

# **PRIVACY POLICY ON THE PROCESSING OF DATA RELATED TO ACCOMMODATION SERVICES**

## **TABLE OF CONTENTS**

### **I. GENERAL INFORMATION**

- I.1. Name and Contact Details of the Data Controller
- I.2. Brief Overview of the Privacy Policy

### **II. SPECIFIC DATA PROCESSING ACTIVITIES**

- II.1. Data Processing Related to Information and Offer Requests (Contact)
- II.2. Data Processing Related to Accommodation Reservations
- II.3. Data Processing Related to the Use of Accommodation Services and Check-In (VIZA System, NTAk Data Reporting)
- II.4. Data Processing Related to Invoicing
- II.5. Data Processing Related to Complaint Handling and Use of the Customer Book
- II.6. Data Processing Related to Guestbook Usage
- II.7. Data Processing Related to Satisfaction Surveys (Questionnaires)
- II.8. Data Processing Related to Newsletter Distribution
- II.9. Data Processing Related to Gift Voucher Orders
- II.10. Data Processing Related to Events
- II.11. Data Processing Related to Electronic Surveillance Systems (Cameras)
- II.12. Data Processing Related to Social Media Presence

### **III. DATA SUBJECT RIGHTS AND THEIR EXERCISE**

- III.1. What Rights Do You Have Regarding Data Processing?
- III.2. Where and How Can You Submit a Request to Exercise Your Data Subject Rights?
- III.3. What Happens After a Data Subject Request Is Submitted?
- III.4. What Remedies Are Available Regarding Data Processing?

### **IV. ADDITIONAL INFORMATION ABOUT DATA PROCESSING**

- IV.1. Information Regarding Data Transfers and Data Processors
- IV.2. Confidentiality Obligations and Access Management Rules
- IV.3. Data Security
- IV.4. Data Processing Activities We Do Not Perform

Helen-Dent Kft., as the operator of Hotel Kálvária\*\*\*\* (hereinafter: “Data Controller/Hotel”), informs you about the processing of your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation/GDPR) as follows:

## **I. GENERAL INFORMATION**

### **I.1. Name and Contact Details of the Data Controller**

**Name of the Data Controller:** Helen-Dent Kft. (Hotel Kálvária\*\*\*\*)

**Registered Office of the Data Controller:** 9024 Győr, Kálvária utca 24/A

**Mailing Address of the Data Controller:** H-9024 Győr, Kálvária u. 22/D

**Telephone Number of the Data Controller:** +36 96/510-800

**Email Address of the Data Controller:** info@hotel-kalvaria.hu

### **I.2. Brief Overview of the Privacy Policy**

Guests who are interested in, or make use of, the accommodation services (the data subject, hereinafter: “You” or “Data Subject”) can obtain detailed information about the processing of their personal data from this document.

Information regarding specific data processing activities can be found under **Section II**. Information on the rights of the Data Subject and how to exercise them is provided under **Section III** (“Data Subject Rights and Their Exercise”), while other relevant circumstances of data processing are described in **Section IV** (“Additional Information About Data Processing”).

Rules and procedures regarding the provision and use of accommodation services are governed by applicable tourism sector legislation and other documents issued by the Company, particularly the General Terms and Conditions (GTC). This privacy policy contains information solely relevant to the processing of personal data.

The terms used in this privacy policy correspond to the definitions in data protection legislation, in particular the explanatory definitions of **Article 4 of the GDPR**, and, in certain cases, are supplemented by the interpretive provisions of **Section 3 of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Infotv.)**.

## **II. SPECIFIC DATA PROCESSING ACTIVITIES**

### **II.1. Data Processing Related to Information and Offer Requests (Contacting the Hotel)**

#### **Why does the Data Controller process the Data Subject's personal data?**

To respond to incoming inquiries, provide information about the services, and send a personalized offer in response to a request.

#### **On what basis does the Data Controller process the Data Subject's personal data?**

Personal data is processed based on the Data Subject's consent. (The legal basis for processing is **Article 6(1)(a) of the GDPR**).

If you provide special categories of personal data (e.g., food allergies, sensitivities, or health-related information) to the Data Controller, these will be processed based on your explicit consent (**Article 9(2)(a) of the GDPR**).

