



DATA MANAGEMENT INFORMATION

LAKESIDE LUXURY APARTMENT IN SARVAR

Data Controller:

Julia Herczeg

29 August 2024.

TABLE OF CONTENTS

1. Introduction
2. The Data Controller and its contact details, accommodation facilities operated by the Data Controller
3. Data management
 - 3.1. Contacting, contacting, requesting a quote
 - 3.2. Booking
 - 3.3. Community site and accommodation portal
 - 3.4. Electronic guest register application / COMPANY accommodation management software
 - 3.5. National Tourist Information Centre (NTAK)
 - 3.6. Guest Information Closed Database (VIZA)
 - 3.7. Electronic guest data registration (Excel spreadsheet)
 - 3.8. Possible consequences of non-disclosure
 - 3.9. Persons entitled to access the data
4. Identity of recipients/processors of personal data
5. Data security measures
6. Rights of data subjects
7. Remedies available
8. Rules concerning requests sent by the data subject to the controller
9. Procedure in the event of a data breach
10. Acceptance and amendment of the privacy notice
11. Data Protection Officer
12. Rules for data processing
13. Principles governing the processing of personal data
14. Legal basis for processing
15. Main legislation and abbreviations relating to data processing

1. INTRODUCTION

- 1.1. **JÚLIA HERCZEG**, a private individual with a tax number (hereinafter referred to as the "**Data Controller**" or "**Accommodation Provider**"), fulfils its obligation to provide information pursuant to the General Data Protection Regulation of the European Union (Regulation 2016/679 of the European Parliament and of the Council) (hereinafter referred to as the "GDPR") with regard to the processing of data in the context of its accommodation services by means of this Privacy Notice.
- 1.2. The Data Controller shall in all cases ensure **the lawfulness and fairness of** the processing of personal data processed by it.
- 1.3. The purpose of this Privacy Notice is to **provide** the Data Controller **with clear, detailed, comprehensible and easily accessible information** to the persons interested in the accommodation service and the guests (hereinafter referred to as the "Data Subject or Guest") about all facts related to the processing of their personal data, rights and remedies related to the processing of personal data before the processing starts.
- 1.4. The Data Controller will use the personal data it processes **only for the** purposes for which the data owner has made it available (e.g. contacting). It does not transfer data to third parties, except for legal obligations (e.g. billing). It only stores data that is required for the performance of a contract, required by law or authorised by the Data Subject and protects it from unauthorised use
- 1.5. The Data Controller **shall make** this Privacy Policy **available** at the accommodation facility operated by the Data Controller - at the address of the accommodation facility at 9600 Sárvár, Anna Sugárút 7, 1st floor, apartment 8 - and shall send it to the Data Subjects in the first e-mail upon contact.
- 1.6. The submission of a reservation by the data subject constitutes acceptance of this Privacy Notice, acknowledgement of receipt thereof and voluntary consent to the processing.

2. THE CONTROLLER AND CONTACT DETAILS

- Name: **HERCZEG JÚLIA private individual with tax number**
- Tax number: **8502051075**
- Seat: **8600 Siófok, Ságvári utca 1.**
- Mailing address: **8600 Siófok, Ságvári utca 1.**
- Telephone: **+36 30 727 2337**
- E-mail: **julia.herczeg@gmail.com**

2.1. Accommodation operated by the Data Controller

- Name: **LAKESIDE LUXURY APARTMENT SARVAR**
- Type: **private accommodation**

- Title: 9600 Sárvár, Anna Sugárút 7, 1st floor apartment 8
- Registration number:
- NTAK registration number: MA24098821
- Telephone: +36 30 7272 337
- E-mail: szallas@luxuryapartman-sarvar.hu

- 2.2. The **LAKESIDE LUXURY APARTMAN SÁRVÁR** is a private accommodation facility operated by the Data Controller and registered by the Sárvár Joint Municipality Office under the number on the basis of the *Government Decree 239/2009 (X.20.) on the detailed conditions for the provision of accommodation services and the procedure for the issuance of accommodation operation licences and Act CLXIV of 2005 on Commerce, Section 2.§ 39.*
- 2.3. The Data Controller shall act in the course of all administration and data processing in connection with the accommodation service, and the **Data Controller shall independently determine the purpose and means of data processing. The Data Controller's immediate family member**, - her sister Herczeg Sára - **shall assist the Data Controller in the performance of the Data Controller's tasks related to the accommodation service, in the course of the administration and reception of guests**, and may thus become acquainted with the personal data of the Data Subjects.

