services used;
- data relating to hotel consumption and purchases;
- room number used during the stay.

Within the Loyal Guest Register, the data of individual persons are not linked together. Accordingly, the data of persons accompanying you will not be associated with your personal data.

### **13.4. Purpose of the Data Processing**

The storage of information necessary to provide services in accordance with your comfort and expectations enables the Data Controller to offer you a more attentive welcome and a personalised service during future visits, without requiring you to repeatedly communicate your personal preferences and requirements.

### **13.5. Retention Period**

The Data Controller stores your data in the Loyal Guest Register primarily until you withdraw your consent.

However, if you do not use the hotel services of the Data Controller for a period exceeding five (5) years, your data will be deleted from the Loyal Guest Register even if you have not withdrawn your consent.

### **13.6. Method of Storage**

The data are stored electronically in a separate database within the Data Controller's information technology system.

## **14. Data Processing Related to Reservations Made Through Accommodation Intermediaries**

### **14.1. Joint Controllership**

The Data Controller's Partners are business entities operating online accommodation booking platforms and travel agencies. In cases where a Partner's service is specifically aimed at facilitating reservations for services provided by the Data Controller, the Data Controller and the relevant Partner act as joint controllers in relation to the processing of personal data.

The Data Controller's regular Partners include, in particular:

- Booking.com B.V. – <https://www.booking.com/>
- Agoda Company Pte. Ltd. – <https://www.agoda.com/>
- CzechTravelAgency s.r.o. (Lazne Travel) – <https://www.laznetravel.cz/>
- Slevomat.cz, s.r.o. – <https://www.slevomat.cz/>
- TPF group s.r.o. – <https://travelking.hu/>
- Expedia, Inc. – <https://www.expedia.com/>
- Super Urlaub GmbH – <https://www.kurzurlaub.de/>
- Szallas Group Zrt. – <https://szallas.hu/>, <https://www.maiutazas.hu/>, <https://www.szallasguru.hu/>
- Hotelstart Kft. – <https://www.szallasvadasz.hu/>
- eDreams International Network, S.L. – <https://www.edreamsodigeo.com/>



Detailed information and contact details relating to the above Partners are provided in Appendix 1.

Information regarding any data processing activities carried out independently by the Partners, outside the scope of the joint controllership described herein, is available on the respective websites of the Partners.

Whenever you use a Partner's services, you submit your reservation through the Partner's website, application, representative, or other booking channel. Accordingly, you may identify the specific Partner participating in the joint processing activity in each case.

The joint controllership applies exclusively to the data processing activities relating to reservations and their mediation as described herein.

#### **14.2. Categories of Data Subjects**

The data subjects concerned by the processing are Guests making accommodation reservations through one of the Data Controller's accommodation intermediary Partners. Reservations may be made via an online platform, in person through the Partner, or by any other method provided by the Partner.

#### **14.3. Legal Basis for the Processing**

The legal basis for the processing is Article 6(1)(b) of the GDPR, according to which processing is necessary for the performance of a contract to which the data subject is a party.

#### **14.4. Categories of Personal Data Processed**

The scope of data processed may vary depending on the Partner through which the reservation is made. The following represents the broadest possible scope of data that may be processed:

Your:

- surname;
- first name;
- address;
- telephone number;
- e-mail address;
- planned date of arrival;
- planned date of departure;
- selected room(s), including room type and occupancy capacity;
- number of adults included in the stay;
- number and age of children included in the stay;
- requested meal plan (breakfast, half board, full board);

- order number;
- any additional services requested;
- price of the service.

Of any special categories of personal data communicated in connection with special requirements, only those data necessary for the provision of the requested services are recorded. Such data are processed for the purposes and under the conditions described in Chapter 3.

#### **14.5. Source of the Data**

The Data Controller receives the above personal data from the Partner through whom you made the reservation. The Partner transfers to the Data Controller the personal data that you provided to the Partner during the reservation process.