#### **What personal data is processed?**

Name, contact details (email address, phone number), information included in the inquiry, and, in the case of an offer request, data related to the requested service, including but not limited to the expected number of guests, age groups, check-in/check-out dates, room type, board type, and any special requirements (e.g., dietary needs).

#### **Who can access the Data Subject's personal data?**

Besides the Data Controller's authorized staff, personal data may be accessed by data processors involved in performing specific tasks or by authorities entitled to access data under the law. Further information on these parties is provided in **Section IV**.

#### **How long does the Data Controller retain personal data for the above purpose?**

If no contract is concluded as a result of the communication, the Data Controller will retain the data until the communication is concluded. If a contract is concluded as a result of the communication, the data will be retained together with the contract, in accordance with the applicable rules.

### **II.2. Data Processing Related to Accommodation Reservations**

#### **Why does the Data Controller process the Data Subject's personal data?**

To receive, process, and manage accommodation reservations and to maintain contact with the Data Subject.

#### **On what basis does the Data Controller process the Data Subject's personal data?**

Processing is necessary to take steps at the request of the Data Subject prior to entering into a contract (**Article 6(1)(b) of the GDPR**).

If you provide special categories of personal data (e.g., food allergies, sensitivities, or health-related information) to the Data Controller, these will be processed based on your explicit consent (**Article 9(2)(a) of the GDPR**).

Please note that if data necessary for completing the reservation is not provided, the Data Controller will be unable to accept the reservation.

#### **What personal data is processed?**

Name of the person making the reservation, email address, phone number, expected number of guests and age groups (adult/child, and age of children), check-in and check-out dates, room and board type (if selectable), and any special requests (e.g., dietary requirements).

Please note that when reservations are made by phone or email, the reservation details are recorded in our electronic system. Calls are **not** recorded.

#### **Where did the Data Controller obtain your personal data? (Source of personal data)**

If the reservation was made through intermediaries (e.g., Booking.com, Szallas.hu, etc.), the data was provided to the Data Controller by the intermediary service providers.

Please note that the Hotel does **not** assume responsibility for the data processing conducted by intermediary service providers. For information on how your data is processed by the intermediary, please consult the relevant intermediary's website.

#### **Who can access the Data Subject's personal data?**

Besides the Data Controller's authorized staff, personal data may be accessed by data processors involved in performing specific tasks or by authorities entitled to access data under the law. Further information on these parties is provided in **Section IV**.

#### **How long does the Data Controller retain personal data for the above purpose?**

If a reservation is canceled without legal consequences or no contract is concluded, the data will be deleted.

If a contract is concluded, the data will be retained together with the contract in accordance with applicable rules.

### **II.3. Data Processing Related to the Use of Accommodation Services and Check-in Procedures (VIZA System, NTAK Data Reporting)**

#### **General description of the data processing**

Under the provisions of Act CLVI of 2016 on the state tasks related to the development of tourism regions (hereinafter: Tourism Act), accommodation providers are required to read the data on the guest's photo ID or other official identification document, as specified by law, at the time of arrival. This data is read using a document reader and transmitted via the accommodation management software to the Guest Information Closed Database (hereinafter: VIZA), provided by the Hungarian Tourism Agency as the data repository. Data transmission is carried out through the software's secure, encrypted module using a safe interface.

Encrypted data stored in the VIZA system can only be accessed for searches by the police via IT tools. The operator of the VIZA system does **not** have access to the stored data.

Regarding the reporting of data to the National Tourism Data Reporting Centre (NTAK), the law requires accommodation providers to provide only statistical data. Therefore, no personal data of the guest is transmitted to this system. The VIZA system is separate from NTAK.

Beyond these legal obligations, the Hotel also processes your personal data in its own systems (both paper-based and via accommodation management software) for the purpose of providing accommodation services.

### **Why does the Data Controller process the Data Subject's personal data?**

To conclude and perform a contract for the provision of accommodation services and for purposes defined in Section 9/H of the Tourism Act.

### **On what basis does the Data Controller process the Data Subject's personal data?**

- For matters defined in the Tourism Act, processing is necessary to comply with a legal obligation (**Article 6(1)(c) GDPR**).
- Beyond what is required by the Tourism Act, processing is necessary for the performance of the contract (**Article 6(1)(b) GDPR**).

