

**PRIVACY NOTICE AND PROCESS DESCRIPTION ON THE PROCESSING RELATED TO THE
ACCOMMODATION SERVICE OF HOTEL KARDOSFA**

SEFAG Erdészeti és Faipari Zrt.(hereinafter: Controller) hereby informs you, pursuant to the provisions of Regulation of the European Parliament and of the Council (EU) 2016/679 (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, hereinafter: 'GDPR'), with this notice and a process description of all facts relating to the processing of your personal data. By participating in the process, you, as the data subject, become a data subject in the processing in accordance with this process description.

EXACT NAME AND CONTACT DETAILS OF THE CONTROLLER:

Controller name: SEFAG Erdészeti és Faipari Zártkörűen Működő Részvénytársaság
Abbreviated name of the controller: SEFAG Zrt.
Company reg. no. of the Controller: Cg. 14-10-300060
Controller's registered office: 7400 Kaposvár, Bajcsy-Zsilinszky u. 21.
E-mail address of the Controller: sefag@sefag.hu
Controller's representative: Fehér István, Chief Executive Officer

THE CONTACT DETAILS OF THE DATA PROTECTION OFFICER OF THE CONTROLLER:

Name: L-Tender Zrt.
E-mail address: adatvedelem@sefag.hu

OFFER REQUEST FOR HOTEL SERVICES

PURPOSE OF THE PROCESSING:

provision of an offer for the use of hotel services, room reservation.

LEGAL GROUND OF DATA PROCESSING:

Consent of the data subject pursuant to **Article 6(1)a) of the GDPR.**

PROCESSED DATA:

name, address, phone number, email address.

DATA PRESERVATION DEADLINE:

- if a reservation is not made, no later than the date specified in the offer request.
- if a reservation is made 8 years after the hotel reservation (Szvtv)

DATA STORAGE METHOD:

electronic

PROCESSORS INVOLVED IN THE PROCESSING AND INDICATION OF THE PROCESSING OPERATION:

- INTEGRANET Kft., operator of the www.somogyiturizmus.hu website
- **Aktív Digitál Kft.**, the maintainer of the www.hotelkardosfa.hu website,
- **HostWare Kft.**, the operator of the Hostware hostel reservation software,
- **NetHotelBooking Kft.** – Provision of online hotel reservation service via the RESnWEB system on the www.hotelkardosfa.hu website, operation of the pre-arrival e-mail module
Further processors involved by NetHotelBooking Kft. as processor.
 - LLC* Hostware Kft.
 - Triptease Limited
 - BIG FISH Payment Services Kft.
 - OTP Mobil Kft.
 - Barion Payment Zrt.

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- Creative Management Kft.
- Wildbit, LLC*

The data processor, Wildbit, LLC, is based in the United States, so any transfer of data to it is considered a data transfer to a third country. At the same time, Wildbit, LLC has included in the data protection addendum to its general terms and conditions the general privacy clauses proposed and approved by the European Commission. In view of this, the transfer of data to Wildbit, LLC is deemed to be adequately guaranteed even without the permission of a supervisory authority, and therefore there is no legal impediment to it.

IN THE COURSE OF THE PROCESSING, THE DATA ARE TRANSFERRED TO THE FOLLOWING THIRD PARTIES BASED ON THE LEGAL GROUND INDICATED:

the Controller does not transfer the data to third parties, but draws the attention of data subjects to the fact that the disclosure of personal data to courts and authorities may be required **by law**. If a court or authority requires the Company to provide personal data in the course of its legal proceedings, the Controller is obliged to provide the requested data to the court or authority in question in order to comply with its legal obligation.

THE FACT OF AUTOMATED DECISION-MAKING:

no automated decision-making is performed during the processing.

DESCRIPTION OF THE COURSE OF PROCESSING:

Regarding the services of Kardosfa Hotel, you can request an offer at the following e-mail addresses: info@kardosfa.hu, or recepicio@kardosfa.hu or by calling Hotel Kardosfa's phone numbers, or on the website www.somogyiturizmus.hu.

The name and e-mail address of the requesting person must be provided in all cases, and in some cases the data subject also provides the address and a telephone number.

The offer is sent to the e-mail address provided by the Controller.

The Controller allows data subjects to reserve hotel rooms online on the www.hotelkardosfa.hu website in order to book a room at Kardosfa Hotel quickly, conveniently and free of charge.

Registration and contact with the data subject take place on the ResnWeb interface on the www.hotelkardosfa.hu website.

