

PRIVACY NOTICE

Effective from: 1 August 2023 updated: September, 2023

At Accent Hotels, we place great emphasis on protecting personal data. Therefore, we would like to introduce you to the data processing procedures that we apply in connection with providing our services in our online reservation system and in connection with our newsletter. Below, we inform you about what we do to protect your data and what data we record and process for what purpose.

1. INTRODUCTION:

Anna Grand Management Kft. (seat: 1137 Budapest, Jászai Mari tér 6., floor 5, door 36.; company registration number: 01-09-410955; VAT number: 32185900-2-41) (hereinafter: "**Controller**"), as operator of **Anna Grand Hotel**, accepts the content of this Privacy Notice as binding on it as Controller during the provision of its services.

The Controller processes the personal data of job applicants and employees as well as guests, contractual partners and personal contributors who use the Controller's services (hereinafter: "**Data Subject**"). The Controller undertakes to ensure that data processing related to its services complies with the applicable legislation and with the requirements set out in this privacy notice.

The Controller reserves the right to unilaterally modify this Notice. In view of this, it is recommended to regularly visit the www.annagrandhotel.hu website in order to monitor the changes. The effective content of the Notice can be accessed and saved here continuously. If the Data Subject's e-mail address is available to us, we will notify him/her about the changes by e-mail, upon request.

Upon request, we will send a copy of the effective Notice to the Data Subjects.

By providing the given personal data, the Data Subject declares to have read and expressly accepted the version of this Notice effective at the time when the data were provided.

The requirements set out in this Privacy Notice are in conformity with the current legislation on privacy:

- The Fundamental Law of Hungary (Freedom and responsibility, Article VI);
- 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)
- Act CXII of 2011 on the right to informational self-determination and on the freedom of information – (Info Act);
- Act V of 2013 on the Civil Code
- Act CLV of 1997 on consumer protection

1.1. Details of the Controller

Anna Grand Management Kft. (Anna Grand Hotel)

Seat: 1137 Budapest, Jászai Mari tér 6., floor 5, door 36

Contact details of the Controller, through which the Data Subjects can exercise their rights specified in this Notice:

E-mail: reservation@annagrandhotel.hu

Mailing address: 8230 Balatonfüred, Gyógy tér 1.

Telephone: +36 87 581 200

Website: www.annagrandhotel.hu

2. BASIC CONCEPTS OF PRIVACY

2.1. Personal data:

Any data that can be linked to a specific (identified or identifiable) natural person, a conclusion about the data subject that can be drawn from the data. In the course of data processing the personal data maintain this quality until their connection with the data subject can be restored. A person can especially be regarded as identifiable if s/he can be identified, directly or indirectly, based on his/her name, identification code or one or more factors specific to his/her physical, physiological, mental, economic, cultural or social identity;

2.2 Consent:

Voluntary and firm declaration of the data subject's wish, which is based on adequate information and with which s/he gives his/her clear consent to the processing of his/her personal data – in full or with regard to certain operations;

2.3 Objection:

The declaration of the data subject objecting to processing his/her personal data and requesting the termination of data processing and the erasure of the processed data;

2.4 Controller:

A natural or legal person or an organisation without a legal entity who or which determines the purpose of personal data processing, makes and implements decisions regarding data processing (including the device used) or has them implemented by the data processor commissioned by it;

2.5. Data processing:

Regardless of the applied procedure, any operation or set of operations performed on personal data, such as collection, registration, recording, organising, storage, alteration, use, transfer, disclosure, alignment or connection, blocking, erasure and destruction of the data, as well as preventing its further use. Photographing, sound or image recording as well as the recording of physical characteristics suitable for personal identification (such as fingerprints and palm prints, DNA sample and iris image) is also considered as data processing;

2.6. Data transfer:

Data transfer means making data accessible for a specific third party;

2.7 Disclosure:

Disclosure means making data accessible to any person;

2.8 Data erasure:

Making data unrecognisable in a way that they cannot be restored again;

2.9 Data blocking:

Making it impossible to transfer, access, disclose, transform, alter, destroy, erase, align or combine and use the data for a definite period of time or finally;

2.10 Data destruction:

Complete physical destruction of the data or the carrier recording the data;

2.11 Data processing:

Performing technical tasks related to data processing operations, regardless of the method and tool used to perform the operations as well as the place of application;

2.12 Data processor:

Any natural person or legal entity or organisation without a legal entity that processes personal data on commission by the Controller, also including commission pursuant to a rule of law;

2.13 Third party:

Any natural or legal person or organisation without a legal entity who is not the data subject, the controller or the data processor;

2.14. EEA State:

A member state of the European Union and another state that is a party to the agreement on the European Economic Area, as well as the state whose citizen enjoys the same legal status as a citizen of a state that is a party to the agreement on the European Economic Area based on an international treaty concluded between the European Community and its member states and between a state that is not a party to the agreement on the European Economic Area;

2.15. Third country:

Any state that is not an EEA state.