If you provide special categories of personal data (e.g., food allergies, sensitivities, or health-related information), these will be processed based on your explicit consent (**Article 9(2)(a) GDPR**).

Please note that if you fail to provide the data required by the Tourism Act or do not present the identification documents specified by law at check-in, the accommodation provider is obliged to refuse the provision of the service.

### **What personal data is processed?**

*Mandatory data under the Tourism Act:*

- Family and given names, place and date of birth, gender, nationality, and mother's maiden name of the guest
- Identification details of the guest's official ID or travel document; for third-country nationals, the visa or residence permit number, and the date and place of entry
- Address of the accommodation, start and expected as well as actual end dates of the stay

*Other data relevant to the provision of accommodation services:*

- Contact information (email address, phone number)

- Other data generated or related to the use of the service (use of additional services, vehicle registration number for parking)
- Data related to food allergies, sensitivities, or health conditions

Please note that neither the accommodation management software nor the VIZA system stores images of the scanned identification documents.

#### **Who can access the Data Subject's personal data?**

In addition to the Data Controller's authorized staff, data may be accessed by data processors involved in specific tasks or by authorities authorized by law. Further information on these parties is provided above and in **Section IV**.

#### **How long does the Data Controller retain personal data for the above purpose?**

- According to the Tourism Act, the Data Controller retains the data in the repository system until the last day of the first year following the date of acquisition.
- Data processed on the basis of a contractual legal ground in connection with the provision of accommodation services is retained in the Data Controller's own systems for the duration of the civil law limitation period (**5 years**).

### **II.4. Data Processing Related to Invoicing**

#### **Why does the Data Controller process the Data Subject's personal data?**

For the purpose of issuing and retaining invoices and complying with accounting obligations.

#### **On what basis does the Data Controller process the Data Subject's personal data?**

The processing is necessary to comply with a legal obligation applicable to the Data Controller (**Article 6(1)(c) GDPR**).

Relevant national legislation:

- Act CXXVII of 2007 on Value Added Tax (hereinafter: VAT Act), Sections 159(1) and 169
- Act C of 2000 on Accounting (hereinafter: Accounting Act), Section 169(2)

Providing personal data is legally required, and therefore the Data Subject is obliged to provide personal data necessary for the issuance of the invoice.

#### **What personal data is processed?**

- Name
- Billing address
- Tax identification number (for sole proprietors)

**Who can access the Data Subject's personal data?**

In addition to the Data Controller's authorized staff, data may be accessed by data processors involved in specific tasks or by authorities authorized by law. Further information on these parties is provided in **Section IV**.

**How long does the Data Controller retain personal data for the above purpose?**

Invoices are retained for at least **8 years** following the termination of the contract, in accordance with the provisions of the Accounting Act.

**II.5. Data Processing Related to Complaint Management and the Use of the Customer Book****Why does the Data Controller process the Data Subject's personal data?**

For the purpose of investigating and handling complaints.

**On what basis does the Data Controller process the Data Subject's personal data?**

The processing is necessary to comply with a legal obligation applicable to the Data Controller (**Article 6(1)(c) GDPR**).

Relevant national legislation:

- Act CLV of 1997 on Consumer Protection (hereinafter: Consumer Protection Act)
- Act CLXIV of 2005 on Trade

Providing personal data is legally required; therefore, without providing the required data, the Data Subject cannot exercise their consumer rights.

**What personal data is processed?**

*For complaints (as recorded in the protocol under Section 17/A (5) of the Consumer Protection Act):*

- Name and address of the complainant
- Place, date, and method of submitting the complaint
- Detailed description of the complaint
- Documents and evidence presented
- Statement of the service provider (if relevant)
- Signatures of the complainant and the person recording the protocol
- Place and date of recording the protocol
- In the case of complaints submitted via phone or other electronic communications, the unique identification number of the complaint

*For the Customer Book:*

- Name, address, and e-mail address of the service user (phone number if provided)
- Content and date of the entry

Please note that no voice recording is made for complaints submitted by phone.

#### **Who can access the Data Subject's personal data?**

In addition to the Data Controller's authorized staff, data may be accessed by data processors involved in specific tasks or by authorities authorized by law. Further information on these parties is provided in **Section IV**.

