

DATA PROTECTION POLICY

M-R Belvárosi Lakópark Kft.

Date of entry into effect: 01 January 2024.

We place great importance on the protection of personal data. Therefore, we would like to inform you about the data management and processing procedures we apply in connection with our activities and the information we send you. Below you will find information about what data we collect and process, for what purposes, and what we do to protect your privacy and enforce your rights

1. INTRODUCTION

The M-R Belvárosi Lakópark Kft. (registered office: 1134 Budapest, Váci út 47/B Ü-1.; tax number: 24203166-2-41; company registration number: 01 09 200861) (hereinafter referred to as "Data Controller") as Data Controller acknowledges the contents of this Privacy Policy as binding upon itself in the course of its activities.

In connection with its activities, the Data Controller processes the personal data of its partners, customers, visitors to the <https://fibulahotel.hu/> website, interested parties, job applicants, members, volunteers, sponsors, representatives of subcontractors assigned to tasks and, where applicable, the recipients of the activity (hereinafter referred to as "Data Subjects"). The Data Controller undertakes to ensure that the processing of data relating to the services it provides on the Website and otherwise complies with applicable law.

M-R Belvárosi Lakópark Kft. respects the rights of the Data Subjects, treats their personal data and all data and facts that come to its knowledge confidentially, and uses them exclusively for the performance of its activities, for the activities described in the Data Management Information Notice, and for its own research and statistical reporting.

We take reasonable steps to provide the data subject with information about the processing of personal data in a concise, transparent, intelligible, and easily accessible form, in clear and plain language.

The Data Controller reserves the right to unilaterally amend this Notice. In this regard, it is recommended to regularly visit the website <https://fibulahotel.hu/> operated by the Data Controller, where the current content of the Privacy Notice can be consulted and downloaded. A copy of the current version of this Notice will be sent to the Data Subject upon request.

The requirements set out in this Privacy Notice are in accordance with the applicable data protection legislation:

- The Basic Law of Hungary (Freedom and Responsibility, Article VI);
- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL 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);



- Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (Infotv.); Act V of 2013 on the Civil Code;
- Act V of 2013 on the Civil Code § 5:54, § 5:55, § 5:59 and § 5:61;

1.1. Data of the Data Controller

- M-R Belvárosi Lakópark Kft.
- Address: 1134 Budapest Váci út 47/B Ü-1.
- Company registration number: 01 09 200861
- VAT number: 24203166-2-41
- E-mail: sales@fibulahotel.hu
- Phone number: +36 30 327 3222

2. BASIC CONCEPTS OF DATA PROTECTION

2.1. Personal information

Any data that can be associated with a specific natural person (identified or identifiable) (hereinafter referred to as "Data Subject"), the inference that can be drawn from the data concerning the Data Subject. The personal data shall retain its quality during processing for as long as its link with the data subject can be re-established. In particular, a person may be regarded as identifiable where he or she can be identified, directly or indirectly, by reference to a name, number, location data, an identification mark or to one or more factors specific to his or her physical, physiological, genetic, mental, spiritual, economic, cultural or social identity;

2.2. Contribution:

A voluntary and explicit indication of the data subject's wishes, based on appropriate information, by which he or she gives his or her unambiguous consent to the processing of personal data concerning him or her, either in full or in relation to specific operations;

2.3. Consent-based processing

We ask for the consent of visitors to process data related to their visit to the website and to send targeted promotional information (newsletter).

By giving consent, we process the personal data of the data subject until the consent is withdrawn. After the withdrawal of consent, we will delete the data subject's data from our records.

The legal basis for processing the data provided on our website is the informed consent of the data subject.

2.4. Data Controller

The natural or legal person or unincorporated body which determines the purposes for which personal data are to be processed, takes and executes decisions regarding the processing (including the means used) or has them executed by a processor on its behalf;



2.5. Data management

Regardless of the process used, any operation or set of operations which is performed on personal data, such as collection, recording, recording, organisation, storage, alteration, use, disclosure, transmission, alignment or combination, blocking, erasure and destruction, and prevention of further use of the data. Processing also includes the taking of photographs, audio or video recordings and the recording of physical characteristics that can be used to identify a person (e.g. fingerprints, palm prints, DNA samples, iris scans);

2.6. Data transfer

If the data is made available to a specified third party;

2.7. Disclosure to the public

If the data is made available to anyone;

2.8. Data deletion

Making the data unrecognisable in such a way that its recovery is no longer possible;

2.9. Data storage

Making it impossible to transmit, access, disclose, transform, alter, destroy, erase, interconnect or coordinate and use the data permanently or for a specified period;

2.10. Data erasure

Complete physical destruction of the data or the medium containing the data;

2.11. Data processing

The performance of technical tasks related to data processing operations, irrespective of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data;

2.12. Data Controller

The natural or legal person or unincorporated body who or which carries out the processing of personal data on behalf of the controller, including on the basis of a legal mandate;

2.13. 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



2.14. EEA- country

A Member State of the European Union and another State party to the Agreement on the European Economic Area, as well as a State whose nationals enjoy the same status as nationals of a State party to the Agreement on the European Economic Area under an international treaty concluded between the European Community and its Member States and a State not party to the Agreement on the European Economic Area;

2.15. Third country:

Any state that is not an EEA state.

