

INFORMATION ON DATA PROCESSING AFFECTING OUR GUESTS

The **Kastélyszálló Kft** (seat: 1033 Budapest, Polgár utca 8-10. ; "**Company**"), as the **operator of the Fenyőharaszt Castle Hotel**, informs you about the processing of your personal data in connection with the processing of your personal data in accordance with the provisions of this notice in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016. on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) ("GDPR") as set out in Article 13 or, if we receive your personal data from our employing partner, Article 14 thereof.

1. Legal basis for data processing:

Pursuant to Article 6(1)(b) of the GDPR, the processing of personal data is lawful only if and to the extent that the processing is necessary for the performance of a contract to which the data subject is party or for taking steps at the request of the data subject prior to entering into a contract.

Pursuant to Article 6(1)(c) GDPR, the processing of personal data is lawful only if and to the extent that the processing is necessary for compliance with a legal obligation to which the controller is subject.

Pursuant to Article 6(1)(f) GDPR, the processing of personal data is lawful only if and to the extent that processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

2. The data controller shall:

The controller of your personal data as defined above (data controller): the Company.

3. Purpose of data processing and scope of processed data:

Art. 5 para. 1 lit. a GDPR

'Personal data

...

(b) collected for specified, explicit and legitimate purposes and not processed in a manner incompatible with those purposes;... ('purpose limitation');

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

..."

The purpose of processing your data specified in section 1 above is for the Company to be able to perform the contract concluded with you or your employer or to enforce your rights in connection with it.

If you request an offer/book a room from the Company, the Company processes the following data about you pursuant to Article 6 (1) (b) and (c) of the GDPR:

Personal data	Purpose of data processing
Name (first and last name), address, id card number, vehicle registration number	It is necessary for contacting, requesting an offer, booking a room and issuing a regular invoice.
E-mail address	Contacts.

Telephone number	Keeping in touch, more efficient coordination of issues related to room reservation, request for quotation, billing.
Billing name and address	Issuing a regular invoice, as well as creating the contract, defining its content, modifying it, monitoring its performance, invoicing the resulting fees, and enforcing the claims related to it.
Booking details (date and time, time of arrival, time of departure, number of adults, number of children, age of children, type of board, room type)	To enable you to book a room and request a quote.
Date of booking/request for quotation	Performing a technical operation.
IP address at the time of booking/enquiry	Performing a technical operation.

If you do not provide the above data, the Company will not be able to fulfill the contract and its legal obligations related to it, so the parties will not be able to conclude a contract.

4. Range of data subjects: All data subjects booking/requesting an offer on the website.

5. Duration of data processing:

After providing a response to your request for quotation, the data will be deleted immediately (in this case, the Company is no longer entitled to send newsletters) if you have not booked a room. If the reservation took place in the Company's system, a contract was concluded with it, so the deadline for deleting personal data is different in the case of accounting documents, since according to Section 169 (2) of Act C of 2000 on Accounting, these data must be kept for 8 years. The accounting documents (including general ledger accounts, analytical or detailed records) which directly and indirectly support the accounting accounts shall be kept in a legible form for at least 8 years, retrievable by reference to the accounting records. The IP address of the data subject will be deleted after the data subject's objection and the request for deletion.

6. Description of the technical and organisational measures used to store the data and ensure the security of the data

Your personal data is stored on the Company's servers located at its branch (2174 Verseg, Fenyőharaszt) in a controlled and closed location.

The Company will take all reasonable technical precautions to ensure the secure and non-access storage of the stored data by third parties.

IT security description of the storage of personal data, technical and organizational measures taken to ensure data security:

The Company ensures the security of personal data by, among other things, recording the operation of its IT system in regulations, providing its IT system with a continuously maintained firewall, protection with anti-virus and spam filtering, protecting its electronic devices with a password, and providing access to certain personal data only to those employees or data processors who need it to perform the given activity.

7. Persons with access to the data, data transfers:

The personal data specified in section 3 above are accessed by the managing director of the Company, its accountant and employees who act on behalf of the Company in connection with the performance of the contract. The data can be accessed by legal entities providing IT background services to the Company, as well as by the municipal tax authority. The data will not be transferred outside the EEA (Hungary).