#### **14.6. Purpose of the Processing**

On the part of the Data Controller, the purpose of the processing is the performance of the accommodation services agreement and the provision of services corresponding to the requirements specified during the reservation process.

On the part of the Partner, the purpose of the processing is the mediation of the accommodation service and facilitating the conclusion of the agreement between you and the Data Controller.

#### **14.7. Retention Period**

The Data Controller shall delete personal data processed in connection with the reservation five (5) years after the reservation was made or, where the accommodation service is used, five (5) years after departure from the accommodation. This period corresponds to the general limitation period applicable to civil law claims.

Where the reservation results in the conclusion of an accommodation services agreement, the processing and retention period of the data shall additionally be governed by the provisions set out in Chapter 3.

#### **14.8. Method of Storage**

The data are stored electronically in a separate database within the Data Controller's information technology system.

## **15. Data Processing Related to Transfer Services**

### **15.1.**

The data subjects concerned by the processing are Guests of the Data Controller who make use of the transfer service.

### **15.2.**

The legal basis for the processing is Article 6(1)(b) of the GDPR, according to which processing is necessary for the performance of a contract to which the data subject is a party.

### **15.3. Categories of Personal Data Processed**

Your:

- name;
- address;
- telephone number;
- e-mail address.

### **15.4. Purpose of the Data Processing**

The purpose of the processing is the organisation and provision of the transfer service requested by the Guest.

### **15.5. Retention Period**

The Data Controller processes personal data relating to the transfer service on the basis of its legitimate economic interest until the expiration of the limitation period applicable to claims arising from the contractual relationship. In general, this period is five (5) years from the date on which the claim becomes due.

Any interruption of the limitation period shall extend the duration of the processing until the new limitation period expires.

The Data Controller also processes accounting documents issued in connection with the transfer service for the period necessary to comply with the document retention obligations prescribed by accounting legislation. Pursuant to the Accounting Act, this period is at least eight (8) years from the date of issuance of the relevant document. Following the expiry of this retention period, the Data Controller shall delete the data within one year.

This category primarily includes data appearing on invoices, such as the name and address of the customer ordering the service, together with information relating to the ordered service and its payment.

## **15.6. Method of Storage**

The data are stored electronically.

## **16. Data Processing Related to Newsletter Distribution**

### **16.1.**

The data subject concerned by the processing is the Guest who consents to receiving newsletters by means of the relevant declaration.

### **16.2.**

The legal basis for the processing is your consent pursuant to Article 6(1)(a) of the GDPR, taking into account Sections 6(1) and 6(2) of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.

You are entitled to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing carried out prior to such withdrawal.

In addition to providing useful information, the newsletter also serves the purpose of direct marketing by the Data Controller.

Subscription to the newsletter is independent of the use of any other service. Subscription is voluntary and based on your informed decision.

Failure to subscribe to the newsletter shall not result in any disadvantage regarding the use of the website or any other services provided by the Data Controller.

The Data Controller does not make newsletter subscription a condition for using any of its other services.

### **16.3. Categories of Personal Data Processed**

Your:

- name;
- e-mail address.

### **16.4. Purpose of the Data Processing**

The purpose of the processing is the distribution of newsletters by the Data Controller via e-mail.

In addition to providing useful information, the newsletter service is intended to facilitate direct marketing activities by the Data Controller.

Newsletters may contain information relating to the Data Controller's services, new developments, current offers, promotional communications and advertisements.

### **16.5. Retention Period**

The processing continues until you withdraw your consent (unsubscribe from the newsletter) or request the deletion of your personal data.

### **16.6. Method of Storage**

The data are stored electronically in a separate database within the Data Controller's information technology system.

## **17. Data Processing Related to the Personalisation of Newsletter Content**

### **17.1.**

The data subjects concerned by the processing are Guests who, in addition to subscribing to the newsletter, have also consented to the personalisation of newsletter content.

### **17.2.**

The legal basis for the processing is your consent pursuant to Article 6(1)(a) of the GDPR.