3. ADATKEZÉSEK

3.1. Contacting, contacting, requesting a quote

- 3.1.1. Interested parties: interested parties who wish to use the accommodation service, guests who have used the accommodation service before.
- 3.1.2. Scope of personal data processed: data subjects can choose the contact details they use to contact the Data Controller - in person, by telephone, by e-mail or via the accommodation's Facebook page. In case of a request for a quote, the Data Controller will ask the Data Subjects to provide the following data: surname, first name and contact details (e-mail address, telephone number).
- 3.1.3. Purpose of data processing: contacting, maintaining contact, providing information, making offers.
- 3.1.4. Legal basis for processing: voluntary request, voluntary consent of the Data Subject /Article 6(1)(a) GDPR/
- 3.1.5. Duration of data processing: the Data Controller deletes the data of those interested in the accommodation service within 14 days after sending the offer. The Data Controller shall record the contact details of the Guests who have used the accommodation service electronically in an Excel spreadsheet (see point 3.7) and shall keep them until the last day of the year following the year in question, i.e. for a maximum of 2 years or until the Data Subject requests that the data be deleted.

3.2. Booking

- 3.2.1. Target group: guests using the accommodation service.

- 3.2.2. The scope of the personal data that can be processed: reservations can be made in person, by phone, by e-mail, on the Facebook page of the accommodation. In the case of direct/indirect bookings received by the Data Controller, the Data Controller requests the following data from the Data Subjects: Guest's surname and first name, address, contact details (e-mail address, telephone number) and, if required for billing purposes at the Data Subject's request, billing details and tax number. In case of payment by bank transfer, the Data Controller may obtain the bank account number of the Data Subject, and in case of payment by Széchenyi Pension Card (SZÉP Card), the number of the SZÉP Card of the Data Subject.
- 3.2.3. Purpose of data processing: provision of accommodation services.
- 3.2.4. Legal basis for processing: performance of a contract and fulfilment of a legal obligation (invoicing) /Article 6(1)(b) and (c) GDPR/
- 3.2.5. Duration of data processing: the Data Controller stores the personal data (name, address) of the Guests who have used the accommodation service on the account until the end of the 8th year following the year in question, based on the legal obligation.

3.3. **Community site and accommodation portal**

- 3.3.1. Accommodation operated by the Data Controller - *Lakeside Luxury Apartment Sárvár* - are available on the Facebook community portal, at the link below:
<https://www.facebook.com/profile.php?id=61562348177894>
- 3.3.2. A Facebook user can subscribe to the news feed posted on the message board by clicking on the "like" link on the page, unsubscribe by clicking on the "dislike" link on the same page, or delete unwanted news on the message board by using the message board settings. The data controller has access to the profile of "followers" but does not record it or manage it in its own internal system.
- 3.3.3. Purpose of data processing: advertising of accommodation operated by the Data Controller, sharing of content, other news, promotions, information, contact, booking of accommodation.
- 3.3.4. Legal basis for processing: voluntary request, voluntary consent of the Data Subject, which may be withdrawn at any time by unsubscribing. /Withdrawal does not affect the lawful processing that preceded it. In the event of withdrawal, you will not receive a notification of a news feed, our news will not appear on your feed. However, our pages are still accessible to everyone, as our pages are public.
- 3.3.5. Duration of processing: until the data subject unsubscribes.
- 3.3.6. Facebook is a separate data controller independent from the Data Controller. For information about the processing of data on the Pages, please refer to the Privacy Policy and the Privacy Policy on the Facebook website at the links below:
<https://www.facebook.com/policies/cookies/>
<https://www.facebook.com/about/privacy/update>
<https://privacycenter.instagram.com/>
- 3.3.7. The accommodation is advertised by the data controller on an accommodation portal. The accommodation brokerage portals are also separate data controllers,

independent from the Data Controller, so when booking accommodation on these platforms, our Guests can find out about the processing of their personal data on the website of the relevant accommodation brokerage portal.