RULES REGARDING THE EXERCISING OF DATA SUBJECT RIGHTS:

the Controller informs you that, pursuant to the GDPR, you may, after having verified your identity, exercise the following rights:

- request information about the processing of your personal data;
- request the rectification of your personal data;
- withdraw your consent to the processing, where the legal ground for the processing is the data subject's consent pursuant to Article 6(1) a) of the GDPR;
- request the erasure of your personal data (under the conditions set out in Article 17 (1) of the GDPR);
- request the restriction of the processing of your personal data;

ACCOMMODATION

PURPOSE OF DATA PROCESSING:

use of hotel services

LEGAL GROUND OF PROCESSING:

- Consent of the data subject pursuant to **Article 6(1)a) of the GDPR**, registration number, e-mail address, phone number,
 - furthermore, in the case of data related to special diets, special data are processed, the prohibition of which is waived by Article 9(2)(a) of the GDPR.
- **Article 6(1) b) of the GDPR**, processing is necessary for the performance of a contract to which the data subject is party, in relation to data defined in the GTC.

PROCESSED DATA:

- name, address (with the option to choose home or business address), place of birth, date of birth, gender (male/female) – for salutation, nationality, passport number or ID card number, phone number, e-mail address, arrival and departure times, guest's signature, for foreign persons, date and place of border crossing, vehicle registration number,
- for companies, additional data: company name, position, registered office,
- for credit card payment: cardholder's name, card type, expiry date, number, CVC code,
- SZÉP card details (ID, name on the card),
- further data that may be processed: food allergies, feather allergies, information regarding special dietary requirements.

DATA PRESERVATION DEADLINE:

- 5 years for personal data relating to a contractual relationship
- 8 years for personal data required for billing purposes (Sections 168-169 of Act C of 2000 on Accounting Act (hereinafter: Accounting Act))

DATA STORAGE METHOD: electronic and paper-based

PROCESSORS INVOLVED IN THE PROCESSING AND INDICATION OF THE PROCESSING OPERATION:

- **HostWare Kft.**, the operator of Hostware hotel reservation software,

IN THE COURSE OF THE PROCESSING, THE DATA ARE TRANSFERRED TO THE FOLLOWING THIRD PARTIES BASED ON THE LEGAL GROUND INDICATED:

personal data the law may stipulate its disclosure to courts and authorities. If a court or authority requires the Controller to provide personal data in the course of its legal proceedings, the Controller is obliged to provide the requested data to the court or authority in question in order to comply with its legal obligation.

THE FACT OF AUTOMATED DECISION-MAKING:

no automated decision-making is performed during the processing.

DESCRIPTION OF THE COURSE OF PROCESSING:

Data subjects using the accommodation service of Hotel Kardosfa fill in a registration form on-site, and their ID card is scanned into the Hostware guest registration program.

The Controller requests the following data on the registration form: phone number, e-mail address, ID card number, vehicle registration number and signature.

The data subject can declare their special dietary requirements, potentially indicating food intolerances or allergies.

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The Data Controller stores the data necessary for issuing invoices and documents related to accounting procedures for 8 years.

By accepting the General Terms and Conditions, a contract is established between the Controller and the data subject, and the documents confirming that are stored by the Controller for 5 years, the statute of limitations for civil claims.

RULES REGARDING THE EXERCISING OF DATA SUBJECT RIGHTS:

the Controller informs you that, pursuant to the GDPR, you may, after having verified your identity, exercise the following rights:

- withdraw your consent to the processing, where the legal ground for the processing is the data subject's consent pursuant to Article 6(1) a) of the GDPR;
- request information about the processing of your personal data,
- request the rectification of your personal data,
- withdraw your consent to processing,
- request the erasure of your personal data (under the conditions set out in Article 17 (1) of the GDPR),
- request the restriction of the processing of your personal data,
- exercise the right to data portability (when the processing is performed by automated means pursuant to Article 6(1) a) of the GDPR).

PROCESSING RELATING TO SATISFACTION SURVEYS

THE PURPOSE OF PROCESSING:

requesting feedback from hotel guests for the further development and improvement of services.

LEGAL GROUND OF DATA PROCESSING:

Article 6 (1) f) of the GDPR necessary for the enforcement of the legitimate interests of the controller or a third party.

INDICATION OF LEGITIMATE INTEREST:

The Controller has a legitimate interest in receiving information for the development of its services based on feedback.

PROCESSED PERSONAL DATA:

name, gender, e-mail address.

DURATION OF PROCESSING:

2 years following the last day of the stay according to the reservation.