3. BASIC PRIVACY PRINCIPLES:

Personal data must be:

- a) processed lawfully, fairly and in a manner that is transparent to the data subject ("lawfulness, fairness and transparency");
- b) collected only for specific, clear and legitimate purposes, and must not be processed in a way that is incompatible with these purposes; in accordance with Article 89 (1) of the GDPR, further data processing for the purpose of archiving in the public interest, for scientific and historical research purposes or for statistical purposes is not considered incompatible with the original purpose ("purpose limitation");
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimisation");
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate for the purposes for which they are processed are erased or rectified without delay ("accuracy");
- e) stored in a form which permits identification of data subjects for no longer than what is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods only if the personal data are processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 (1) of the GDPR, also with regard to the implementation of the appropriate technical and organisational measures required by the above Regulation in order to safeguard the rights and freedoms of the data subject ("storage limitation");
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, by using appropriate technical or organisational measures ("integrity and confidentiality").

The controller is responsible for compliance with the above rules, and must be able to prove this compliance ("accountability").

4. THE DETAILED RULES OF DATA PROCESSING

Persons who have access to data:

- employees of the Controller;
- employees of the Data Processors defined below;
- certain authorities in relation to data that are requested by them during official procedures and that the Controller must provide by law;
- employees of the debt management company commissioned by the Controller for the purpose of managing overdue debts;
- other persons based on the Data Subject's express consent.

The Controller undertakes the obligation of strict confidentiality without any time limit with regard to the personal data that it processes, and may not disclose them to a third party, unless the Data Subject gives consent thereto.

The withdrawal of consent does not affect the legitimacy of earlier processing.

4.1. Data processing related to registration for room reservation and to the further use of data provided during registration:

Data Subjects must complete a registration form in order to use the Controller's services. The processed data are used further upon using certain services.

In the case of online reservation, some of the data are transferred to the Controller by individual accommodation agents, travel agencies and by the ACCENT HOTEL SOLUTIONS Szolgáltató Kft.

The circle of processed data and the purpose of data processing:

- Surname: required for identification, communication, contract fulfilment
- Given name: required for identification, communication, contract fulfilment
Services where these data are further used: e.g. Wellness service, spa visit, greeting card, transfer service, bicycle rental
- Citizenship: required for identification and contract fulfilment
- Identity card number or passport number: required for identification and contract fulfilment
Services where these data are further used: e.g. bicycle rental
- E-mail address: required for keeping contact
- Phone number: required for keeping contact
- Full address: required to fulfil the contract
- Billing address: required to fulfil the contract
Services where these data can be used further: Providing the use of various hotel services at the Data Subject's request
- Method of payment: required for contract fulfilment
- Preference for a special diet: serves to meet the tastes of the Data Subject, fulfilment of the contract
- Vehicle registration number: required for contract fulfilment
- Purpose of travel: required for contract fulfilment
Furthermore, for guests from outside the European Union:
- Passport number: fulfilment of a legal obligation
- Visa number: fulfilment of a legal obligation
- Time and place of entry into the country: fulfilment of a legal obligation

Legal ground for data processing

The legal ground for data processing is the fulfilment a contract (Article 6 (1) b) of the GDPR) and – where the law requires the processing and transfer of data (to local government, police) – the fulfilment of a legal obligation (Article 6 (1) f) of the GDPR).

Period of data processing

After the termination of the relationship with the Data Subject, the data are anonymised after five years based on Section 6:22 of the Civil Code. We store them for a longer period if required by law, for example, if we are obliged to store the data based on Section 169 of Act C of 2000 on accounting ("Accounting Act"), they are erased after eight years following the termination of the relationship with the Data Subject. In practice, this is the case where the data are part of documents that support accounting, for example they are included in documents related to the conclusion of contracts (or included in the contract itself) or in the issued invoice, or for six years in the case of a police report.

4.2. Data processing for bank card data

The Data Subject must provide these data during payment by bank card in order to ensure his/her reservation and its fulfilment.

In the case of online reservation, some of the data are transferred to the Controller by individual accommodation agents, travel agencies and by the ACCENT HOTEL SOLUTIONS Szolgáltató Kft.

The circle of processed data and the purpose of data processing:

- Name on bank card
- Bank card number
- Bank card expiry date

Legal ground for data processing

The legal basis for data processing is contract fulfilment (Article 6 (1) b) of the GDPR).