You are entitled to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing carried out prior to such withdrawal.

### **17.3. Categories of Personal Data Processed**

Your:

- nationality;
- any additional services used;
- data relating to hotel consumption and purchases.

### **17.4. Purpose of the Data Processing**

The purpose of processing data used for personalisation is to enable the Data Controller to send offers that are relevant to your interests and preferences, while at the same time avoiding the delivery of offers that are unlikely to be of interest to you.

### **17.5. Retention Period**



The processing continues until you object to the personalisation of newsletters or withdraw your consent to receive newsletters (unsubscribe).

## **17.6. Method of Storage**

The data are stored electronically in a separate database within the Data Controller's information technology system.

## **18. Recipients (Data Processors)**

The Data Controller engages the following business entities as data processors.

### **18.1. Developer of the Property Management Software Used by the Accommodation Provider**

#### 18.1.1.

The data subjects concerned by the processing are Guests using the accommodation services.

#### 18.1.2.

The Data Controller engages as a data processor the developer of the property management and maintenance reporting software used in connection with the provision of accommodation services:

### **MT-HostWare Számítástechnikai Korlátolt Felelősségű Társaság**

Short name: HostWare Kft.

Company registration number: 01-09-263594

Tax number: 10426917-2-42

Registered office: 1149 Budapest, Róna utca 120–122, Hungary

Postal address: 1149 Budapest, Róna utca 120–122, Hungary

Telephone: +36 1 469 9000

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

Website: <http://hostware.hu/>

(hereinafter referred to as the "Data Processor").

#### 18.1.3.

The scope of the processing covers all personal data processed by the Data Controller as described in this Privacy Notice.

#### 18.1.4.

The purpose of engaging the Data Processor is to ensure the proper operation, continuous availability and technical maintenance of the property management software, as well as the prompt resolution of technical issues and system errors.

#### 18.1.5.

The processing is carried out electronically. The processing operations are limited exclusively to those necessary for the provision of information technology services required to ensure and improve the proper functioning of the property management software.

The Data Processor does not process the data for its own purposes.

### **18.2. Developer of the Software Used for Connecting Online Booking Platforms with the Accommodation Management System, Recording Telephone Reservations and Analysing Reservation Data**

#### 18.2.1.

The data subjects concerned by the processing are Guests making reservations through online booking platforms or by telephone.

#### 18.2.2.

The Data Controller engages as a data processor the developer of the software used to connect reservation systems:

#### **D-EDGE SAS**

Company registration number: PARIS 431 513 852

Registered office: 14/16, boulevard Poissonnière, 75009 Paris, France

Postal address: 14/16, boulevard Poissonnière, 75009 Paris, France

Telephone: +33 1 44 71 05 05

Contact page: <https://www.d-edge.com/contact/>

Website: <https://www.d-edge.com/>

(hereinafter referred to as the "Data Processor").

#### 18.2.3.

The scope of the processing covers the personal data provided by you during the reservation process.



18.2.4.

The purpose of engaging the Data Processor is to ensure the continuous availability of the software.

18.2.5.

The processing is carried out electronically. The processing operations are limited exclusively to those necessary for the provision of information technology services required to ensure and improve the proper functioning of the software.

The Data Processor does not process the data for its own purposes.

### **18.3. Provider of the Statutory Electronic Storage Service for Data Reporting Related to Guest Registration**

18.3.1.

The data subjects concerned by the processing are Guests using the accommodation services.

18.3.2.

Pursuant to the provisions of the Tourism Act and its implementing regulation, the Data Controller engages as a data processor the provider of the electronic storage facility designated for statutory guest registration data reporting:

#### **Visit Hungary Nemzeti Turisztikai Szervezet Nonprofit Zártkörűen Működő Részvénytársaság**

Short name: Visit Hungary Nonprofit Zrt.