THE METHOD OF PROCESSING:

electronic, paper-based

PROCESSORS INVOLVED IN THE PROCESSING AND INDICATION OF THE PROCESSING OPERATION:

- **NetHotelBooking Kft.** – Via the RESnWEB system on the www.hotelkardosfa.hu website

Further processors involved by **NetHotelBooking Kft.** as a processor:

- Creative Management Kft.
- Wildbit, LLC*

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The data processor, Wildbit, LLC, is based in the United States, so any transfer of data to it is considered a data transfer to a third country. At the same time, Wildbit, LLC has included in the data protection addendum to its general terms and conditions the general privacy clauses proposed and approved by the European Commission. In view of this, the transfer of data to Wildbit, LLC is deemed to be adequately guaranteed even without the permission of a supervisory authority, and therefore there is no legal impediment to it.

POSSIBLE CONSEQUENCES OF THE FAILURE TO PROVIDE THE REQUIRED DATA: The data subject does not receive a satisfaction survey from the Controller.

IN THE COURSE OF THE PROCESSING, THE DATA ARE TRANSFERRED TO THE FOLLOWING THIRD PARTIES BASED ON THE LEGAL GROUND INDICATED:

the Controller does not transfer the data to third parties, but draws the attention of data subjects to the fact that the disclosure of personal data to courts and authorities may be required by law. If a court or authority requires the Company to provide personal data in the course of its legal proceedings, the Controller is obliged to provide the requested data to the court or authority in question in order to comply with its legal obligation.

THE FACT OF AUTOMATED DECISION-MAKING:

no automated decision-making is performed during the processing.

DESCRIPTION OF THE COURSE OF PROCESSING:

After the stay of guests using the hotel service, a questionnaire will be filled out via the ResnWeb system, e-mail, or on paper, with the aim of understanding the guest's impressions and suggestions.

It can be filled in by the Controller or at the guest's own initiative.

The guest optionally returns their comments to the Controller via e-mail, or hands in the paper questionnaire at reception, or leaves it in the room.

The feedback can be assessed promptly, i.e., immediately after the stay, or after a certain period has elapsed.

RULES REGARDING THE EXERCISING OF DATA SUBJECT RIGHTS:

the Controller informs you that, pursuant to the GDPR, you may, after having verified your identity, exercise the following rights:

- request information about the processing of your personal data;
- request the rectification of your personal data;
- request the erasure of your personal data (under the conditions set out in Article 17 (1) of the GDPR)
- request the restriction of the processing of your personal data;
- may object to data processing;

PROCESSING RELATING TO THE PURCHASE OF GIFT VOUCHERS

THE PURPOSE OF PROCESSING:

sale of gift vouchers and delivery to the recipient upon request.

LEGAL GROUND OF DATA PROCESSING:

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.

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PROCESSED PERSONAL DATA:

salutation; surname and first name; home address (country, post code, city, street, house number); phone number; e-mail address (of both the donor and the recipient)

DURATION OF PROCESSING:

- 5 years (Ptk) regarding the data of the donor and the recipient (Civil Code)
- 8 years for the data necessary for the Controller to fulfil its accounting obligations (Accounting Act)

DATA STORAGE METHOD:

electronic and paper-based

PROCESSORS INVOLVED IN THE PROCESSING AND INDICATION OF THE PROCESSING OPERATION:**IN THE COURSE OF THE PROCESSING, THE DATA ARE TRANSFERRED TO THE FOLLOWING THIRD PARTIES BASED ON THE LEGAL GROUND INDICATED:**

the Controller does not transfer the data to third parties, but draws the attention of data subjects to the fact that the disclosure of personal data to courts and authorities may be required by law. If a court or authority requires the Company to provide personal data in the course of its legal proceedings, the Controller is obliged to provide the requested data to the court or authority in question in order to comply with its legal obligation.

THE FACT OF AUTOMATED DECISION-MAKING:

no automated decision-making is performed during the processing.

DESCRIPTION OF THE COURSE OF PROCESSING:

the donor requests the gift card by phone, in person, or via e-mail.

The Controller prepares the requested content and then delivers the gift to the appropriate location (by post, electronically, or by personal collection) according to the donor's request.

RULES REGARDING THE EXERCISING OF DATA SUBJECT RIGHTS:

the Controller informs you that, pursuant to the GDPR, you may, after having verified your identity, exercise the following rights:

- request information about the processing of your personal data;
- request the rectification of your personal data;
- request the erasure of your personal data (under the conditions set out in Article 17 (1) of the GDPR)
- request the restriction of the processing of your personal data;

PROCESSING RELATING TO THE USE OF LOYALTY CARDS**PURPOSE OF DATA PROCESSING:**

supply of loyalty cards issued by Hotel Kardosfa to guests.

LEGAL GROUND OF PROCESSING:

Consent of the data subject pursuant to **Article 6(1)a) of the GDPR**.

- furthermore, in the case of data related to special diets, special data are processed, the prohibition of which is waived by Article 9(2)(a) of the GDPR.