3.4. **Electronic guest register application / COMPANY accommodation management software**

In accordance with the legal requirements, the Data Controller electronically records reservations and Guests' personal data **in the accommodation management software (VENDOR)** and performs the administrative tasks related to the accommodation service. Data can only be submitted to the NTAK and VIZA via accommodation management software (see points 3.4 and 3.5).

3.5. **National Tourist Information Centre (NTAK)**

3.5.1. Under the supervision of the **Hungarian Tourism Agency Zrt.**, an IT system, the **National Tourism Data Service Centre (hereinafter referred to as NTAK)**, operates for the purpose of national statistical data collection.

3.5.2. The NTAK receives **anonymous statistical data** electronically, through the accommodation management software, which does NOT contain the Guest's personal data, and does not receive, record or store any personal data. Notwithstanding the above, the Data Subject is informed below of the data processing rules:

3.5.3. Target population: guests using accommodation services.

3.5.4. Scope of the data that can be processed:

- a) the gender of the Guest,
- b) your nationality,
- c) place and date of birth,
- d) country of residence,
- e) the municipality and postcode of your permanent address.

3.5.5. The purpose of the data management: to measure the traffic statistics of all domestic accommodation establishments in a real and up-to-date manner, to prepare statements, summaries and analyses for the tourism sector based on the statistical data received.

3.5.6. Legal basis for processing: to comply with a legal obligation to which the Data Controller is subject.

/Article 6(1)(c) GDPR/.

Fulfillment of obligations under *Act CLVI of 2016 on the State Tasks of the Development of Tourist Areas*, and its implementing *Government Decree 235/2019 (X. 15.)*, and *Government Decree 239/2009 (X. 20.) on the detailed conditions for the provision of accommodation services and the procedure for issuing accommodation operating licences*.

According to Section 5(3) of Government Decree No. 239/2009 (20.X.), accommodation services may be provided in accommodation establishments that

have accommodation management software. The software sends the accommodation service data electronically to NTAK in the manner required by law, which ensures the Data Controller's compliance with the law. The obligation for accommodation operators to provide data will apply from 01 January 2020.

3.6. Guest Information Closed Database (VIZA)

- 3.6.1. As of 1 September 2021, in accordance with the legislation in force, the accommodation provider will record the personal data of the users of accommodation services in Hungary as defined by law in the accommodation **management software (VENDÉGEM) via a document reader.**
- 3.6.2. The software transfers the data to a repository, the **Visitor Information Closed Database (VIZA)**. The hosting provider is the Hungarian Tourism Agency (MTÜ).
- 3.6.3. Guests' personal data is **encrypted in** the VIZA system from the accommodation management software (MY GUEST).
- 3.6.4. The document scanning module of the VENDÉGEM software can scan **Hungarian ID cards, driving licences and passports, European ID cards, passports and driving licences, and passports for guests from third countries.**
- 3.6.5. **Failure to present this document will result in the Accommodation Provider refusing to provide the accommodation.**
- 3.6.6. Although the documents listed include a photograph, **neither the photograph nor any other biometric identifier can be accepted by the VIZA system** and will not be scanned, captured or transmitted. The document reader reads the document data into the VENDOR accommodation management software.
- 3.6.7. Data that cannot be recorded through the document reader in the Accommodation Management Software will be recorded by the Accommodation Provider in the Accommodation Management Software through **manual data entry.**
- 3.6.8. **Data recording without the presence of a guest (remote document reading)**
 - a) The Data Controller may provide the Guest with the possibility, through the accommodation manager's software, to scan his/her personal data required by law from his/her document remotely, digitally, by means of a document scanner.
 - b) It remains the responsibility of the accommodation provider (Data Controller) to verify the data provided by the Guest before transferring it to the VIZA system. Therefore, with regard to the data provided during the remote document scanning, the accommodation provider must verify the identity of the person and the authenticity of the pre-recorded data at the latest upon the arrival of the Guest.
 - c) The check can be done before the guest arrives, either by video call or by a digital image to prove the match.
- 3.6.9. Target group: guests using accommodation services.
- 3.6.10. Scope of personal data processed: the Data Controller records the following personal data of the Guests in the VENDOR accommodation management software:
 - a) surname and given name;
 - b) surname and given name at birth,

- c) your place of birth;
- d) your date of birth;
- e) gender;
- f) citizenship;
- g) mother's maiden name and surname,
- h) identity or travel document identification data;
- i) for third-country nationals (who are not EU nationals), the visa or residence permit number, date and place of entry,
- j) In the case of data recording without the presence of a guest (3.6.7.), the e-mail address of the customer.