Company registration number: 01-10-049807

Tax number: 26338783-4-43

Registered office: 1123 Budapest, Alkotás u. 19, Hungary

Postal address: 1525 Budapest, P.O. Box 97, Hungary

Telephone: +36 1 488 8700

E-mail: [info@visithungary.com](mailto:info@visithungary.com)

Website: <https://visithungary.com/>

(hereinafter referred to as the "Data Processor").

### 18.3.3.

The processing covers the following personal data:

- your family name and given name, birth family name and given name, place and date of birth, gender, nationality, and your mother's birth family name and given name;
- identification data contained in your identity document or travel document; in the case of third-country nationals, the visa or residence permit number, as well as the date and place of entry into the country;
- the address of the accommodation establishment and the commencement date, expected end date and actual end date of the accommodation service.

### 18.3.4.

The purpose of engaging the Data Processor is to comply with the obligation set out in Section 9/H (1) and (3) of the Tourism Act, pursuant to which data relating to guest registration must be recorded and stored on the electronic storage platform designated by the implementing regulation.

### 18.3.5.

The processing is carried out electronically. Pursuant to Section 9/H (4) of the Tourism Act, the activities of the storage service provider, acting as a data processor on behalf of the accommodation provider, are limited exclusively to storing the data in encrypted form using the encryption method designated by Government Decree and ensuring access to the data for the accommodation provider and for persons or authorities authorised by law through the accommodation provider.

The storage service provider is not entitled to access or become acquainted with the content of the data stored on the platform.

## **18.4. System Administrator**

### 18.4.1.

The data subjects concerned by the processing are the Guests referred to in this Privacy Notice.



18.4.2.

The Data Controller engages the following company as a data processor:

**EOX Fejlesztő és Szolgáltató Korlátolt Felelősségű Társaság**

Short name: EOX Kft.

Company registration number: 01-09-861785

Tax number: 13562582-2-42

Registered office: 1146 Budapest, Francia utca 57., Building A, Door 1, Hungary

Postal address: 1146 Budapest, Francia utca 57., Building A, Door 1, Hungary

E-mail: [info@eox.hu](mailto:info@eox.hu)

Website: <https://www.eox.hu/>

acting as the system administrator of the Data Controller's information technology system (hereinafter referred to as the "Data Processor").

18.4.3.

The purpose of engaging the Data Processor is the maintenance of the Data Controller's information technology system and ensuring its continuous operability.

18.4.4.

In the course of performing its duties, the Data Processor may, where necessary, gain access to the personal data listed in this Privacy Notice, although such access may not necessarily occur.

The purpose of the Data Processor's involvement is not the use of personal data; any data processing operations performed are required solely for technical reasons.

18.4.5.

The processing is carried out electronically.

Apart from the technical operations necessary to perform the above tasks, the Data Processor does not carry out any further processing activities and does not make the data accessible to third parties.

The processing operations are limited exclusively to information technology activities necessary for maintenance and repair work, as well as participation in data backup and data copying procedures and the provision of technical assistance upon the instructions of the Data Controller.



## **18.5. Data Processing Related to Newsletter Distribution**

### 18.5.1.

The data subjects concerned by the processing are those individuals who have consented to receiving newsletters by means of the relevant declaration.

### 18.5.2.

The Data Controller engages the following company as a data processor:

#### **MORGENS Design Marketing Tanácsadó és Informatikai Szolgáltató Korlátolt Felelősségű Társaság**

Short name: MORGENS Design Kft.

Company registration number: 20-09-072782

Tax number: 23964710-2-20

Registered office: 8800 Nagykanizsa, Magyar utca 79, Hungary

Postal address: 8800 Nagykanizsa, Magyar utca 79, Hungary

Telephone: +36 70 642 0833

E-mail: [sales@morgens.hu](mailto:sales@morgens.hu)

Website: <https://morgens.hu/>

acting as the developer and maintenance provider of the newsletter software used by the Data Controller (hereinafter referred to as the "Data Processor").

### 18.5.3.

The processing covers the following personal data:

- your name;
- your e-mail address.