PROCESSED DATA:

- **on SEFAG Zrt. loyalty card:**
name, e-mail address, phone number, expiry date, serial number

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- recorded in SEFAG Zrt's Hotel software, the Hostware system:
name, home address, gender, date of birth, e-mail address, phone number, card serial number, unique information related to the guest: permanent setup, pets etc., food allergy, favourite room, preferred meal, preferred drink

DATA PRESERVATION DEADLINE:

5 years from the receipt of the card, or until the data subject's deletion request.

DATA STORAGE METHOD:

electronic

PROCESSORS INVOLVED IN THE PROCESSING AND INDICATION OF THE PROCESSING OPERATION:

- **HostWare Kft.**, the operator of Hostware hotel reservation software,

IN THE COURSE OF THE PROCESSING, THE DATA ARE TRANSFERRED TO THE FOLLOWING THIRD PARTIES BASED ON THE LEGAL GROUND INDICATED:

the Controller does not transfer the data to third parties, but draws the attention of data subjects to the fact that the disclosure of personal data to courts and authorities may be required by law. If a court or authority requires the Company to provide personal data in the course of its legal proceedings, the Controller is obliged to provide the requested data to the court or authority in question in order to comply with its legal obligation.

THE FACT OF AUTOMATED DECISION-MAKING:

no automated decision-making is performed during the processing.

DESCRIPTION OF THE COURSE OF PROCESSING:

the guest becomes eligible for the card if they book at Kardosfa Hotel at least twice.

The cardholder is entitled to use the discounts offered by Hotel Kardosfa. The scope of services covered by the loyalty scheme is included in the General Terms and Conditions of Hotel Kardosfa at any given time.

The cardholder must indicate the card's serial number and their details for loyalty status at the time of reservation.

RULES REGARDING THE EXERCISING OF DATA SUBJECT RIGHTS:

the Controller informs you that, pursuant to the GDPR, you may, after having verified your identity, exercise the following rights:

- request information about the processing of your personal data;
- request the rectification of your personal data;
- withdraw their consent to the processing;
- request the erasure of your personal data (under the conditions set out in Article 17 (1) of the GDPR)
- request the restriction of the processing of your personal data;

PROCESSING RELATING TO SENDING NEWSLETTERS

PURPOSE OF DATA PROCESSING:

maintaining contact via newsletters with partners, guests, and potential guests, in order for the Controller to recommend its services, novelties, current offers, and programmes to the data subjects.

LEGAL GROUND OF PROCESSING:

consent of the data subject pursuant to **Article 6(1)a of the GDPR.**

PROCESSED DATA:

name, e-mail address of the data subject.

DATA PRESERVATION DEADLINE:

until the end of the newsletter service, but if the data subject requests the erasure of their data (unsubscribes from the newsletter), immediately after their request for erasure.

DATA STORAGE METHOD:

electronic

PROCESSORS INVOLVED IN THE PROCESSING AND INDICATION OF THE PROCESSING OPERATION:

Aktív Digitál Kft., the maintainer of the www.hotelkardosfa.hu website,

NetHotelBooking Kft. – Provision of online hotel reservation via the RESnWEB system on the www.hotelkardosfa.hu website, operation of the pre-arrival e-mail module

Further processors involved by NetHotelBooking Kft. as processor.

- Creative Management Kft.
- Wildbit, LLC*

* The data processor, Wildbit, LLC, is based in the United States, so any transfer of data to it is considered a data transfer to a third country. At the same time, Wildbit, LLC has included in the data protection addendum to its general terms and conditions the general privacy clauses proposed and approved by the European Commission. In view of this, the transfer of data to Wildbit, LLC is deemed to be adequately guaranteed even without the permission of a supervisory authority, and therefore there is no legal impediment to it.

IN THE COURSE OF THE PROCESSING, THE DATA ARE TRANSFERRED TO THE FOLLOWING THIRD PARTIES BASED ON THE LEGAL GROUND INDICATED:

the Controller does not transfer the data to third parties, but draws the attention of data subjects to the fact that the disclosure of personal data to courts and authorities may be required by law. If a court or authority requires the Company to provide personal data in the course of its legal proceedings, the Controller is obliged to provide the requested data to the court or authority in question in order to comply with its legal obligation.

THE FACT OF AUTOMATED DECISION-MAKING:

no automated decision-making is performed during the processing.

DESCRIPTION OF THE COURSE OF PROCESSING:

the Data Subject declares on the www.hotelkardosfa.hu website, via the ResnWeb system, on the registration form completed at the hotel, or via e-mail, that they wish to receive information about the hotel services of the Controller via e-mail as a newsletter.

Subsequently, the newsletter will be sent periodically and occasionally to the Data Subjects with content prepare by the Controller.