Period of data processing

The Controller processes the personal data for eight calendar days after the data subject's departure.

4.3. Regular guest programme:

The Controller provides personalised service and discounts for Data Subjects participating in the regular guest programme. The Data Subject can provide data to the Controller on the one hand electronically on the website, and on the other hand personally at the service partners.

The circle of processed data and the detailed purposes of data processing

- Surname: required for identification and communication
- Given name: required for identification and communication
- Date of birth: identification
- E-mail address: contact
- Delivery data (country, postal code, settlement, street, house number): necessary for sending the card by post
- Hotel reservation habits (in which hotel, in which year, month the Data Subject stayed): necessary for preparing statistics

Legal ground for data processing

The legal ground for data processing is the Data Subject's consent (Article 6 (1) point a) of the GDPR).

Period of data processing

The Controller manages the personal data until the consent of the Data Subject is withdrawn. You can withdraw your consent at any time by sending an email to info@accenthotels.com e-mail address.

4.4. Data processing for event-related requests for offer and orders:

The Data Subject (personal contributor of a legal entity) has the opportunity to request an offer for event organisation from the Controller and to submit an order to the Controller at the given accommodation.

The data are partly sent to the Hotel via data transfer by ACCENT HOTEL SOLUTIONS Szolgáltató Kft.

The circle of processed data and the detailed purpose of data processing

- Surname: identification, communication, contract fulfilment
- Given name: identification, communication, contract fulfilment
- Company name: identification, communication, contract fulfilment
- Name of personal contributor: identification, communication, contract fulfilment
- Telephone number: identification, communication, contract fulfilment
- E-mail address: identification, communication, contract fulfilment
- Meal requests: contract fulfilment
- Programme: contract fulfilment
- Room request: contract fulfilment
- Meeting room/hall request: contract fulfilment
- Date of the event: contract fulfilment
- Note: contract fulfilment

Legal ground for data processing

The legal ground for data processing is contract fulfilment (Article 6 (1) point b) of the GDPR and the legitimate interest of the Controller (Article 6 (1) point f) of the GDPR).

Period of data processing

If the Data Subject accepts the offer, the data are blocked five years after terminating the relationship with the Data Subject, based on Section 6:22 of the Civil Code. If we are obliged to store the data based on Section 169 of Act C of 2000 on accounting ("Accounting Act"), we will block the data eight years after terminating the relationship with the Data Subject. In practice, this is the case if the data are part of documents supporting accounting, for example they are shown in documents related to contracting (or in the contract itself) or in the issued invoice.

If the Data Subject does not accept the offer, the Controller will store the data for legitimate interests – storing the partners' previous offers is its direct business interest – and will block them three years later.

4.5. Data processing related to contracting with partners

The Controller contracts with various partners in order to ensure its services and to ensure the provision of services.

The circle of processed data and the detailed purpose of data processing

- Personal contributor's surname: required for identification, communication, contract fulfilment

- Personal contributor's first name: required for identification, communication, contract fulfilment
- Image: necessary to fulfil the contract (specifically in the case of a contract for photography)
- E-mail address: required for identification and communication
- Phone number: required for identification and communication
- Data related to a legal entity (name, seat, company registration number, VAT number): contract fulfilment

Legal ground for data processing

The legal basis for data processing is contract fulfilment (Article 6 (1) b) of the GDPR).

Period of data processing

After terminating the relationship with the Data Subject, the data are blocked five years later based on Section 6:22 of the Civil Code. If we are obliged to store the data based on Section 169 of Act C of 2000 on accounting ("Accounting Act"), we will block the data eight years after terminating the relationship with the Data Subject. In practice, this is the case if the data are part of documents supporting accounting, for example they are shown in documents related to contracting (in a given case in the contract itself) or in the issued invoice.

4.6. Data processing related to complaint management:

The Data Subject has the opportunity to complain about the service provided by the Controller.

The circle of processed data and the detailed purpose of data processing

- Surname: required for identification and communication
- Given name: required for identification and communication
- Address: required for identification and communication
- Content of the complaint: for investigating the complaint
- E-mail address: required for communication
- Phone number: required for communication

The legal ground for data processing:

The legal ground for data processing is Section 17/A (7) of Act CLV of 1997 on consumer protection.

Period of data processing

The Controller processes the personal data related to the complaint, the drawn up report and the copy of the reply letter for five years from the date of the complaint, according to the provisions of the Consumer Protection Act.

4.7 Assessment-related data processing

The Data Subject has the opportunity to assess the given accommodation. The assessment can also be completed anonymously, i.e. only the assessment section.

