

PRIVACY NOTICE

Dear Customer,

When you visit our Company's website, request a quotation, make a room or table reservation, use our sports and recreational services, or send us a message, our Company processes personal data relating to you. Below we provide information on the most important aspects of how we process your personal data and on your related rights. If you have any further questions regarding the processing of your personal data, please feel free to contact us at **hm@gyirmothotel.hu** or using the contact details of our Company listed below.

What is considered personal data?

Personal data means any information relating to an identified or identifiable natural person (data subject). Personal data therefore includes, for example, your name, address, date of birth, the content of messages sent to us, or the details of your order.

Data relating to non-natural persons do not qualify as personal data. Accordingly, data relating to a company, institution, public authority or association (such as a company's name, contact details, or the details of an order placed by a company) do not fall under the concept of personal data. Likewise, data where the data subject cannot be identified, such as anonymized or statistical data, are not considered personal data.

Who processes your personal data?

Name of the Data Controller:

ARUNDO Vendéglátó és Szállásszolgáltató Kft

Registered office:

9019 Győr, Ménfői út 61/A building

Tax number: 32942440-2-08

Company registration number: 08-09-038191

Representative: Júlia Nagy-Keglovich, Managing Director

Telephone: +36 30 876 1009

Person responsible for data protection matters: Júlia Nagy-Keglovich

E-mail: hm@gyirmothotel.hu

(hereinafter referred to as the "Company")

What personal data does the Company process and for what purpose?

Use of hotel services

For the provision of services, the purpose of processing all data relating to you is to ensure the delivery of the service and to maintain contact with you. In certain cases specifically indicated below, the processing of your data is necessary to comply with legal obligations applicable to the Company; in such cases, the legal basis for processing is compliance with a legal obligation.

Where the processing and retention of data are required by law, the Company stores such data for the period specified in the relevant legislation (in particular Act CLVI of 2016 on the State Tasks Related to the Development of Tourism Regions and its implementing decree, as well as tax and accounting legislation), and deletes them after the expiry of this period.

For certain services, you may provide additional information in the “comments” section to help us better understand your needs; however, this is not a condition for room reservations or the use of other services.

Room reservation

In the case of online, in-person (paper-based) or telephone room reservations, the Company may request the following data from you:

- form of address (optional);
- first name;
- last name;
- address (street, city, postal code, country);
- e-mail address;
- telephone number;
- credit/debit card type;
- credit/debit card number;
- name of the credit/debit card holder;
- credit/debit card expiry date;
- credit/debit card CVC/CVV code (known as Card Validation Code (CVC2) for MasterCard and Card Verification Value (CVV2) for Visa).

Check-in

When using hotel services, you are required to check in by providing the data listed below. During check-in, the provided data are recorded via the accommodation management software on storage space provided by a hosting service provider designated by government decree. Check-in is carried out by electronically recording the data and scanning the identity document.

The data recorded at check-in are processed and archived by the Company within the time limits specified above for the purpose of proving the conclusion, performance and fulfillment of the contract, as well as for the enforcement of possible claims.

The following data must be provided by all guests:

- family name and given name;
- family name and given name at birth;
- place and date of birth;
- gender;
- nationality;
- mother's family name and given name at birth;
- identification details of the identity document or travel document;
- address of the accommodation service;
- start date, expected end date and actual end date of the stay.

For third-country nationals, in addition to the above personal identification data, the following data must also be processed by law:

- identification details of the travel document (passport);
- address of the accommodation;
- start and end date of the stay;
- visa or residence permit number;
- date and place of entry.

A third-country national is any person who is not a citizen of a Member State of the European Economic Area (EEA), except Hungarian citizens, including stateless persons. EEA Member States include the Member States of the European Union, Iceland, Liechtenstein, Norway and Switzerland.

Providing the mandatory data and presenting an identity document are conditions for using hotel services. The presentation and scanning of the identity document and the provision of the above data are mandatory for all guests under the law, regardless of age or other factors (such as price, discounts, length of stay, or family relationship with the accommodation provider). If you refuse to provide the above data or present your identity document, the accommodation provider is obliged to refuse the accommodation service pursuant to Section 9/H (2) of the Tourism Act.

Pursuant to legal requirements, the Company is obliged to transmit certain guest data (gender, nationality, date of birth, city and postal code of permanent residence) to the National Tourism Data Supply Centre (NTAK), which extracts anonymized, real-time booking information from these data. Further information on the NTAK database and its data processing practices is available at: <https://info.ntak.hu/adatszolgaltatas>.

Data transfer to the Guest Information Closed Database (VIZA) system

Act CLVI of 2016 obliges accommodation providers to record certain data of guests using accommodation services on storage space provided by a hosting service provider designated

by the Government for statutory purposes. The designated hosting service provider is the Hungarian Tourism Agency (MTÜ), and the storage tasks are performed via the Guest Information Closed Database (VIZA) system.