The e-mail user concerned may unsubscribe from the newsletter directly at any time, free of charge.

RULES REGARDING THE EXERCISING OF DATA SUBJECT RIGHTS:

the Controller informs you that, pursuant to the GDPR, you may, after having verified your identity, exercise the following rights:

- request information about the processing of your personal data;
- request the rectification of your personal data;
- withdraw their consent to the processing;
- request the erasure of your personal data (under the conditions set out in Article 17 (1) of the GDPR)
- request the restriction of the processing of your personal data;

PROCESSING RELATING TO ARREARS MANAGEMENT:

PURPOSE OF DATA PROCESSING:

processing of customer data in the service area of the Controller for the purpose of arrears management.

PROCESSED DATA:

name; maiden name; mother's name; place of birth; date of birth; permanent address; telephone number; postal address, amount of arrears

LEGAL GROUND OF THE PROCESSING:

Article 6(1) f) of the GDPR, the processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party.

LEGITIMATE INTEREST OF THE CONTROLLER:

In connection with the Controller's service activities, for customers who have arrears, the resulting outstanding debts will be collected by the Controller, or by their appointed lawyer, or by a debt collection company appointed by them.

This activity is in the legitimate business interest of the Controller, as with a large customer base, outstanding debts can amount to a large sum, and the failure to collect these debts can cause significant damage to the Controller.

PRESERVATION PERIOD OF THE PERSONAL DATA:

until the settlement of arrears or the expiry of the limitation period for civil claims relating to the arrears or other legal proceedings (5 years)

DATA STORAGE METHOD: electronic and paper-based

PROCESSORS INVOLVED IN THE PROCESSING AND INDICATION OF THE PROCESSING OPERATION:

the Controller does not involve a processor in the processing.

IN THE COURSE OF THE PROCESSING, THE DATA ARE TRANSFERRED TO THE FOLLOWING THIRD PARTIES BASED ON THE LEGAL GROUND INDICATED:

recipient of the data transfer:

- EULER HERMES SA Hungarian Branch Office (1139 Budapest, Váci út 99.)
- Dr. Szilárd Radnai (7400 Kaposvár, Bajcsy-Zs. u. 21.)

In addition, if a court or authority requires the Company to provide personal data in the course of its legal proceedings, the Controller is obliged to provide the requested data to the court or authority in question in order to comply with its legal obligation.

THE FACT OF AUTOMATED DECISION-MAKING:

no automated decision-making is performed during the processing.

DESCRIPTION OF THE COURSE OF PROCESSING:

the Controller has a contractual relationship with claims management companies or individual lawyers, to whom it only delegates the administration of the case, retaining the claim.

During the transfer of the case, the specific customer data relating to the arrears can be accessed and handled by the appointed companies.

The accounting team of the Controller continuously monitors and controls the financial performance of the invoices, and keeps detailed records of payments received.

If the customer or partner is in arrears, the accounting team will send a payment request to the invoice payer.

If the invoice payer does not comply with the request within 8 days, or they do not accept the request or refuse to accept it, the document shall be deemed served on the day of the attempted service, and if the Controller receives a 'not sought' return receipt from the addressee, the document shall be deemed served on the fifth working day following the second attempted service.

If the invoice payer settles the full amount of arrears after receiving the notice, the case is considered closed.

If the invoice payer fails to comply with the request within 8 days of receipt, the accounting group will initiate an order for payment procedure against the invoice payer.

If the debtor objects to the order for payment at the notary, the case will be referred to the courts.

In this case, the Controller is represented in court by its legal representative.

RULES REGARDING THE EXERCISING OF DATA SUBJECT RIGHTS:

the Controller informs you that, pursuant to the GDPR, you may, after having verified your identity, exercise the following rights:

- request information about the processing of your personal data;
- request the rectification of your personal data;
- request the erasure of your personal data (under the conditions set out in Article 17 (1) of the GDPR)
- request the restriction of the processing of your personal data;
- may object to data processing;

PROCESSING RELATING TO COMPLAINT HANDLING:

THE PURPOSE OF PROCESSING:

recording of complaints related to service activities, handling of complaints related to service activities.

LEGAL GROUND OF THE PROCESSING:

- **Article 6(1) c) of the GDPR**, fulfilment of a legal obligation; and Section 17/A (5) of Act CLV of 1997 on Consumer Protection;
- Consent of the data subject pursuant to **Article 6(1)a) of the GDPR**.

PROCESSED DATA:

data processed based on a legal obligation: name of the complainant, address/place of residence, method of notification, service complained about, description of the complaint, reason for the complaint, the claim of the complainant, other data necessary to substantiate the complaint if relevant, other data necessary to investigate and respond to the complaint.