### 18.5.4.

The purpose of engaging the Data Processor is to ensure the information technology operation of the newsletter software used by the Data Controller and to carry out the technical processing operations necessary for its secure functioning.

### 18.5.5.

The processing is carried out electronically and is limited exclusively to technical operations necessary for the operation of the newsletter software.



## **18.6. Data Processing Related to the Loyal Guest Register**

18.6.1.

The data subjects concerned by the processing are those Guests using the hotel services who have consented to their inclusion in the Loyal Guest Register.

18.6.2.

The Data Controller engages the following company as a data processor:

### **Guestbook Rewards, Inc.**

Tax number: 5423500

Registered office: 10785 West Twain Avenue, Suite 100, Las Vegas, NV 89135, USA

Postal address: 10785 West Twain Avenue, Suite 100, Las Vegas, NV 89135, USA

E-mail: [contact@theguestbook.com](mailto:contact@theguestbook.com)

Website: <https://theguestbook.com/>

acting as the developer of the loyal guest register software (hereinafter referred to as the "Data Processor").

18.6.3.

The purpose of engaging the Data Processor is to ensure the operation of the loyal guest register software.

18.6.4.

The Data Processor processes the following personal data:

Your:

- surname;
- first name;
- e-mail address;
- purpose of stay (business, leisure, etc.).

In addition, data generated during your stay at the hotel:

- any additional services used;
- data relating to hotel consumption and purchases;
- room number used during the stay.

Within the Loyal Guest Register, the data of individual persons are not linked together. Accordingly, the data of persons accompanying you will not be associated with your personal data.

18.6.5.

The processing is carried out electronically.

### **18.7. Data Processing Related to the Vehicle Access Control System**

18.7.1.

The data subjects concerned by the processing are Guests arriving by vehicle at the parking area of the hotel operated by the Data Controller.

18.7.2.

The Data Controller engages the following company as a data processor:

#### **IdenSo Magyarország Korlátolt Felelősségű Társaság**

Short name: IdenSo Magyarország Kft.

Company registration number: 01-09-378592

Tax number: 23434206-2-41

Registered office: 1037 Budapest, Bokor utca 6, Hungary

Postal address: 1037 Budapest, Bokor utca 6, Hungary

E-mail: [sales@idenso.com](mailto:sales@idenso.com)

Website: <https://idenso.com/>

acting as the operator of the vehicle access control system used by the Data Controller.

18.7.3.

The processing covers the following data:

- vehicle registration number;
- times of entry into and exit from the parking area.

18.7.4.

The purpose of engaging the Data Processor is the automated monitoring and recording of vehicle entry to and exit from the accommodation premises, as well as the verification of parking authorisation.



18.7.5.

The processing is carried out electronically.

## **18.8. Data Processing Related to Invoice Generation**

18.8.1.

The data subjects concerned by the processing are Guests who use paid services provided by the Data Controller.

18.8.2.

The Data Controller engages the following company as a data processor:

### **MT-HostWare Számítástechnikai Korlátolt Felelősségű Társaság**

Short name: HostWare Kft.

Company registration number: 01-09-263594

Tax number: 10426917-2-42

Registered office: 1149 Budapest, Róna utca 120–122, Hungary

Postal address: 1149 Budapest, Róna utca 120–122, Hungary

Telephone: +36 1 469 9000

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

Website: <http://hostware.hu/>

acting as the developer and maintenance provider of the invoicing software used by the Data Controller (hereinafter referred to as the "Data Processor").

18.8.3.

The processing covers invoices and accounting documents containing the Guest's name and address, the description of the service(s) used, the date of purchase, the applicable fee, and any additional charges.

18.8.4.

The purpose of engaging the Data Processor is to ensure the information technology operation of the software used by the Data Controller for issuing invoices and to perform the technical processing activities necessary for its secure operation.

18.8.5.

The processing is carried out electronically and is limited exclusively to technical operations necessary for the operation of the software used for invoice generation.