In relation to data recording and transfer to the VIZA system, the accommodation provider acts as the data controller, while the Hungarian Tourism Agency acts as the data processor.

Data processor:

Hungarian Tourism Agency Zrt.

Company registration number: 01-10-041364

Tax number: 10356113-4-41

Address: 1027 Budapest, Kacsá u. 15–23.

Mailing address: 1525 Budapest, P.O. Box 97

Central telephone: +36 1 488 8700

Central e-mail: info@mtu.gov.hu

Represented by: Dr. Zoltán Guller, CEO

Data Protection Officer: Levente Papp, privacy@mtu.gov.hu

Further information on the operation of the VIZA system and the processing of your data is available at: <https://vizainfo.hu/vendegek>.

Bank card data

Bank card and bank account data provided during room reservation are used by the Company only to the extent and for the duration necessary to exercise its rights and fulfill its obligations. Such data are processed by the Company's contracted banking partners. Information on this processing is available on the relevant bank's website.

Reservations made via accommodation intermediary websites

If you make a reservation through an accommodation intermediary website (e.g. booking.com, szallas.hu), the operator of that website electronically transfers the data you provided during the reservation to the Company. The scope of transferred data is defined in the privacy policy of the relevant intermediary website.

The Company uses these data exclusively for fulfilling the reservation and contacting you. In this case, data processing is necessary for the conclusion or preparation of a contract with you. Any disputes related to reservations may require the intermediary website to provide additional information to the Company, such as a copy of the booking confirmation. The legal basis for such processing is the Company's legitimate interest.

Processing of restaurant guest data

When using the restaurant services operated by the Company, the following data may be requested for table reservations:

- name;
- contact details (telephone number and/or e-mail address);
- requested reservation time;
- number of guests;
- room number (for hotel guests).

Reservation data are archived to facilitate future reservations. If you object to the archiving of your data, the Company will delete them. Access to these data is limited to employees involved in recording and fulfilling reservations, while archived data are handled exclusively by the restaurant manager.

Processing of wellness and sports service guest data

When using the Company's sports and recreational facilities, the following data may be requested for reservations:

- name;
- contact details (telephone number and/or e-mail address);
- requested reservation time;
- number of participants.

These data may also be archived to facilitate future reservations, unless you object, in which case they will be deleted.

Invoices for services are issued in accordance with applicable law. For invoicing purposes, the Company processes your name, address, and details of the service used.

To prevent future disputes or to prove facts in the event of a legal dispute, personal data not deleted after the failure, performance or termination of a contract are retained for five years in accordance with the general limitation period under Act V of 2013 on the Civil Code.

Data processing on the Company's website

Via the contact form on our website, you may send us messages. All data provided in the form (name, address, contact details and message content) are processed solely for the purpose of responding to your inquiry.

When visiting our website, cookies are used for service improvement and analytics purposes. You are informed of this upon your first visit and may consent to such processing. Cookies are stored on your computer and may be deleted at any time.

The Company also sends newsletters to subscribers about news, information, discounts and promotions. You may unsubscribe at any time free of charge.

Prize draws

The Company may organize prize draws for promotional purposes. Participation requires registration and the provision of the following data:

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

Data are processed for contact purposes until the end of the prize draw and deleted thereafter, except for the winner's data, which are retained in accordance with tax and accounting laws.

CCTV (security camera system)

Cameras operate on the Company's premises for the protection of persons and property. The purpose is property protection, personal safety, crime prevention and investigation. The legal basis is the Company's legitimate interest.

Legal basis for data processing

The Company processes personal data based on:

- contract preparation and performance,
- compliance with legal obligations,
- legitimate interests,
- or the data subject's consent,

in accordance with applicable Hungarian and EU legislation, including the GDPR.

Your rights

You are entitled to:

- access to your personal data,
- rectification,
- erasure,
- restriction of processing,
- objection,
- withdrawal of consent,
- data portability.

You may enforce your rights by contacting the Company's data protection officer at **hm@gyirmothotel.hu**.

You also have the right to lodge a complaint with the **Hungarian National Authority for Data Protection and Freedom of Information (NAIH)**:

- Address: 1055 Budapest, Falk Miksa utca 9–11.
- Postal address: 1363 Budapest, P.O. Box 9
- Phone: +36 (1) 391-1400
- E-mail: ugyfelszolgalat@naih.hu

Detailed data protection rules are available at the Company's registered office and on its official website.

If you have any questions or wish to exercise your data subject rights, please contact **Júlia Nagy-Keglovich, Managing Director**, at **hm@gyirmothotel.hu**.