8. Your rights in relation to data processing (data subject's rights):

In connection with the processing of your personal data, you have the following rights:

a) **right of access (Art. 15 GDPR):** You have the right to obtain from the Company information as to whether or not personal data concerning you are being processed, and, if that is the case, access to the personal data and the information contained in this notice.

The Company shall provide you with a copy of the personal data undergoing data processing upon request. For any additional copies requested by you, the Company may charge a reasonable fee based on administrative costs. If you have submitted your request electronically, the information will be provided in a commonly used electronic format, unless you request otherwise.

b) **right to rectification (Art. 16 GDPR):** You have the right to obtain from the Company the rectification of inaccurate personal data concerning you. You also have the right to request that incomplete personal data be completed.

c) **right to erasure (Art. 17 GDPR):** You have the right to obtain from the Company the erasure of personal data concerning you and the Company is obliged to erase personal data concerning you if one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you object to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the Company is subject. The above provisions pursuant to this point (c) shall not apply to the extent that (i) it is necessary for compliance with an obligation under Union or Member State law to which the Company is subject which requires processing, or (ii) the processing is necessary for the establishment, exercise or defence of legal claims.

d) **right to restriction of processing (Art. 18 GDPR):** You have the right to obtain from the Company restriction of processing if one of the following applies:

- you dispute the accuracy of the personal data, in which case the restriction applies to the period that allows the Company to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- the Company no longer needs the personal data for the purposes of data processing, but you require them for the establishment, exercise or defence of legal claims; or
- you have objected to the processing; in this case, the restriction applies to the period until it is determined whether the legitimate reasons of the Company take precedence over your legitimate reasons.

e) **right to object (Art. 21 GDPR):** You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data, insofar as the processing is necessary for the purposes of the legitimate interests of the Company or a third party. In this case, the Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Considering that the data processing under this

information is carried out in order to fulfill a contractual obligation, a legal obligation or to enforce a legitimate interest, the exercise of the right to object does not result in the termination of the data processing under this policy.

f) the **right to information about the above rights (Art. 12 GDPR)**: the Company informs you of the circumstances related to the processing in a concise, transparent, intelligible and clear manner within one month of receipt of your request pursuant to points (a) to (e) above. If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. The Company will inform you of the extension of the deadline, indicating the reasons for the delay, within one month from the date of receipt of the request.

The information is free of charge. If your request is manifestly unfounded or excessive, in particular because of its repetitive nature, the Company, taking into account the administrative costs of providing the requested information or communication or taking the action requested, may: (i) charge a reasonable fee or (ii) refuse to act on the request.

The Company shall inform all recipients to whom the personal data have been disclosed of the provisions of points (b) to (d) above (i.e. any rectification, erasure or restriction of processing), unless this proves impossible or involves a disproportionate effort. The Company will inform you of these recipients at your request.

g) right to lodge a complaint (**Art. 77 GDPR**): You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data concerning you infringes the GDPR. The complaint can be made to the National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Erzsébet Szilágyi tree line 22/C.; telephone: +36 1 391 1400; fax: +36 1 391 1410; www.naih.hu; ugyfelszolgalat@naih.hu).

h) right to **go to court (Art. 79 GDPR)**: You have the right to a judicial remedy if you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in non-compliance with the GDPR. Proceedings against the Company shall be brought before the courts of the Member State in which the Company has its place of business. Such proceedings may also be brought before the courts of the Member State in which you have your habitual residence.

9. You may request information about the processing of your personal data in the following ways and from a person:

The right to information can be exercised in writing via the following contact details:

by mail: 1033 Budapest, Polgár utca 8-10.

Email: fenyoharaszt@bif.hu

Information may also be provided orally to the data subject at his or her request after verifying his or her identity (phone: [+3620/442-21-42](tel:+36204422142)). We would like to inform our clients that if our employees have doubts about the identity of the data subject, we may ask you to provide the information necessary to confirm the identity of the data subject

Budapest, 30 November 2018

Castle Hotel Ltd.