Data processed with the consent of the data subject, for facilitating and improving the effectiveness of communication: mailing address and telephone number of the data subject;

PRESERVATION PERIOD OF THE PERSONAL DATA:

the Controller must keep a record of the complaint and a copy of the reply for 3 years and provide them to the supervisory authorities upon request [Section 17/A (7) of the Consumer Protection Act].

PROCESSORS INVOLVED IN THE PROCESSING AND INDICATION OF THE PROCESSING OPERATION:

the Controller does not involve a processor in the processing.

IN THE COURSE OF THE PROCESSING, THE DATA ARE TRANSFERRED TO THE FOLLOWING THIRD PARTIES BASED ON THE LEGAL GROUND INDICATED:

the Controller does not transfer the data to third parties, but draws the attention of data subjects to the fact that the disclosure of personal data to courts and authorities may be required by law. If a court or authority requires the Controller to provide personal data in the course of its legal proceedings, it is obliged to provide the requested data to the court or authority in question in order to comply with its legal obligation.

THE FACT OF AUTOMATED DECISION-MAKING:

no automated decision-making is performed during the processing.

DESCRIPTION OF THE COURSE OF PROCESSING:

Data subjects have the option to lodge a complaint about the services of Hotel Kardosfa.

A complaint can be lodged in person at the hotel reception, by post, by telephone or by e-mail.

The Controller investigates a verbal complaint immediately and, if necessary, remedies the situation. If the guest does not agree with the handling of the complaint or the complaint cannot be investigated immediately, a record will be prepared and a copy will be provided to the guest.

The official record of the complaint shall include the following:

- a) guest name;
- b) the guest's residential address, registered office, and, where necessary, postal address;
- c) place, time and manner of lodging the complaint;
- d) a detailed description of the guest's complaint, with a separate record of the objections relating to the complaint, in order to ensure that all the objections contained in the guest's complaint are fully investigated;
- e) a list of documents, records and other evidence produced by the guest;
- f) the signatures of the person who prepared the official record and the guest (the latter formality is required for verbal complaints made in person);
- g) the place and date of making the record.

RULES REGARDING THE EXERCISING OF DATA SUBJECT RIGHTS:

the Controller informs you that, pursuant to the GDPR, you may, after having verified your identity, exercise the following rights:

- withdraw your consent to the processing, where the legal ground for the processing is the data subject's consent pursuant to Article 6(1) a) of the GDPR;
- request information about the processing of your personal data,

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- request the rectification of your personal data,
- withdraw your consent to processing,
- request the erasure of your personal data (under the conditions set out in Article 17 (1) of the GDPR),
- request the restriction of the processing of your personal data,
- exercise your right to data portability (when the processing is performed by automated means pursuant to Article 6(1) a) of the GDPR).

DATA SUPPLY TO THE NATIONAL TOURISM DATA SUPPLY CENTRE

PURPOSE OF DATA PROCESSING:

fulfilment of data supply as required by law by the accommodation provider.

LEGAL GROUND OF PROCESSING:

necessary to comply with the Controller's legal obligation (**Article 6 (1) (c) of the GDPR**) pursuant to the following legal regulations:

- Chapter II/A, Section 6/B of Act XCVII of 2018; (regarding citizens of the European Union)
- Section 9 (1) of Act XCVII of 2018; Section 75 (1)(h) of Act I of 2007 on the entry and stay of persons with the right to free movement and residence (hereinafter: Szmtv.);
- Section 10 (1) of Act XCVII of 2018 in relation to the amendment of Act II of 2007 on the Admission and Right of Residence of Third-Country Nationals (hereinafter: Harmtv.);

PROCESSED DATA:

identifier generated based on name, country of birth, date of birth, residential post code, for foreigners, date and place of border crossing

- Act XCVII of 2018 on the amendment of Act CLVI of 2016 on the State's Responsibilities Regarding the Development of Tourism Regions and related acts,
- Government Decree 235/2019 (15 October) on the implementation of Act CLVI of 2016 on the State's Responsibilities Regarding the Development of Tourism Regions
- Government Decree 239/2009 (20 October) on the detailed conditions of engagement in accommodation service activities and the procedure for the issuance of accommodation licences

DATA PRESERVATION DEADLINE:

- 1 year from the data provision for EU citizens
- 5 years from the data provision for citizens of third countries

DATA STORAGE METHOD:

electronic

PROCESSORS INVOLVED IN THE PROCESSING AND INDICATION OF THE PROCESSING OPERATION:

name of the processor: National Tourism Data Supply Centre (Hungarian abbreviation NTAK)

IN THE COURSE OF THE PROCESSING, THE DATA ARE TRANSFERRED TO THE FOLLOWING THIRD PARTIES BASED ON THE LEGAL GROUND INDICATED:

the Controller does not transfer the data to third parties, but draws the attention of data subjects to the fact that the disclosure of personal data to courts and authorities may be required by law. If a court or authority requires the Controller to provide personal data in the course of its legal proceedings, the Controller is obliged to provide the requested data to the court or authority in question in order to comply with its legal obligation.