#### **How long does the Data Controller retain personal data for the above purpose?**

- Copies of the protocol and responses to complaints are retained for **3 years** in accordance with the Consumer Protection Act.
- Entries in the Customer Book and copies of written responses to customer complaints are retained for **3 years** in accordance with Government Decree 210/2009 (IX. 29.) on the conditions for conducting commercial activities.

## **II.6. Data Processing Related to the Use of the Guestbook**

#### **Why does the Data Controller process the Data Subject's personal data?**

To publicly share guests' personal opinions and experiences regarding the service through written entries in a paper-based or online guestbook.

#### **On what basis does the Data Controller process the Data Subject's personal data?**

Personal data is processed based on the Data Subject's consent (**Article 6(1)(a) GDPR**). By submitting an entry, the Data Subject is considered to have given consent.

#### **What personal data is processed?**

- For a paper-based guestbook, only the personal data provided in the entry are processed. Entries can be made without including personal data.
- For the online guestbook on the website, the Data Controller processes the Data Subject's name, e-mail address, and message. Publicly, only the first letter of the surname, first name, the content of the message, and the date of the entry are displayed on the website. The full name and e-mail address are accessible only to the Data Controller.

The Data Controller reserves the right to moderate offensive or otherwise objectionable entries.

#### **Who can access the Data Subject's personal data?**

- Paper guestbook: accessible in the Hotel only.
- Online guestbook: entries are publicly accessible and viewable by anyone.

**How long does the Data Controller retain personal data for the above purpose?**

Data accessible to guests are retained until the guestbook is full, after which the entries are archived for historical preservation purposes.

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## **II.7. Data Processing Related to Satisfaction Surveys (Questionnaire)**

**Why does the Data Controller process the Data Subject's personal data?**

To continuously monitor the quality of services based on guest feedback and to take appropriate measures as indicated by the feedback.

**On what basis does the Data Controller process the Data Subject's personal data?**

Personal data is processed based on the Data Controller's legitimate interest (**Article 6(1)(f) GDPR**).

The Data Controller has a legitimate interest in continuously monitoring the quality of its services and guest satisfaction, which contributes to maintaining high-quality services and optimal guest traffic.

**What personal data is processed?**

Guest name, e-mail address, room number, date, and signature.

**Who can access the Data Subject's personal data?**

In addition to the Data Controller's authorized staff, data may be accessed by data processors involved in specific tasks or by authorities authorized by law. Further information on these parties is provided in **Section IV**.

**How long does the Data Controller retain personal data for the above purpose?**

The questionnaire data are retained by the Data Controller for **1 year**.

## **II.8. Data Processing Related to Newsletter Subscription**

**Short description of the processing**

Subscription to the newsletter is completely voluntary, entirely independent of other services, and can be revoked at any time without justification. Unsubscribing can be done either via the unsubscribe link in the newsletter or by sending an unsubscribe request to **info@hotel-kalvaria.hu**.

**Why does the Data Controller process the Data Subject's personal data?**

For the purpose of sending newsletters to subscribers. The newsletters provide information about the Hotel's services, current promotions, and the latest news related to the service.

**On what basis does the Data Controller process the Data Subject's personal data?**

Personal data is processed based on the Data Subject's consent (**Article 6(1)(a) GDPR**).

**What personal data is processed?**

Name, e-mail address, data related to giving or withdrawing consent (date, statement).

**Who can access the Data Subject's personal data?**

Besides the Data Controller's authorized staff, data may be accessed by data processors involved in specific tasks or authorities authorized by law, further information on which is provided in **Section IV**.

**How long does the Data Controller retain personal data for this purpose?**

Data is retained until the newsletter service is discontinued or until the Data Subject withdraws consent.

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**II.9. Data Processing Related to Gift Voucher Orders****Why does the Data Controller process the Data Subject's personal data?**

To process gift voucher orders upon request, including order receipt, processing, sending the gift card, and issuing the invoice.

**On what basis does the Data Controller process the Data Subject's personal data?**

Personal data is processed as necessary for the performance of a contract (**Article 6(1)(b) GDPR**). Without the provision of data, the order cannot be processed, and the service cannot be provided.

**What personal data is processed?**

Name, postal address, e-mail address, phone number of the purchaser; details of the gift voucher; if personalized, the name of the beneficiary. Data required for invoicing are as described above.