2.16. Data protection incident

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.

2.17. Biometric data

Any personal data relating to the physical, physiological or behavioural characteristics of a natural person obtained by means of specific technical procedures which allow or confirm the unique identification of a natural person, such as facial image or dactyloscopic data.

2.18. Medical data

Personal data relating to the physical or mental health of a natural person, including data relating to health services provided to a natural person which contain information about the health of the natural person.

2.19. Security incident

Any event that could adversely affect the confidentiality, integrity or availability of an IT device or the data stored on it.

2.20. Confidentiality (secrecy)

The characteristic of the data is that only a predefined set of users (authorised users) are allowed access, access by everyone else is illegal.

2.21. Public part of private land

Private land which is available to all without restriction, including that part of public land to which the person responsible for the protection of persons and property is entitled by virtue of a civil law transaction, in particular a tenancy or lease, provided that: (a) the occupation or use of the part of the land is integrally connected with, or serves to ensure the continuity of, or to assist, the activity carried out in the public part of the private land guarded by the person responsible for the protection of persons and property; or (b) it is used to accommodate the belongings of the data controller or of the public using the public part of the private land.



2.22. Profiling

Any form of automated processing of personal data in which personal data are used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with the performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements of that person.

2.23. Intactness

A criterion for the existence, authenticity, integrity and intrinsic completeness of data, which ensures that the data, information or program can only be altered by those authorised to do so and cannot be altered without being detected.

2.24. Regulations

The Data Controller's Privacy Policy.

2.25. Asset protection security system

An electronic signalling and visual surveillance system installed for the purpose of asset protection on the real estate covered by the territorial scope of the Privacy Policy, including electronic surveillance systems operated for the purpose of surveillance without recording or allowing for audio or video recording (surveillance), an electronic access control system, a burglar alarm system, a remote monitoring system, a security system for data and information protection, and any other electronic technical solution which allows the transmission of signals and images or the signalling of light or sound.

2.26. Guest

A natural person who is not an employee of the Data Controller and who is authorised to be present on the real estate covered by the territorial scope of the Data Processing Rules.

2.27. Access, use and transfer of data

Personal data stored about data subjects may be accessed only by the person who needs to know them in order to fulfil his or her obligations. The name of the person who has access to the personal data or who is otherwise entitled to have access to the personal data, the reason for and the time of access to the data shall be recorded in a record.

Use is when personal data is used as evidence in judicial or other official proceedings. A person whose right or legitimate interest is affected by the recording of his or her personal data may, within 3 (three) working days of the recording of the personal data, request that the data not be destroyed or erased by the controller by providing evidence of his or her right or legitimate interest. At the request of a court or other authority, the personal data shall be transmitted to the court or authority without delay. If no such request is made within thirty (30) days of the request for non-destruction, the recorded image and/or sound recording and other personal data shall be destroyed or erased



Personal data may be disclosed to third parties only with the prior written consent of the data subject. This does not apply to the processing described in the Privacy Notice or to any transfers required by law, which may only take place in exceptional cases. We inform data subjects that we use data processors to process and store the data processed in our employer's human resources system. The Data Controller will inform the data subjects about the identity of the processors in this document.

2.28. Objection

A declaration by the data subject objecting to the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data;

3. DATA PROTECTION PRINCIPLES

Personal data:

- a) be lawful, fair and transparent for the data subject ("lawfulness, fairness and transparency");
- b) be collected only for specified, explicit and legitimate purposes and not processed in a way incompatible with those purposes; further processing for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes ("purpose limitation") is not considered incompatible with the original purpose in accordance with Article 89(1) of the GDPR;
- c) be adequate, relevant and limited to what is necessary for the purposes for which the data are processed ("data minimisation");
- d) 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");
- e) 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; personal data may be kept for longer periods only if the personal data will be processed for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR, subject to the implementation of appropriate technical and organisational measures as provided for in this Regulation to safeguard the rights and freedoms of data subjects ('limited storage');
- f) 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.

The Controller is responsible for compliance with the above and must be able to demonstrate such compliance ("accountability"). The Controller does not collect personal data relating to minors.

4. THE DETAILED RULES FOR DATA PROCESSING



Who has access to the data:

- employees of the Data Controller;
- employees of the Data Processors identified below;
- certain public authorities in respect of data requested by them in the course of official proceedings and which the Data Controller is legally obliged to provide;
- employees of a debt management company appointed by the Data Controller to manage overdue debts;
- other persons with the express consent of the Data Subject.

The Data Controller undertakes to maintain strict confidentiality with regard to the personal data it processes, without any time limitation, and shall not disclose them to any third party, except with the consent of the Data Subject and the processing described in this Notice.

The Data Controller's employees and partners contractually undertake to treat the data entrusted to them, collected, processed or learned by them confidentially in accordance with the provisions of this Notice and its Privacy Policy, and not to disclose them to third parties.

The withdrawal of consent does not affect the lawfulness of the previous processing.