## **18.9. Data Processing Related to Audit Services**

18.9.1.

The data subjects concerned by the processing are Guests whose data appear on accounting documents issued by the accommodation provider.

18.9.2.

The Data Controller engages the following company as a data processor:

### **Audit & Consulting Partner Könyvvizsgáló Korlátolt Felelősségű Társaság**

Short name: Audit & Consulting Partner Kft.

Company registration number: 13-09-192170

Tax number: 25357639-2-13

Registered office: 2081 Piliscsaba, Szent László király út 16, Hungary

Postal address: 2081 Piliscsaba, Szent László király út 16, Hungary

Website: <https://acpartner.hu/hu/>

acting as the statutory auditor of the Data Controller's business activities (hereinafter referred to as the "Data Processor").

18.9.3.

The processing covers accounting documents containing the Guest's name and address, the subject matter and date of purchase, the purchase price and, where applicable, additional charges.

18.9.4.

The purpose of engaging the Data Processor is to fulfil statutory accounting and auditing obligations applicable to the Data Controller through the services provided by the above-mentioned Data Processor.

18.9.5.

The processing consists exclusively of operations necessary for the fulfilment and verification of accounting obligations.



## **18.10. Data Processing Related to the Provision of E-mail Hosting Services**

### 18.10.1.

The data subjects concerned by the processing are the Guests referred to in this Privacy Notice with whom the Data Controller communicates by electronic mail.

### 18.10.2.

The Data Controller engages the following company as a data processor:

#### **Proxmox Server Solutions GmbH**

Company registration number: FN 258879f

Registered office: Bräuhausgasse 37, 1050 Vienna, Austria

Postal address: Bräuhausgasse 37, 1050 Vienna, Austria

E-mail: [office@proxmox.com](mailto:office@proxmox.com)

Website: <https://www.proxmox.com/>

acting as the provider of the hosting environment used for electronic correspondence (hereinafter referred to as the "Data Processor").

### 18.10.3.

The processing primarily covers your name and e-mail address and, secondarily, any additional information you provide in electronic correspondence.

### 18.10.4.

The purpose of engaging the Data Processor is to ensure the functioning of electronic mail communication.

### 18.10.5.

During the applicable retention periods, e-mails are stored within the software environment provided by the Data Processor; accordingly, data processing remains in effect throughout such periods.

## **18.11. Provider of the Electronic Room Key Card System**

### 18.11.1.

The data subjects concerned by the processing are Guests using the accommodation services.



18.11.2.

The Data Controller engages as a data processor the provider of the room key card system:

**KRISTÓ és TÁRSA Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság**

Short name: KRISTÓ és TÁRSA Kft.

Company registration number: 13-09-101619

Tax number: 13409973-2-13

Registered office: 2051 Biatorbágy, Szily Kálmán utca 6., Ground Floor, Hungary

Postal address: 2051 Biatorbágy, Szily Kálmán utca 6., Ground Floor, Hungary

Telephone: +36 23 530 008

E-mail: [info@onity.hu](mailto:info@onity.hu)

Website: <https://www.onity.hu/>

(hereinafter referred to as the "Data Processor").

18.11.3.

The processing covers the data stored within the room key card system (room card number and the room number currently assigned to it).

Based on these data, the Data Processor is unable to identify you, as the room number is linked to your name only within a separate property management system operated by the Data Controller during your stay.

Data relating to door openings are stored exclusively in the memory units of the electronic door locks. The Data Processor may access such data only during occasional on-site maintenance activities and only where this becomes technically necessary.

18.11.4.

The purpose of engaging the Data Processor is to ensure the information technology operation and continuous availability of the room key card system.

18.11.5.

The processing is carried out electronically and is limited exclusively to processing operations necessary for the provision of information technology services required to ensure the proper functioning of the room key card system.

The Data Processor does not process the data for its own purposes.