**Who can access the Data Subject's personal data?**

In addition to the Data Controller's authorized staff, data may be accessed by data processors involved in specific tasks or authorities authorized by law (see **Section IV** for details).

**How long does the Data Controller retain personal data for this purpose?**

Data related to the order and purchase are retained for the duration of the civil law statute of limitations (**5 years**) from the contract date.

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**II.10. Data Processing Related to Events****Why does the Data Controller process the Data Subject's personal data?**

To respond to inquiries regarding event organization, to perform the contract in case it is concluded, and for communication purposes.

**On what basis does the Data Controller process the Data Subject's personal data?**

- Personal data are processed as necessary for the performance of a contract (**Article 6(1)(b) GDPR**).
- If the customer is a legal entity, the processing of personal data of contact persons or participants involved in the event is based on the Data Controller's legitimate interest (**Article 6(1)(f) GDPR**).

#### **What personal data is processed?**

Name, e-mail address, and phone number of the customer; data necessary for providing the venue and for organizing the event (e.g., contact details of other participating partners). Data required for invoicing are as described above.

#### **Who can access the Data Subject's personal data?**

In addition to the Data Controller's authorized staff, data may be accessed by data processors involved in specific tasks or authorities authorized by law (see **Section IV** for details).

#### **How long does the Data Controller retain personal data for this purpose?**

Contract-related data are retained for the duration of the civil law statute of limitations (**5 years**) from the contract date.

### **II.11. Data Processing Related to the Use of Electronic Surveillance Systems (Cameras)**

#### **Short description of the processing**

The Hotel operates an electronic surveillance system on its premises to ensure the safety of guests, employees, and other individuals present, to guarantee the smooth provision of services, and to protect the Hotel's property. The surveillance system records and stores footage on the Hotel's own server in a segregated manner. The system also allows live monitoring by authorized personnel (e.g., reception staff, hotel manager).

Cameras do not record audio.

The Hotel does not place cameras in locations where observation would violate human dignity, such as restrooms or changing rooms.

Access to, viewing, or use of camera footage is permitted exclusively for authorized personnel in a controlled and documented manner.

#### **Why does the Data Controller process the Data Subject's personal data?**

To ensure the safety of guests, employees, and other individuals on the premises, to guarantee uninterrupted service, to protect the property of the Hotel and individuals on the monitored premises, and for occupational and accident safety purposes (accident prevention and investigation).

#### **On what basis does the Data Controller process the Data Subject's personal data?**

Personal data is processed based on the legitimate interest of the Data Controller (**Article 6(1)(f) GDPR**).

The Hotel has a legitimate interest in protecting its property and ensuring the personal and

property safety of individuals on its premises using lawful and appropriate means, thereby supporting the uninterrupted provision of services.

**What personal data is processed?**

Images of individuals entering or present on the monitored premises, and other data obtainable from the camera footage (e.g., location, duration of presence).

**Who can access the Data Subject's personal data?**

Besides the Data Controller's authorized staff, data may be accessed by data processors involved in specific tasks or authorities authorized by law (see **Section IV** for further information).

**How long does the Data Controller retain personal data for this purpose?**

Camera footage is retained for three weeks from the date of recording.

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**II.12. Data Processing Related to Social Media Presence**

**Short description of the processing**

The Hotel is active on several social media platforms (Facebook/Messenger, Instagram), sharing content related to the Hotel, including promotions, advertisements, and information about associated programs.

If you share your opinion or send messages publicly, the content and your profile will be visible to anyone.

Private messages and other activities on these platforms are visible to our staff with administrative privileges managing the accounts.

The Hotel acts as a joint data controller together with the platform operators. The Hotel does not process account identifiers related to user profiles. Meta Platforms Ireland Limited's data protection rules for Facebook/Messenger/Instagram can be accessed here: [Meta Data Policy – How Meta Collects and Uses Your Data | Privacy Center | Manage Your Privacy on Facebook, Instagram, and Messenger | Facebook Privacy](#).

**Why does the Data Controller process the Data Subject's personal data?**

For communication with, and information provision to, the Data Subject.

**On what basis does the Data Controller process the Data Subject's personal data?**

Personal data is processed based on the Data Subject's consent (**Article 6(1)(a) GDPR**).