3.6.11. Purpose of the processing: to protect the rights, safety and property of the data subject and others, and to monitor compliance with the provisions on the residence of third-country nationals and persons enjoying the right of free movement and residence.

3.6.12. Legal basis for processing: Fulfilling a legal obligation on the controller /Article 6 (1) (c) GDPR/ Fulfilling the data reporting obligation under Article 9/H of Act CLVI of 2016 on State Tasks for the Development of Tourist Areas and Article 14/C of Government Decree 235/2019 (X. 15.) on the implementation of the Act.

3.6.13. Duration of data processing: the Data Controller stores the personal data of the Guests in the accommodation management software (MY GUESTS) until the last day of the first year following the date of their disclosure. These data are encrypted in the VIZA system from the accommodation management software. For legal reasons, the data may only be used for the period of storage required by the accommodation provider, after which it will be deleted from the VIZA system.

3.7. **Electronic Guest Data Register (Excel spreadsheet)**

3.7.1. Reservations and Guest contact details are recorded and stored electronically by the Data Controller in an Excel spreadsheet.

3.7.2. Target group: guests using accommodation services.

3.7.3. Scope of personal data processed: the Data Controller records the following personal data of the Guests in the Excel spreadsheet:

- a) surname and given name;
- b) contact details: e-mail address, telephone number.

3.7.4. The purpose of the data management is: to make it easier for the Data Controller to manage the reservations, to make them more transparent, to record all reservations in one interface, to prevent overbooking, to keep a record of the contact details of the Guests.

3.7.5. Legal basis for processing: performance of a contract /Article 6(1)(b) GDPR/

3.7.6. Duration of data processing: the Data Controller keeps the data of the Guests who have used the accommodation service until the last day of the year following the year in question, i.e. for a maximum of 2 years or until the Data Subject's request for data erasure.

- 3.8. **Possible consequences of non-delivery of data:** impossibility to use the service for the services described in points 3.1.-3.6 above.
- 3.9. **Persons entitled to access the data in relation to points 3.1 - 3.7:** the Data Controller, the Data Controller's immediate family member (sister, Sára Herczeg) and the data processors listed in point 4.

4. THE RECIPIENTS/PROCESSORS OF THE PERSONAL DATA

Data processor: a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller; (Article 4(8) GDPR) The use of a data processor does not require the prior consent of the Data Subject, but the Data Subject must be informed. Accordingly, I provide the following information:

4.1. National Tourism Agency (NGO)

- 4.1.1. Prepares reports, summaries and analyses for the tourism sector based on the statistical data received.
- 4.1.2. The MTU is the hosting provider and the Data Processor for the data stored in the Closed Guest Information Database (VIZA). In this capacity:
- manage the guest data solely on the basis of the instructions of the accommodation provider (Data Controller), and may only carry out operations in relation to them in accordance with Article 14 of Government Decree 235/2019 (X. 15.) on the implementation of the Tourism Act and the Act on the State Tasks of the Development of Tourist Areas;
 - ensures that its employees performing the tasks related to its role as a tourist hosting provider are bound by confidentiality obligations with regard to guest data;
 - implement appropriate technical and organisational measures, taking into account the state of the art and the cost of implementation, the nature, scope, context and purposes of the processing and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons, in order to ensure a level of data security appropriate to the level of risk, by encrypting data to ensure that its employees do not have access to guest data;
 - the accommodation provider (Data Controller) may not use any other data processor without prior written authorisation, either ad hoc or general;
 - assist the Data Controller, to the extent possible, by appropriate technical and organisational measures, taking into account the nature of the processing, to fulfil its obligations in relation to the exercise of the rights of the data subject;
 - assists the Data Controller, taking into account the nature of the processing and the information available to the data processor, in fulfilling its obligations regarding the security of processing and the handling of possible incidents;
 - after the termination of the data processing relationship, act in accordance with the Data Controller in relation to the guest data and copies thereof, unless the law or a binding legal act of the European Union requires the continued storage of the guest data;
 - The Data Controller shall provide the accommodation provider with all the information necessary to verify the fulfilment of the obligations laid down in the data processing

- relationship and to enable and facilitate the checks, including on-site inspections, carried out by the accommodation provider or by a person authorised by it;
- inform the Controller without delay if he/she considers that any of its instructions infringes the provisions on the protection of personal data.

