

## **INFORMATION ON DATA PROCESSING CARRIED OUT ON THE BASIS OF ACT CLV OF 1997 ON CONSUMER PROTECTION**

The **Kastélyszálló Kft** (seat: 1033 Budapest, Polgár u. 8-10. ; "**Company**") 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").

### **1. Legal basis for data processing and scope of data processed:**

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. In accordance with the Consumer Protection Act, the Company is obliged to investigate the consumer complaint.

Accordingly, the Company processes the following personal data in connection with the handling of the complaint:

consumer's name; consumer's home address; the information contained in the complaint (the minutes thereof); place, time and method of lodging a complaint; unique identification number of the complaint; a detailed description of the consumer's complaint; documents, documents and other evidence presented by the consumer; where applicable, signature of the consumer.

### **2. The data controller shall:**

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

### **3. Purpose of data processing:**

The purpose of processing your data specified in section 1 above is to enable the Company to fulfill its obligations under the Consumer Protection Act. The provision of the above data is based on the law, without providing the data, the Company cannot investigate the complaint and fulfill its obligations under the Consumer Protection Act.

### **4. Duration of data processing:**

The company is obliged to keep the report of the complaint and a copy of the response for a period of five years and to present it to the supervisory authorities upon their request (Section 17/A(7) of the Consumer Protection Act).

### **5. Description of the technical and organizational 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. Paper minutes are stored in seclusion.

#### **6. Persons with access to the data, data transfers:**

The personal data specified in section 1 above are accessed by the managing director of the Company.

The Company is obliged to present the data to the supervisory authorities.

The data is not accessed by third parties and is not transferred outside the EEA (Hungary).

#### **7. Your rights in relation to data processing (data subject 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;
- 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.

e) **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 (d) 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.

f) **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](http://www.naih.hu); [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

g) **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.

## **8. 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](mailto: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 for the provision of information necessary to confirm the identity of the data subject.

Budapest, 30 November 2018