**What personal data is processed?**

Publicly available data from the user profile and content of messages.

**Who can access the Data Subject's personal data?**

- Public posts or messages can be seen by anyone using the respective social media service.
- Private messages can be accessed by authorized staff of the Data Controller and the social media platform provider, as well as by data processors involved in specific tasks or authorities authorized by law (see **Section IV**).

### **How long does the Data Controller retain personal data for this purpose?**

Until the Data Subject withdraws consent or as long as the post remains relevant and current.

## **III. DATA SUBJECT RIGHTS AND THE EXERCISE THEREOF**

### **III.1. What rights do you have in relation to data processing?**

The rights you, as the Data Subject, are entitled to in relation to the processing of your personal data depend on the legal basis of the processing. Therefore, you may be entitled to exercise different rights for different processing activities. Information on the legal basis of each processing activity can be found under the heading **“Specific Data Processing”** in the section titled **“On what basis do we process your personal data?”**.

The rights listed below indicate for which legal bases they can be exercised.

To exercise your rights, the Data Controller needs to identify you as the Data Subject. Exercising Data Subject rights can only occur after your identity has been verified.

#### **Data Subject Rights:**

- **Right of access:** You may request information on whether the Data Controller processes your personal data and request specific information regarding this processing. / Applicable for all legal bases.
- **Right to rectification:** You may request the correction or completion of your personal data if the data processed by the Data Controller is inaccurate or incomplete. / Applicable for all legal bases.
- **Right to withdraw consent:** You may withdraw your consent to data processing at any time without giving reasons. / Applicable when the legal basis is **GDPR Article 6(1)(a)**.

Upon withdrawal of consent, if there is no other legal basis for processing, the Data Controller will delete your data. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

- **Right to erasure (“right to be forgotten”):** You may request the deletion of your personal data if the purpose of processing no longer exists, if you believe the processing is unlawful, if you have successfully objected to processing, or if you have withdrawn consent. / Applicable for all legal bases.

- **Right to restriction of processing:** You may request that processing be limited to storage only if the accuracy of the data needs to be verified, if the data would otherwise need to be erased, or if you require the data for the establishment, exercise, or defense of legal claims. / Applicable for all legal bases.
- **Right to object:** You may object to the processing of your personal data if you believe your rights override the legitimate interests of the Data Controller. / Applicable when the legal basis is **GDPR Article 6(1)(f)**.
- **Right to data portability:** You may request the transfer of your personal data to another data controller if the processing is based on **GDPR Article 6(1)(a) or (b)** and processing is carried out in an automated manner.

Detailed information about these rights can be found in **Articles 15–21 of the GDPR** and in the Data Controller’s **Data Protection Policy**, which will be provided to you in full upon request regarding the exercise of your rights.

### **III.2. Where and how can you submit a request to exercise your Data Subject rights?**

You may submit a request to exercise your Data Subject rights primarily in writing (as a private document with full probative force) by post or electronically by e-mail to the Data Controller, using the contact details provided in Section I.1.

The Data Controller will only consider a request sent by e-mail as coming from you if it is sent from an e-mail address previously provided to and registered with the Data Controller. If the request is sent from a different e-mail address, the Data Controller may require verification of your identity.

You may also submit an oral request to the reception staff or the hotel manager, who will record the request and, if necessary, forward it to the responsible staff for action.

Your request must indicate which data processing activity your rights relate to and provide sufficient personal data to unequivocally identify you as the Data Subject. Please, if possible, provide personal data that the Data Controller already processes about you, so that your identity can be verified by comparing the provided data with the data held by the Data Controller. If there is reasonable doubt regarding your identity, the Data Controller may request additional information from you for the purpose of comparison with the data we process about you.

If the nature of the request allows, the Data Controller may provide information orally, provided your identity is verified beyond doubt.

If you are acting on behalf of another person, the request will only be accepted if the acting person has the appropriate authorization to act on behalf of the Data Subject.

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### **III.3. What happens after you submit your request?**

Regarding your request, unless an extension is justified, the Data Controller will provide information no later than **one month** from the receipt of the request.

This period may be extended by a further **two months** if the complexity of the request or the number of requests being processed justifies it. In such a case, you will be informed of the extension within **one month** of receipt of the request.