4.2. Central Statistical Office

The HCSO has access to the data specified by law in order to perform its tasks as defined in the Statistics Act.

4.3. National Tax and Customs Administration (NAV):

- 4.3.1. From 01 January 2021, the data content of all invoices issued by the Data Controller will be transmitted to the NAV.
- 4.3.2. Purpose of the processing: to fulfil the obligation to provide invoice data.

4.4. Sárvár Joint Municipality Office

- 4.4.1. The notary shall carry out official inspections of accommodation establishments every 6 years, and official inspections of the obligation of accommodation providers to register and provide regular data to the National Tourist Information Centre every year. The tax department of the municipal administration has access to the relevant statistical data of the accommodation establishments under its jurisdiction in order to monitor the payment of tourism tax.
- 4.4.2. The purpose of the data processing: official control of accommodation service activities and statistical data provision.

4.5. Police

- 4.5.1. The VIZA system data may be searched by the police for the purposes of law enforcement, crime prevention, protection of public order, public security, public order, the protection of the rights, safety and property of the data subject and others, and the conduct of wanted persons' searches, but the full content of the VIZA system data cannot be known to the police.
- 4.5.2. The activity of the tourism hosting service provider (TSP) is limited to storing the data in encrypted form and providing access to the data to the accommodation provider and the police. The MTU does not have access to the data, nor does it have the right to access the data or the technical means to do so.
- 4.5.3. Purpose of the processing: to protect the rights, safety and property of the data subject and others, and to monitor compliance with the provisions on the residence of third-country nationals and persons enjoying the right of free movement and residence.

5. DATA SECURITY MEASURES

- 5.1. The personal data of data subjects are stored electronically. The place of storage of the personal data is the Data Controller's registered office, as indicated in this Notice.

- 5.2. The Data Controller shall make every reasonable effort to ensure the security of personal data for all purposes and in relation to its lawful processing, both in the network system and in the storage and retention of the data.
- 5.3. The Data Controller shall take appropriate measures to protect the data against accidental or unlawful destruction, loss, alteration, damage, unauthorised disclosure or access.
- 5.4. The Data Controller keeps the computer in a locked room, protects the IT systems, electronic data processing and record-keeping with a firewall, virus protection and password, which meets the requirements of data security.
- 5.5. Only the Data Controller and the Data Controller's immediate family member (her sister Sára Herczeg) may access the data.

6. THE RIGHTS OF DATA SUBJECTS

6.1. Right to prior information

The data subject is entitled to be informed of the facts and information relating to the processing before the processing starts.

6.2. Right of access

- 6.2.1. The data subject has the right to request information about the processing of his or her personal data, in particular from the Data Controller.
- 6.2.2. The data subject shall have the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, if such processing is ongoing, the right to access the personal data and to be informed of the purposes and legal basis of the processing, the personal data processed, the identity of the processor, the duration of the processing, the rights of the data subject and the right to lodge a complaint.
- 6.2.3. The Data Controller shall provide the Data Subject with a copy of the personal data subject to processing.

6.3. Right to rectification

The data subject shall have the right to obtain from the Data Controller, at his or her request and without undue delay, the rectification of inaccurate personal data relating to him or her. Taking into account the purpose of the processing, the data subject shall have the right to request the completion of incomplete personal data.

6.4. Right to erasure

- 6.4.1. At the data subject's request, the Data Controller shall delete personal data concerning him or her without undue delay if one of the following grounds applies:
 - the purpose of the processing has ceased, or
 - the Data Subject withdraws his or her consent to the processing of personal data and there is no other legal basis for the processing, or
 - the Data Subject exercises his or her right to object, or

- the processing is unlawful, or
- the erasure of the data concerned is required by law.