THE FACT OF AUTOMATED DECISION-MAKING:

no automated decision-making is performed during the processing.

DESCRIPTION OF THE COURSE OF PROCESSING:

During hotel services, the Controller records the data of the data subjects in a data storage provided by a hosting service provider designated by a government decree, through the Hostware hotel management software, as required by law, and stores them for 1 year.

The National Tourism Data Reporting Centre receives non-identifiable statistical data about the stored data.

In the event of official proceedings, authorities directly contact the Controller to obtain personal data. During hotel services, the relevant data from the data recorded in the Hostware system are transferred to the NTAk online system during the daily closing.

Pursuant to Act XCvII of 2018, the immigration authorities have direct access to the personal data recorded in the data storage for those covered by Act I of 2007 on the entry and stay of persons with the right to free movement and residence, and Act II of 2007 on the entry and stay of third-country nationals, they take over the data in all cases, maintain records, and store them for 5 years.

RULES REGARDING THE EXERCISING OF DATA SUBJECT RIGHTS:

the Controller informs you that, pursuant to the GDPR, you may, after having verified your identity, exercise the following rights:

- request information about the processing of your personal data;
- request the rectification of your personal data;
- request the erasure of your personal data (under the conditions set out in Article 17 (1) of the GDPR)
- request the restriction of the processing of your personal data;

PROCESSING RESULTING FROM THE OPERATION OF AN ELECTRONIC SURVEILLANCE SYSTEM

THE PURPOSE OF PROCESSING:

Monitoring by electronic surveillance systems and cameras to protect the property of the Controller and the property of persons staying in the building, and to protect the life and physical integrity of persons staying in the building.

LEGAL GROUND OF THE PROCESSING:

Article 6(1) f) of the GDPR, the processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party.

LEGITIMATE INTEREST OF THE CONTROLLER:

It is in the legitimate economic interest of the Controller to use an electronic surveillance system in the building it owns to improve its property protection situation, under the conditions defined in Act CXXXIII of 2005 on the Rules of Private Investigation Services.

The Controller has a legitimate interest in protecting its buildings and the assets stored therein.

Within this framework, it has a legitimate interest in detecting violations, apprehending perpetrators, preventing these unlawful acts, and, if necessary, using the recordings in connection with them as evidence in court or other official proceedings.

SCOPE OF THE DATA PROCESSED:

the image of the data subject, the data that can be obtained from a camera image (location, time of stay).

PRESERVATION PERIOD OF THE PERSONAL DATA:

the recording is erased after 3 working days from the date of recording if not used.

PROCESSORS INVOLVED IN THE PROCESSING AND INDICATION OF THE PROCESSING OPERATION:

No data processor is involved.

IN THE COURSE OF THE PROCESSING, THE DATA ARE TRANSFERRED TO THE FOLLOWING THIRD PARTIES BASED ON THE LEGAL GROUND INDICATED:

the Controller does not transfer the data to third parties, but draws the attention of data subjects to the fact that the disclosure of personal data to courts and authorities may be required by law. If a court or authority requires the Controller to provide personal data in the course of its legal proceedings, the Controller is obliged to provide the requested data to the court or authority in question in order to comply with its legal obligation.

THE FACT OF AUTOMATED DECISION-MAKING:

no automated decision-making is performed during the processing.

DESCRIPTION OF THE COURSE OF PROCESSING:

The Controller operates an electronic surveillance system based on legitimate interest as defined in Act CXXXIII of 2005 on the Rules of Security Services and the Activities of Private Investigators (hereinafter: 'Security Services Act') in the building of Hotel Kardosfa with 4 cameras.

The camera recordings are stored on the Data Controller's own server. on the on-site NVR storage unit, on a hard drive.

GUARANTEE RULES RELATING TO ELECTRONIC SURVEILLANCE

the Controller shall use the electronic Surveillance system only to the extent necessary to interfere with the privacy of the data subjects.

The Data Controller does not conduct electronic surveillance for any reason or in any way:

- for the purpose of monitoring the work intensity of an employee,
- for the purpose of influencing the behaviour of employees at work,
- in sensitive premises, especially changing rooms, showers and toilets,
- in an area where workers spend their rest periods or breaks from work or rest time, in particular in a rest room or designated smoking area,
- in public areas.