The circle of processed data and the detailed purpose of data processing

- Surname: required for identification and communication
- Given name: required for identification and communication

- E-mail address: required for identification and communication
- Date of stay: satisfaction measurement, statistical purpose
- Hotel assessment: satisfaction measurement, statistical purpose

Legal ground for data processing

The legal ground for data processing is the Data Subject's consent (Article 6 (1) point a) of the GDPR).

Period of data processing

The Controller processes the personal data **until the consent of the Data Subject is withdrawn**. You can withdraw your consent at any time by sending an email to the reservation@annagrandhotel.hu e-mail address.

4.8. Career:

The Controller provides the Data Subject with the opportunity to apply for the job advertised by it.

The purpose of data transfer is to coordinate the activities of the members of the hotel chain, to make service provision convenient and to supervise for the purpose of quality assurance.

The circle of processed data and the detailed purpose of data processing

- Surname: identification, contact
- Given name: identification, contact
- E-mail address: identification, contact
- Voluntarily provided personal data: may be necessary for selecting the right person for the position
- Personal data voluntarily provided in any document attached as an annex to the CV: may be necessary for selecting the right person for the position

Legal ground for data processing

The legal ground for data processing is the Data Subject's consent (Article 6 (1) point a) of the GDPR).

Period of data processing

After selecting the right person for the position to be filled, the Controller sends information to the other applicants concerned, notifying them that the employer did not choose them for the given position, and at the same time requests their express and voluntary consent in writing with regard to storing the CV and other related documents containing personal data. The purpose of data processing is to enable the Data Subject to participate in later tenders of the Hotel Chain in a simplified manner. The express consent of the data subject enables the processing of his/her personal data for a period of five years, after which the data will be anonymised.

If the Data Subject does not consent to storing his/her application material or personal data, the data will be anonymised **within 30 days**, and the CVs will be destroyed.

Recipient of data transfer:	Categories of transferred data
Accent Hotel Management Szolgáltató Kft. (seat: 1132 Budapest, Visegrádi utca 31., first floor; company registration number: 01 09 689708; VAT number: 12506527-2-41)	Surname, first name, e-mail address, voluntarily provided personal data, personal data voluntarily provided in any document attached as an annex to the CV: may be necessary for selecting the right person for the position.

4.9. Newsletter:

The Data Subject has the option to subscribe to the Controller's marketing newsletter. Accordingly, the Controller is entitled to send newsletters for direct marketing purposes – at a frequency and with content determined by the Controller – to Data Subjects who have subscribed to its newsletter, to the provided and, where applicable, subsequently modified e-mail address, containing information about the Controller's promotions and other activities.

The Controller does not send unsolicited advertising messages, and the Data Subject may unsubscribe free of charge from the sending of offers, without limitation and justification. In this case, we will delete all personal data – necessary for sending the newsletter – from the records, and we will not contact the Data Subject with further advertising offers. The Data Subject can unsubscribe from the newsletter at any time by clicking on the link in the message.

The circle of processed data and the purpose of data processing:

- Surname: identification, contact
- Given name: identification, contact
- E-mail address: we will send you current news here.

Legal ground for data processing

The legal ground for data processing is your consent, and under Section 6 of Act XLVIII of 2008 on the essential conditions of, and certain limitations to business advertising the Data Subject may give prior and express consent to the Service Provider to contact him/her with advertising offers and other messages at the provided contact details (e-mail).

Period of data processing

The Controller stores the personal data until the consent of the Data Subject is withdrawn.

Rights of data subjects related to data processing

The Data Subject may unsubscribe from the newsletter at any time free of charge.

4.10. The Controller's presence on social media sites (Facebook, Instagram, YouTube):

The hotel operated by the Controller is available on the Youtube, Facebook and Instagram social portals.

The data subject consents to the publication of news and offers by the Controller on his/her Facebook/Instagram message board by clicking the "like" link on the Controller's Facebook page (<https://www.facebook.com/annagrandhotel>) and by clicking on the "follow" link on the Instagram page (<https://www.instagram.com/annagrandhotel/?hl=hu>).

The operators of social media sites are separate controllers, who are independent from the Controller, so the activities carried out there are contained in data processing documents that are independent from the Controller.

You can get information about data processing on the Facebook and Instagram pages from the privacy guidelines and regulations on the Facebook website (www.facebook.com).

4.11. Data processing related to camera surveillance

The Controller carries out camera surveillance in the hotel area for the purpose of personal and property security.