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### **III.4. What remedies are available in relation to data processing?**

It is in our mutual interest that your personal data is processed in accordance with the legal requirements. While fully respecting your rights to remedies, we recommend that you first contact us regarding any questions or complaints concerning your personal data, using the contact details provided in Section I.1.

You may lodge a complaint regarding the Data Controller's processing activities with the **National Authority for Data Protection and Freedom of Information (NAIH)**, or, alternatively, seek judicial remedy at the competent court according to your place of residence or habitual residence.

#### **NAIH contact details:**

- Address: 1055 Budapest, Falk Miksa u. 9-11., Hungary
- Mailing address: 1363 Budapest, Pf. 9.
- Telephone: +36 (1) 391-1400
- For information on how to submit a request, please visit the NAIH website: [www.naih.hu](http://www.naih.hu)

## **IV. WHAT ELSE YOU NEED TO KNOW ABOUT DATA PROCESSING**

### **IV.1. Information on data transfers and data processors**

For certain data processing activities, we engage data processors. A data processor may only process the personal data of the Data Subject for the purpose defined and contractually agreed upon by the Data Controller, on behalf of and under the instructions of the Data Controller.

As a Data Controller, we only work with data processors that provide sufficient guarantees to comply with the data protection and data security requirements set out in data protection legislation. Each data processor is bound by confidentiality obligations and contractual guarantees regarding the personal data they access in the course of their duties.

## **Our data processors:**

- 1. Data storage service provider for the mandatory VIZA system under the Tourism Act:**
  - Name: Hungarian Tourism Agency Zrt.
  - Registered Office: 1027 Budapest, Kacska Street 15-23, Hungary
- 2. Organization responsible for IT infrastructure management:**
  - Name: Flórián Béla e.v.
  - Registered Office: 9172 Győrzámoly, Akác út 32, Hungary
- 3. E-mail hosting service provider:**
  - Name: IRQ Hungary Zrt.
  - Registered Office: 9022 Győr, Batthyány Square 7, Hungary
- 4. Organization performing accounting-related tasks:**
  - Name: Lengyel és Wágner Könyvvizsgáló Iroda Kft.
  - Registered Office: 9021 Győr, Árpád Street 21, Hungary
- 5. Hotel software provider and support partner:**
  - Name: Previo.hu Kft.
  - Registered Office: 1119 Budapest, Petzvál József Street 4/A, Hungary
- 6. Billing-related partner:**
  - Name: Szamlazz.hu – KBOSS.hu Kft.
  - Registered Office: 1031 Budapest, Záhony Street 7, Hungary
- 7. Online marketing partner (social media management):**
  - Name: OpenOnline Kft.
  - Registered Office: 9231 Máriakálnok, Orgona Street 31, Hungary
- 8. Website hosting service provider (contractual partner)**
- 9. Newsletter service provider (contractual partner)**

Beyond the data transfers explicitly mentioned in this Privacy Notice and the transfers to the above data processors, public authorities (courts, authorities) may access personal data processed by the Company within their investigation or inspection activities, in accordance with EU or national law.

Therefore, if there is a legal obligation to transfer personal data or to provide access to them (e.g., pursuant to a court or authority order), the Data Controller is obliged to comply.

#### **IV.2. Confidentiality obligations and access management rules**

- All persons acting on behalf of the Data Controller in relation to the processing of personal data are bound by data protection and confidentiality obligations.
  - The Data Controller ensures that persons acting under its direction and having access to personal data may process such data exclusively in accordance with the Controller's instructions and applicable legal requirements.
  - The Data Controller ensures that personal data, whether processed electronically or on paper, can only be accessed by persons with appropriate access rights, and only to the extent necessary for the performance of their tasks.
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#### **IV.3. Data security**

The Data Controller takes appropriate technical and organizational measures, considering the state of technology and the risks involved, and enforces internal regulations—especially the Data Protection Policy—to ensure the security of personal data.

These measures protect personal data against unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as accidental loss or damage.

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#### **IV.4. Data processing operations not performed**

For none of the purposes of data processing described in this Privacy Notice are the following operations carried out:

- Transfer of personal data to third countries or international organizations,
  - Automated decision-making.
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**This Privacy Notice supersedes the previous Data Processing Statement that has been in effect since 25 May 2018 and amended on 1 June 2019.**

Győr, 2025