6.4.2. The deletion requested by the data subject may only concern the deletion of data processed on the basis of his or her consent, and thus does not affect the scope of data subject to mandatory processing for the performance of a contract and the fulfilment of a legal obligation.

6.5. Right to restriction of processing

6.5.1. At the request of the data subject, the Data Controller shall restrict the processing in the following cases:

- the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the Controller to verify the accuracy of the personal data; or
- the processing is unlawful, but the Data Subject does not request the erasure of the data, but instead requests the restriction of their use; or
- the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- The Data Subject has objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the Data Controller prevail over the legitimate grounds of the Data Subject.

6.5.2. The Data Controller shall inform the Data Subject at whose request the processing has been restricted in advance of the lifting of the restriction.

6.6. Obligation to notify the rectification or erasure of personal data or restriction of processing

The controller shall inform each recipient to whom or with which the personal data have been disclosed of any rectification, erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort. Upon request, the controller shall inform the Data Subject of these recipients.

6.7. Right to data portability

Subject to the conditions set out in the GDPR, the Data Subject has the right to receive personal data provided to the Data Controller in machine-readable format and the right to transmit such data to another Data Controller.

6.8. Right to object

The Data Subject may object to the processing of his or her personal data if the processing or transfer of the personal data is necessary solely for the purposes of the legitimate interests pursued by the Controller or a third party (except in the case of mandatory processing). If the Controller finds the Data Subject's objection to be justified, the Data Subject shall delete the personal data without undue delay.

6.9. Right to withdraw consent

You have the right to withdraw your consent to the processing of your personal data at any time. However, the right of withdrawal shall not affect the lawfulness of the processing carried out on the basis of the consent prior to the withdrawal.

7. LEGAL REMEDIES

7.1. The right to lodge a complaint with a supervisory authority (right to official redress)

Data subjects have the right to lodge a complaint with the supervisory authority if they consider that the processing of personal data relating to them infringes the GDPR.

In Hungary, the data subject may lodge a complaint with **the National Authority for Data Protection and Freedom of Information (NAIH)** regarding the data processing procedures of the Data Controller:

- Postal address: 1363 Budapest, Pf.: 9.
- Address: 1055 Budapest, Falk Miksa utca 9-11.
- Phone: +36 (1) 391-1400,
- Fax: +36 (1) 391-1410
- E-mail: ugyfelszolgalat@naih.hu
- URL: <http://naih.hu>

7.2. Right to judicial remedy

You can also choose to pursue your claim in court. The tribunal has jurisdiction to hear the case. The action may also be brought, at the option of the person concerned, before the courts for the place where he or she resides or is domiciled.

8. THE RULES CONCERNING THE REQUEST SENT BY THE DATA SUBJECT TO THE CONTROLLER

8.1. The data subject shall send the requests indicated in this Notice and the withdrawal of consent to data processing in writing to the following address:

Mailing address: 8600 Siófok, Ságvári utca 1.
E-mail: julia.herczeg@gmail.com

8.2. The Controller shall examine the requests received without delay and shall comply with the request within 30 days of receipt of the request at the latest. If the Data Controller finds the Data Subject's request to be unfounded and refuses to comply with it, it shall notify the Data Subject in writing of the refusal and the reasons for the refusal, together with information on the remedies available, within 30 days of receipt of the request.

9. PROCEDURE IN THE EVENT OF A DATA PROTECTION INCIDENT

9.1. The Data Controller shall protect the personal data of the Data Subject to the best of its ability, provide a modern and reliable IT environment, and carry out its internal processes in a controlled manner in order to prevent, avoid or, if the slightest error, problem or incident occurs in relation to the processing of personal data, detect, investigate and handle the incident.

9.2. *Data breach*: a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

- 9.3. If the Data Subject becomes aware of a personal data breach as defined above in connection with personal data processed by the Data Controller, please notify us immediately using the contact details indicated in section 8.1. The Data Controller will investigate the data breach without delay, notify the National Authority for Data Protection and Freedom of Information within 72 hours of becoming aware of it at the latest, *if the data breach is likely to pose a risk to the rights and freedoms of natural persons, and* take measures to remedy the incident. The Data Controller shall keep records of the data protection incidents.