The circle of processed data and the detailed purpose of data processing

- Face image: Security of persons and property

Installation of cameras

	Place of camera	Area monitored with camera	Persons staying in the monitored space
1	Apáti ház staff entrance	closed space in front of the door	employees
2	Wellness reception, above the counter	counter and entrance	employees, guests
3	Basement garage, level 1, staff entrance	in the low level part of the garage, in front of the entrance door	employees, guests
4	Basement garage exit on level 1, above the door	garage exit, wellness sundeck exit, fitness room back door	employees, guests
5	Hotel main entrance, towards Mediterranean court	in main entrance and courtyard section	employees, guests
6	Hotel main entrance, towards Gyógy tér	in main entrance and stairs section	employees, guests
7	Hotel reception	reception lobby	employees, guests
8	Lobby room, above the door	Lounge counter and wine safe	employees, guests
9	Lobby confectionery, in the corner, above the door	confectionery counter, entrance	employees, guests
10	Árkád Hall	persons coming towards the kitchen	employees, guests
11	Pantheon West	Árkád Hall entrance, office entrance	employees, guests
12	At service entrance, outside, above the door	service yard, both service entrances, laundry, store rooms	employees, guests

13	Service court, laundry and 1st store room corner, outside, above the door	service entrance gate, warehouses	employees, guests
14	Towards car park exit	car park, exit protected by a barrier	employees, guests
15	Ballroom, next to the artist's entrance	persons arriving towards the entrance	employees, guests
16	Office section, on the first floor by the access stairs	stairs and foyer	employees, guests
17	Basement garage, level 4, towards the hotel entrance door	hotel, garage side entrance	employees, guests
18	Opposite the car park entrance, on the garage roof, towards the barrier	barrier-protected entrance to the hotel area	employees, guests
19	Hotel basement garage, roof car park entrance, in the staircase	persons entering the hotel from the car park	employees, guests

Legal ground for data processing

The legal ground for data processing is the Controller's legitimate interest (Article 6 (1) f) of the GDPR).

Period of data processing

The Controller stores the data for eight days. In the event of a personal and property security incident, the Controller is entitled to process the recordings for more than eight days.

4.12. Data processing related to lost and found objects:

Purpose of data processing: administration of lost and found objects in the area of the Hotel operated by the Controller, notification of the presumed owner and the finder.

The legal ground for data processing: Sections 5:54, 5:55, 5:59 and 5:61 of Act V of 2013 on the Civil Code.

Scope of processed data: date and place of finding, name and contact of the finder, details of the found object.

Period of data processing: one year

5. PERSONS AUTHORISED FOR DATA PROCESSING:

The Controller uses the data processors listed in the table below to perform technical tasks related to data processing operations. The rights and obligations of data processors in relation to personal data processing are determined by the Controller within the framework of the GDPR and separate laws on data processing. The Controller is responsible for the legitimacy of the instructions given by it. The data processors may not make any decisions on the merit about data processing, they may process the personal data disclosed to them exclusively as instructed by the Controller, they may not process data for their own purposes and must store and preserve personal data according to the instructions of the Controller.

Name and contact of the data processors	Activities performed during data processing	Period of data processing
EOX Fejlesztő és Szolgáltató Korlátolt Felelősségű Társaság Seat: 1146 Budapest, Francia út 57/A	Has access to all personal data processed by the Controller on the basis of this Notice. Its task is to store personal data processed by the Controller.	Based on an open-ended contract until the termination of the contract, or for 30 days from the data subject's erasure request addressed to the controller and/or data processor.
NEXON Vállalkozási és Kereskedelmi Kft. Seat: 1138 Budapest, Váci út 185.	Performing payroll accounting tasks	Based on an open-ended contract, until the termination of the contract.
MORGENS Design Marketing Tanácsadó és Informatikai Szolgáltató Kft. Kapcsolat: 8800 Nagykanizsa, Csányi László utca 2. sales@morgens.hu https://morgens.hu/	RoomSome reservation system operation. Processing and storing data provided during accommodation reservation.	Based on an open-ended contract, until the termination of the contract.
Hostware Kft. Seat: 1149 Budapest, Róna utca 120-122.	Performing customer management tasks when using the Hostware Front Office hotel system. The service provider's privacy notice is available at the following link: https://www.hostware.hu/sites/pdf/Adatkezelesi_tajekoztato.pdf	Based on an open-ended contract, until the termination of the contract.