## 18.12. Data Processing Related to Transfer Services

### 18.12.1.

The data subjects concerned by the processing are Guests of the Data Controller who use the transfer service.

### 18.12.2.

The Data Controller engages the following sole proprietors as data processors:

#### **Imre Meszlényi, Sole Proprietor**

Registration number: 52320983

Tax number: 68836315-1-40

Registered office: 8360 Keszthely, Schwarz Dávid u. 57/B, Hungary

Postal address: 8360 Keszthely, Schwarz Dávid u. 57/B, Hungary

and

#### **Dr. Anita Mati, Sole Proprietor**

Registration number: 52003334

Tax number: 68617589-1-40

Registered office: 8360 Keszthely, Rózsa u. 7, Building B, 3rd Floor, Door 11, Hungary

Postal address: 8360 Keszthely, Rózsa u. 7, Building B, 3rd Floor, Door 11, Hungary

as providers of transfer services (hereinafter jointly referred to as the "Data Processors").

### 18.12.3.

The processing covers the following personal data:

- your name;
- your telephone number;
- your e-mail address.

### 18.12.4.

The purpose of engaging the Data Processors is to perform the transfer service requested by the Guest and to organise the transportation.

### 18.12.5.

The processing is carried out electronically.

18.13.

Apart from the Data Processors identified in this Privacy Notice, the Data Controller does not engage any additional data processors and does not disclose personal data to any other recipients.

Where required in connection with judicial or other official proceedings, the Data Controller shall provide the necessary personal data upon request by the competent authority or court.

## **19. Data Protection and Data Security**

19.1.

Within the scope of its data processing activities, the Data Controller ensures the security of personal data and implements technical and organisational measures, as well as internal procedures, to ensure compliance with applicable legislation and other data protection and confidentiality requirements.

In particular, the Data Controller protects the processed data against unauthorised access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction, damage, and loss of accessibility resulting from changes in technology.

19.2.

Personal data are processed solely for the lawful purposes described in this Privacy Notice, only to the extent necessary and proportionate to achieve those purposes, and subject to appropriate security measures in accordance with applicable laws and recommendations.

19.3.

For this purpose, the Data Controller stores personal data in separate databases according to the purpose of processing.

Access to such data is restricted to designated employees of the Data Controller who perform duties relating to the activities described in this Privacy Notice and whose job responsibilities include the protection and lawful handling of personal data in accordance with this Privacy Notice and applicable legislation.

19.4.

The Data Controller protects electronic data carriers using information security tools and measures appropriate to the current state of technology.

Data carriers are stored on systems connected to the Data Controller's internal network. Access to the internal network is only possible following multiple levels of individual hardware identification and software-based user authentication.

The network is further protected by antivirus and intrusion prevention solutions.

To ensure data security, the Data Controller has implemented, among others, the following measures:

- application of access management rules, authorisation levels and user authentication;
- operation of firewalls, endpoint protection and antivirus solutions;
- regular creation and verification of backups;
- regular updating of software and operating systems;
- logging and monitoring activities to detect incidents;
- restriction of access to personal data exclusively to authorised persons;
- enhancement of employee information security awareness through internal policies and training;
- use of encryption solutions for data transmission and storage where necessary.

The Data Controller regularly reviews these information security measures and adapts them to current technological, business and legal requirements.

19.5.

Physical storage media are kept in locked rooms designated for this purpose and accessible only to authorised persons.

19.6.

Only persons authorised to access the data may enter the storage facilities.

19.7.

The Data Controller's premises are continuously protected through the presence of employees and management personnel. Doors and windows not currently in use are secured with safety locks, while staff entrances are monitored by security personnel on a 24-hour basis.

19.8.

In contracts concluded with its data processors, the Data Controller requires them to ensure a level of data security and lawful data processing that complies with applicable legislation.

## **20. Rights of the Guest in Relation to Data Processing**

### 20.1. Right to Information

#### 20.1.1.

You may obtain information about data processing at any time by reading this Privacy Notice.