However, the Controller may conduct electronic monitoring for the purpose of making sure that employees comply with the provisions applicable to them in order to ensure safe and healthy working conditions.

RESTRICTION OF AND ACCESS TO RECORDED CAMERA IMAGES

the recordings recorded by the electronic surveillance system may only be viewed by persons authorised to view them and may only be restricted by persons with a right of restriction. The right of access and restriction may be granted only by an executive officer, and the Controller shall keep a record of the persons having such rights. The records include the name and position of the person who has the right of access/restriction, the date of granting the right of access/restriction, the extent of the right of access/restriction, the date of withdrawal of the right of access/restriction. These data will be kept by the Controller for a period of 5 years from the date of revocation of the right of access/restriction.

In order to minimise the intrusion of the Controller into the privacy of the data subjects, the Controller shall keep an official record of all restrictions and accesses to images recorded by the camera, which

shall include the date of the access and/or restriction, the purpose of the restriction/visit and the event giving rise to the restriction/visit and the indication of the further use.

RULES REGARDING THE EXERCISING OF DATA SUBJECT RIGHTS:

the Controller informs you that, pursuant to the GDPR, you may, after having verified your identity, exercise the following rights:

- request information on whether the Controller is processing camera footage of you, i.e. exercise your right of access under Article 15 of the GDPR,
- request the restriction of the processing of your personal data,
- object to the processing,
- request the erasure of your data if one of the conditions set out in Article 17(1) of the GDPR is met,
- object to the processing,

If the data subject requests a copy of the personal data subject to processing pursuant to Article 15(3) of the GDPR from the controller, the controller shall provide it to you, unless that right adversely affects the rights and freedoms of others.

The data subject may exercise their right of restriction under Article 18 of the GDPR within the preservation period of the recording as set out above (three working days). In that case, you must indicate the reason why you do not want the Controller to delete or destroy the recording after the expiry of the preservation period. Pursuant to Article 18 (1) of the GDPR, such reasons may be the following:

- the data subject disputes the accuracy of the personal data.
- the processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use,
- the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims,
- the data subject has objected to the processing in accordance with Article 21(1) of the GDPR, because they consider that the Controller or a third party should not have restricted his or her privacy on the grounds of a legitimate interest.

Time limit for storing restricted recordings

- if the data subject contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow the controller to verify the accuracy of the personal data,
- if the data subject has objected to the processing pursuant to Article 21(1) of the GDPR because they consider that the controller or a third party should not have restricted their privacy on the grounds of a legitimate interest, in which case the restriction shall apply for the period until it is established whether the legitimate grounds of the controller prevail over the legitimate grounds of the data subject.
- if the data subject considers that the processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use, or where the data subject considers that the controller no longer needs the personal data for the purposes of the processing but the data subject requires them for the establishment, exercise or defence of legal claims, the restricted records shall be kept by the controller until:
 - o if the data subject requests a copy of the restricted recording pursuant to Article 15(3) of the GDPR and provides that to the controller, until the copy is provided,
 - o the authority contacts the Controller in the course of the official procedure and provides the restricted recording to the Controller, it shall retain the recording until it is provided to the authority, if neither of the two conditions are met, at the latest by the end of the general limitation period pursuant to Section 6:22(1) of Act V of 2013 on the Civil Code, i.e. for 5 years.

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Where requests from a Data Subject are clearly unfounded or excessive, SEFAG Zrt. may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or may refuse to take action in relation to the request.

The Controller endeavours to ensure that the information provided to you is as concise, transparent, comprehensible, easily accessible, clear and understandable as possible, in all cases, while complying with the rules set out in the GDPR.

You may submit your request, primarily in writing, to our Data Protection Officer at the contact details set out in this notice. However, if you request information verbally, an authorised employee of the Controller may, after verifying your identity, provide you with the information verbally, provided that the necessary data are available to them. In all other cases, your request will be recorded by our staff and you will be informed of your request within one month of its receipt. This deadline may be extended by a maximum of two additional months if justified by the complexity of the request or the number of requests currently being processed, but you will be informed electronically within one month of the receipt of your request.

If we do not act on your request or if you do not accept our action, you may seek legal remedy. You may lodge a complaint about our processing practices with the National Authority for Data Protection and Freedom of Information or you may turn to the competent court according to your home address or place of residence.

Contact details of the National Authority for Data Protection and Freedom of Information.

Address: 1055 Budapest, Falk Miksa u. 9-11

Postal address: 1363 Budapest, PO Box: 9.

Customer service by phone: +36 (30) 683-5969 and +36 (30) 549-6838

You can find information regarding the submission of requests here: <https://www.naih.hu>