OTP Mobil Kft. Simple Seat: 1143 Budapest, Hungária krt. 17-19.	Conducting data communication required for payment transactions between the merchant and the payment service provider's system, customer service assistance for users, confirmation of transactions and fraud monitoring for the protection of users. The service provider's privacy notice is available at the following link: https://otpmobil.hu/adatkezelesitajekoztato/	Based on an open-ended contract, until the termination of the contract.
D-Edge SAS Direct Trade Representation of D-EDGE SAS in Hungary 1096 Budapest, Lenhossék utca 3. VAT number: 25283604143 Seat: 14/16 Boulevard Poissonnière, 75009 Paris, France	D-Edge Channel Manager for managing prices and available room capacities in one place, when using multiple sales channels. The service provider's privacy notice is available at the following link: https://www.d-edge.com/privacy-policy/	Based on an open-ended contract, until the termination of the contract.
ACCENT Hotel Management Kft. Seat: 1132 Budapest, Visegrádi u. 31., first floor	Has access to all personal data processed by the Controller on the basis of this Notice. Its task is to process and store personal data processed by the Controller.	
Booking.com B.V. Seat: Oosterdokskade 163, 1011 DL, Netherlands	Processing data provided during accommodation reservation.	Based on an open-ended contract, until the termination of the contract.
Expedia Inc Seat: 1111 Expedia Group Way, West Seattle, WA 98119, USA	Processing data provided during accommodation reservation.	Based on an open-ended contract, until the termination of the contract.
HRS GmbH Seat: Breslauer Platz 4., 50668 Cologne, Germany	Processing data provided during accommodation reservation.	Based on an open-ended contract, until the termination of the contract.
Szállás.hu Zrt. Seat: 3525 Miskolc, Régiposta utca 9.	Processing data provided during accommodation reservation.	Based on an open-ended contract, until the termination of the contract.
Hotelstart Kft. Seat: 1016 Budapest, Aladár u. 19. ground floor 3.	Processing data provided during accommodation reservation.	Based on an open-ended contract, until the termination of the contract.
Saxon Kft. Seat: 2600 Vác, Felső Törökhegy út	Website development and operation.	

100. M building, 1st floor 3.		
Google Ireland Limited Seat: Gordon House, Barrow Street, Dublin 4, Ireland		Based on an open-ended contract, until the termination of the contract.
Facebook/Instagram/ Meta Platforms Ireland Limited Merrion Road, Dublin 4, Ireland	Social media spaces	
OTP Pénztárszolgáltató Zrt. 1137 Bp. Váci út 135-139. Building A, 3rd floor	OTP Széchenyi leisure card acceptance contract	Based on an open-ended contract, until the termination of the contract.
OTP Bank Nyrt. 1051 Bp. Nádor u. 16	Card acceptance contract	Based on an open-ended contract, until the termination of the contract.
MBH Bank Nyrt. 1056 Bp. Váci u. 38. Tel:+36 1 268 7272	Széchenyi leisure card acceptance contract	Based on an open-ended contract, until the termination of the contract.
Flashover Kft. 8447 Ajka, Korányi Frigyes u. 237	Occupational and fire safety, environment protection	Based on an open-ended contract, until the termination of the contract.
PELSO-MED Egészségügyi és Szolgáltató Kft. 8230 Balatonfüred, Csárda utca 1.	Contract for conducting job aptitude tests	Based on an open-ended contract, until the termination of the contract.

In connection with the services that it provides, the Controller transfers data to the companies listed in the table below:

The recipient's name and contact details	Details of the data transfer
VIZA system (Guest Information Closed Database) Magyar Turisztikai Ügynökség Zrt. 1027 Budapest, Kacska u. 15-23.; 1525 Budapest, P.O. Box 97.;	The Controller transmits the guests' personal data in the manner required by law, i.e. records them in the VIZA system. The purpose of recording and simultaneously transferring the data is to protect the rights, the safety and the property of the data subject and others, as well as to monitor compliance with the provisions on the residence of

<p>Telephone: +36 1 488 8700; E-mail address: info@mtu.gov.hu;</p>	<p>third-country nationals and persons with the right to free movement and residence.</p>
<p>NTAK (National Tourism Data Supply Centre) Magyar Turisztikai Ügynökség Zrt. (MTÜ) 1027 Budapest, Kacsá u. 15-23.; 1525 Budapest, P.O. Box 97.; Telephone: +36 1 488 8700; E-mail address: info@mtu.gov.hu;</p>	<p>In the system operated by MTÜ, analyses are made from the data coming from accommodation management software to support data-driven decision-making in the tourism industry. The territorially competent local governments and NAV (Tax Authority) also have access to the data that are relevant to them.</p>
<p>Competent authorities (NAV, OEP (National Health Insurance Fund), local government, investigating authorities, anti-terrorism agencies, national security services, prosecutor's office and courts)</p>	<p>The accommodation provider keeps records of the entry and stay of third-country nationals in accordance with the relevant law. These data and other personal data contained in the registry and in the guestbook are forwarded to the acting authority (e.g. police, national security authority, court, infringement authority, prosecutor's office) in cases defined by law (e.g. a crime or suspicion thereof, or a request for data in connection with a specific procedure). A report is made in all cases about the delivery and transfer of the data.</p>

6. DATA SECURITY MEASURES

In relation to the personal data provided by the Data Subject, the Controller proceeds in conformity with Regulation 2016/679 of the European Parliament and Act CXII of 2011 on the right to informational self-determination and freedom of information.