Upon request, oral information may also be provided, provided that your identity has been verified by other means.

You may request information both during and after the processing of your personal data.

The information provided covers all essential aspects of the processing as well as the methods for exercising your rights.

Upon request, the Data Controller shall also inform you about measures taken in response to your request—or the reasons for not taking such measures—and the available avenues for lodging complaints.

#### 20.1.2.

The provision of information is free of charge.

Where your request is manifestly unfounded or excessive, particularly because of its repetitive nature, the Data Controller may, taking into account the administrative costs involved:

- charge a reasonable fee; or
- refuse to act on the request.

#### 20.1.3.

The requested information shall be provided without undue delay and, in any event, within one month of receipt of the request.

### 20.2. Right of Access

#### 20.2.1.

You have the right to access the personal data concerning you.

Upon such request, the Data Controller shall inform you whether personal data relating to you are being processed and provide information regarding all material circumstances of the processing.

#### 20.2.2.

As part of your right of access, you may request a copy of your personal data processed by the Data Controller.

The first copy shall be provided free of charge. For any additional copies requested, the Data Controller may charge a reasonable fee based on administrative costs.

#### 20.2.3.

The copy shall be provided in a commonly used electronic format unless you request otherwise.

#### 20.2.4.

The Data Controller shall provide access without undue delay and, in any event, within one month of receipt of the request.

### 20.3. Right to Rectification

#### 20.3.1.

You have the right to obtain the rectification of inaccurate personal data concerning you without undue delay.

#### 20.3.2.

Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

#### 20.3.3.

Upon request, the Data Controller shall rectify or, where justified, complete inaccurate personal data concerning you without undue delay.

### 20.4. Right to Erasure

#### 20.4.1.

You have the right to obtain the erasure of personal data concerning you without undue delay, and the Data Controller shall be obliged to erase such personal data without undue delay where one of the following grounds applies:

a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

b) you withdraw the consent on which the processing is based and there is no other legal basis for the processing (within the scope of this Privacy Notice, this applies only to the processing activities based on consent described in the following chapters:

- 3. Data Processing Related to Reservation and Check-in – with regard to voluntarily provided special category data;
- 10. Data Processing Related to Completing Questionnaires;
- 13. Data Processing Related to the Loyal Guest Register;
- 16. Data Processing Related to Newsletter Distribution;
- 17. Data Processing Related to Personalisation of Newsletter Content);

c) you object to the processing and there are no overriding legitimate grounds for the processing (within the scope of this Privacy Notice, this applies only to the processing activities based on legitimate interest described in the following chapters:

- 7. Collection of Statistical Data Regarding the Use of Services;
- 9. Sending Satisfaction Survey Questionnaires);

d) the personal data have been processed unlawfully;

e) the personal data must be erased in order to comply with a legal obligation under European Union law or the law of a Member State to which the Data Controller is subject.

## **22. Enforcement of Rights**

### 22.1.

If you have any complaints regarding the processing of your personal data, you may primarily contact the Data Controller using the following contact details:

#### **HOTEL GARDEN Kft.**

E-mail: [info@lotustherme.net](mailto:info@lotustherme.net)

Postal address: 8380 Hévíz, Lótuszvirág utca 1, Hungary



22.2.

You may also exercise your legal rights before the courts or lodge a complaint with the National Authority for Data Protection and Freedom of Information:

**National Authority for Data Protection and Freedom of Information (NAIH)**

Address: 1055 Budapest, Falk Miksa utca 9–11, Hungary

Postal address: 1363 Budapest, P.O. Box 9, Hungary

Telephone: +36 1 391 1400

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

Website: <https://www.naih.hu/>

If you choose to bring legal proceedings before a court, you may also initiate the action before the competent Regional Court (Törvényszék) of your place of residence or habitual residence.

The adjudication of the case falls within the jurisdiction of the Regional Court.

22<sup>th</sup> May 2026

**HOTEL GARDEN Kft.**