10. ACCEPTANCE OF, AMENDMENTS TO THE PRIVACY NOTICE

- 10.1. The Data Controller **shall make** this Privacy Notice **available** at the accommodation facility operated by the Data Controller - at the address of the accommodation facility at 9600 Sárvár, Anna Sugárút 7, 1st floor, apartment 8 - and shall send it to the Data Subjects in the first e-mail upon contact.
- 10.2. The submission of a reservation by the data subject constitutes acceptance of this Privacy Notice, acknowledgement of receipt thereof and voluntary consent to the processing.
- 10.3. The Data Controller is entitled to amend this Privacy Notice unilaterally. The amended Privacy Notice will be published in the accommodation it operates.

11. DATA PROTECTION OFFICER

The Data Controller does not engage in any activities that would justify the employment of a Data Protection Officer.

12. THE RULES ON DATA PROCESSING

The definitions in this Privacy Notice are the same as the interpretative definitions set out in Article 4 of the GDPR.

- 12.1. **Personal data:** any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
- 12.2. **Data processing:** any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction by any means
- 12.3. **Filing system:** a set of personal data, structured in any way - centralised, decentralised or structured according to functional or geographical criteria - which is accessible on the basis of specific criteria
- 12.4. **Controller:** a natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of

personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or specific criteria for the designation of the controller may also be determined by Union or Member State law

- 12.5. **Data processor:** a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller
- 12.6. **Recipient:** the natural or legal person, public authority, agency or any other body, whether or not a third party, with whom or to which the personal data are disclosed. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of such data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing
- 12.7. **Third party:** a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data
- 12.8. **Consent of the data subject:** a freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her.
- 12.9. **Data breach:** a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed

13. PRINCIPLES GOVERNING THE PROCESSING OF PERSONAL DATA

Personal data:

- 13.1. processing must be lawful, fair and transparent for the Data Subject ("lawfulness, fairness and transparency");
- 13.2. collected only for specified, explicit and legitimate purposes and not in a way incompatible with those purposes ("purpose limitation");
- 13.3. be adequate and relevant for the purposes for which the data are processed and limited to what is necessary ("data minimisation");
- 13.4. be accurate and, where necessary, kept up to date; all reasonable steps must be taken to ensure that personal data which are inaccurate for the purposes for which they are processed are erased or rectified without undue delay ("accuracy");
- 13.5. be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ("limited storage");
- 13.6. be carried out in such a way as to ensure adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage ("integrity and confidentiality"), by implementing appropriate technical or organisational measures;

- 13.7. The data controller is responsible for compliance with the above and is able to demonstrate such compliance ("accountability").

14. LEGAL BASIS FOR PROCESSING

The Controller processes personal data if it meets one of the following legal bases:

- a. The data subject has given his or her freely given, specific, informed, unambiguous and verifiable consent to the processing of his or her personal data for a specific purpose,
- b. The processing is necessary for the performance of a contract where the data subject is one of the parties or initiates the conclusion of the contract,
- c. Necessary for the controller to comply with its legal obligations,
- d. The processing is necessary to protect vital interests;
- e. The processing is necessary for the performance of a task carried out in the public interest;
- f. Necessary for the purposes of the legitimate interests pursued by the controller or a third party, provided that those interests can be demonstrated by means of a balancing test.

15. THE MAIN LEGISLATION ON DATA PROCESSING AND THEIR ABBREVIATIONS

- 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation, GDPR);
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Infotv.);
- Act V of 2013 on the Civil Code (Civil Code);
- Act C of 2000 on Accounting;
- Act CL of 2017 on the Rules of Taxation;
- Act C of 1990 on Local Taxes;
- Act CLXIV of 2005 on Trade;
- Act CLVI of 2016 on State Tasks for the Development of Tourist Areas;
- Government Decree No 235/2019 (X. 15.) on the implementation of Act CLVI of 2016 on the implementation of the State Tasks of the Development of Tourist Areas;
- Government Decree No 414/2015 (XII. 23.) on the issuance of identity cards and the rules for the uniform taking of facial images and signatures.
- Government Decree No 239/2009 (X. 20.) on the detailed conditions for the provision of accommodation services and the procedure for issuing accommodation operating licences;

Done at Sárvár, 29 August 2024.

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Julia Herczeg
Data controller / Accommodation provider