The Controller takes all the necessary measures expected from it to ensure the security of the data, ensures an adequate level of their protection, especially against unauthorised access, modification, transmission, disclosure, erasure or destruction as well as accidental destruction and damage. The Controller ensures the security of the data with appropriate technical (e.g. logical protection, especially the encryption of passwords and communication channels) and organisational measures (physical protection, especially data security training for the Controller's employees, limiting access to information).

Please help us protect information by not using an obvious login name or password and by changing your password regularly, and please do not make your password accessible to anyone else.

7. INFORMATION RELATED TO CHILDREN

Persons under the age of 16 may not provide personal information about themselves, unless permission has been requested from a parent or guardian. The data of persons under the age of 16 are not processed, or they are processed in an anonymised manner if the consent given by the legal representative, parent, guardian or custodian is not available in connection with the data processing.

In the case of a Data Subject who has not reached the age of 14, his/her legal representative or guardian may provide personal data and make a legal declaration on his/her behalf.

A Data Subject who has reached the age of 14 but has not reached the age of 18 may provide personal data and may make a legal declaration only with the consent of his/her legal representative or guardian.

By providing the information, you declare and guarantee that you act in accordance with the above, and your capacity to act with regard to the provision of the information is not limited. If you are not legally entitled to provide the information independently, you are obliged to obtain the consent of the affected third parties (e.g. legal representative, guardian). In this context, you are obliged to consider whether the consent of a third party is necessary in connection with providing the given information. It may happen that the Controller does not come into personal contact with you, so you are obliged to ensure compliance with this paragraph and the Controller is not liable in this regard.

We make every reasonable effort to erase any information that has been made available to us without authorisation, and we ensure that this information is not passed on to others and not used by us (either for advertising or for other purposes). Please notify us immediately if you become aware of the fact that a child has disclosed unauthorised information about him/herself. You can contact us at the contact details highlighted at the beginning of the Notice.

8. THE RIGHTS OF DATA SUBJECTS REGARDING DATA PROCESSING

The privacy rights and legal remedies of the Data Subject as well as the relevant provisions and restrictions of the GDPR are specified in detail in the GDPR (in particular, in Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82). The most important provisions are summarised below.

Right of access by the Data Subject

The Data Subject is entitled to receive feedback from us as to whether his/her personal data are being processed. If such data processing is in progress, the Data Subject is entitled to access the personal data and the following information:

- a) the purposes of data processing;
- b) the categories of personal data concerned;
- c) the recipients or recipient categories to whom the personal data have been or will be disclosed, especially including recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if this is not possible, the criteria used to determine that period;
- e) the Data Subject has the right to request from us correction, erasure or restriction of processing the personal data concerning the Data Subject and to object to the processing of such personal data;

- f) the right to lodge a complaint with a supervisory authority; and
- g) any available information about the source of data if they were not collected from the Data Subject;
- h) the fact of automated decision-making, including profiling, and at least in these cases, information on the applied logic and on the significance of such data processing and on its expected consequences for the Data Subject.

If personal data are transferred to a third country, the Data Subject is entitled to receive information about the appropriate guarantees regarding the transfer.

A copy of the personal data that are subject to data processing will be provided to the Data Subject. If the Data Subject submitted the request by electronic means, the information must be provided in a commonly used electronic form, unless otherwise requested by the Data Subject.

Right to rectification

The Data Subject is entitled to request rectification of his/her inaccurate personal data without undue delay. The Data Subject is entitled to request the completion of incomplete personal data, for example by means of a supplementary statement.

Right to erasure (“right to be forgotten”)

(1) The Data Subject is entitled to have his/her personal data erased at his/her request without undue delay, if any 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 the consent on which data processing is based, and there is no other legal ground for data processing;
- c) the Data Subject objects to data processing and there is no overriding legal ground for data processing;
- d) the personal data were processed illegitimately;
- e) the personal data must be erased in order to fulfil a legal obligation under Union or Member State law that is applicable to us; or
- f) personal data were collected in connection with offering services concerning the IT society.

(2) If the Data Controller has disclosed the personal data and is obliged to delete them pursuant to paragraph (1), it shall take reasonable steps, including technical measures, by taking into account the available technology and the costs of implementation, in order to inform the data processing controllers that the Data Subject has requested them to erase the links to the personal data in question or the copy or duplicate of these personal data.

(3) Paragraphs (1) and (2) do not apply if data processing is necessary, for example:

- a) for exercising the right of freedom of expression and the right to information;
- b) for the purpose of fulfilling the obligation according to the EU or Member State law applicable to us, which requires the processing of personal data;
- c) for archiving purposes in the public interest, for scientific and historical research purposes or for statistical purposes if the right mentioned in paragraph (1) would seriously endanger that data processing, or would presumably render it impossible; or

- d) for submitting, enforcing or defending legal claims.

Right to restrict data processing

(1) The Data Subject has the right to request us to restrict data processing in any of the following cases:

- a) The Data Subject disputes the accuracy of the personal data, in which case the restriction applies to the period of time that allows us to verify the accuracy of the personal data;
- b) data processing is illegitimate and the Data Subject opposes the erasure of the data and requests the restriction of their use instead;
- c) we no longer need the personal data for the purpose of data processing, but the Data Subject needs them for submitting, enforcing or protecting legal claims; or
- d) the Data Subject objected to data processing; in this case, the restriction covers the period until it is established whether the Controller's legitimate reasons are given priority over the Data Subject's legitimate reasons.

If data processing is restricted under paragraph (1), such personal data may, with the exception of storage, only be processed with the Data Subject's consent or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural person or legal entity, or for reasons of important public interest of the Union or of a Member State.

We inform the Data Subject in advance about releasing the restriction of data processing.

Notification obligation regarding rectification or erasure of personal data or restriction of processing

The Controller informs all recipients to whom we have communicated personal data about any rectification, erasure or restriction on data processing, unless this proves impossible or requires a disproportionately great effort. Upon request, we inform the Data Subject about these recipients.

Right to data portability

(1) The Data Subject has the right to receive his/her personal data, which s/he provided to us, in a structured, commonly used and machine-readable format, and has the right to transmit those data to another controller without any hindrance by the Controller if:

- a) data processing is based on a consent or a contract; and
- b) data processing is automated.

When exercising his/her right to data portability pursuant to paragraph (1), the Data Subject has the right to request the direct transfer of personal data from one controller to another, where technically feasible.

Right to object

The Data Subject is entitled to object at any time against processing his/her personal data based on a rightful interest, for reasons related to his/her own situation, also including profiling. In this case we no longer process the personal data unless it is proved that data processing is justified by compelling legitimate reasons that override the interests, rights and freedoms of the Data Subject or that are attached to the establishment, exercise or defence of legal claims.

If personal data are processed for direct marketing, the Data Subject has the right to object at any time to processing the Data Subject's personal data for this purpose, including profiling, if it is related to direct marketing.

If the Data Subject objects to processing his/her personal data for direct marketing, the personal data may no longer be processed for such a purpose.

In the context of using information society services, and notwithstanding Directive 2002/58/EC, the Data Subject may also exercise his/her right to object by automated means based on technical specifications.

If personal data are processed for scientific and historical research purposes or for statistical purposes, the Data Subject has the right to object to processing his/her personal data for reasons related to his/her own situation, unless data processing is necessary for performing a task to be carried out for reasons of public interest.

Right to complain at the supervisory authority

The Data Subject can assert his/her rights at court based on the GDPR and the Civil Code, and s/he may turn to the National Authority for Data Protection and Freedom of Information (NAIH) (1055 Budapest, Falk Miksa utca 9-11.; mailing address: 1363 Budapest, Pf.: 9.; telephone: +36 1 391 1400; e-mail: ugyfelszolgalat@naih.hu) in case of a complaint about the data processing practices of the controller. The rights and legal remedies related to data processing are detailed in Articles 77, 79 and 82 of the GDPR.

Right to effective judicial remedy against the supervisory authority

The Data Subject is entitled to effective judicial remedy against the legally binding decision of the supervisory authority concerning the Data Subject.

The Data Subject is entitled to effective judicial remedy if the competent supervisory authority does not deal with the complaint or does not inform the Data Subject within three months about the procedural developments related to the submitted complaint or about its result.

Proceedings against the supervisory authority must be started at the court of the member state where the supervisory authority is based.

Right to effective judicial remedy against the controller or processor

The Data Subject is entitled to effective judicial remedy if, in his/her judgment, his/her rights under the GDPR have been violated as a result of not processing his/her personal data in conformity with the GDPR.

Proceedings against a controller or a processor must be brought to a court of the member state where the controller or processor is based. Such proceedings can also be started at the courts of the member state of the Data Subject's habitual residence.

Before starting any procedure, it is recommended to send the complaint to the controller.