4.1. Visiting the Website

Purpose of data processing

By using the website, the Data Subject (the user of the website <https://fibulahotel.hu/>) may be informed about the services provided by the Data Controller.

Scope of data processed and detailed purposes of data processing

- The Data Subject (user of the <https://fibulahotel.hu/> website): during the visit of the website, the service provider records the visitor's data in order to monitor the operation of the services and prevent abuse.
- IP address: identification
- operating system: statistical use
- browser: statistical usage

Legal basis for processing:

The legal basis for processing is the consent of the Data Subject (Article 6(1)(a) GDPR).

Balance of interests: our company has a legitimate interest in the secure operation of the website.

Duration of data processing

The Data Controller will retain the personal data until the Data Subject's consent is withdrawn, failing which the personal data will be deleted 90 days after leaving the website. The Data Subjects may withdraw their consent at any time by sending a request for the deletion of their personal data by post to the address Jókai utca 19, 7621 Pécs, Hungary, or by sending an electronic message to the address sales@fibulahotel.hu.



4.2. Data processing in relation to cookies on our website

Purpose of data processing

The services available on the website of the Data Controller <https://fibulahotel.hu/> place unique identifiers, so-called cookies, on the computers of the Data Subjects (users). These are used exclusively to identify the current session of the visitor, to store the data provided during the session, to prevent data loss and to analyse the Data Subject's habits anonymously using Google Analytics. Such data may include the visitor's IP address, time and duration of the visit, pages visited, browser type, operating system, etc. These data are stored and treated confidentially and are used only for the further development of the Controller's website and for the production of statistics.

Details of how cookies work and how they work are set out in section 10 of this Notice.

The scope of the data processed and the detailed purposes of the processing

- The Data Subject (user of the website <https://fibulahotel.hu/>)
- IP address: identification, certification
- operating system: statistical use
- browser: statistical use
- Date and duration of visit: identification, certification
- Cookie acceptance date: identification, certification
- The fact of accepting the cookie: confirmation of consent
- Sites visited: statistical usage

Time spent on pages visited: statistical use

Legal basis for processing

The legal basis for processing is the consent of the Data Subject (Article 6(1)(a) GDPR).

The use of cookies can be approved by the visitor by clicking on the "OK" button in the pop-up window on the home page of the website. By visiting the website of the Data Controller and accepting the cookie, the Data Subject accepts the following terms and conditions, even if he/she is not registered. The user can delete the cookie from his/her computer or disable the use of cookies in his/her browser.

Duration of processing

The Controller shall retain the personal data until the Data Subject's consent is withdrawn. The Data Subjects may withdraw their consent at any time by sending a letter by post to the address 9 Teréz u., 7621 Pécs, Hungary, or by sending an electronic message to the address info@fibulahotel.hu. In the absence of a withdrawal, we will delete the data after a maximum of 30 days from the date of visiting the website

4.3. Contacting us, fulfilling a request for information

Purpose of data processing



In order to support the objectives set by the Government and to implement the legal obligation, it is necessary to process personal data.

Scope of the data processed

The Data Subject using the accommodation service:

- surname and given name
- surname and forename at birth
- place and date of birth
- sex
- nationality
- mother's maiden name and surname

The Data Subject using the accommodation service:

- identification details of your identity document or travel document,
- a scanned image of your identification document
- for third-country nationals, the visa or residence permit number,
- date and place of entry,

Information related to accommodation services:

- the exact address of the accommodation,
- the start and expected and actual end dates of use of the accommodation.

Legal basis for data processing

The legal basis for data processing is the fulfilment of a legal obligation (Article 6(1)(c) of the GDPR). The process of data provision is prescribed and regulated by Act CLVI of 2016 on the State Tasks of the Development of Tourist Areas.

Duration of data processing

After the termination of the relationship with the Data Subject, the data shall be processed in accordance with the provisions of the Civil Code. 6:22 of the Personal Data Protection Act, we will delete the data after 2 years. We will keep the data for a longer period if required by law, for example, if we are obliged to keep the data pursuant to Section 169 of Act C of 2000 on Accounting ("Accounting Act"), we will delete the data after 8 years following the termination of the relationship with the Data Subject. In practice, this is the case if the data is part of the supporting accounting documents, for example, in the documents relating to the conclusion of the contract (the contract itself, where applicable) or the invoice issued, or for 6 years in the case of a police report.

4.5. Data processing related to customer service

Purpose of data processing

The Data Controller has access to the personal data of customers to the extent necessary to provide the service.



The scope of the data processed and the detailed purposes of the processing

- Surname: identification, contact
- First name: identification, contact
- E-mail address: identification, contact
- Telephone number: contact
- Information related to the management of the client's case.

Legal basis for processing

The legal basis for processing is the performance of a contract (Article 6(1)(b) GDPR).

Duration of data processing

Data processed for the purpose of providing information must be kept until the last day of the first year following the year in which it came to the knowledge of the data controller. The controller shall thereafter delete the personal data contained in the register. The VIZA system shall keep the data submitted to it for a maximum period of two years.

Data transmission:

The hosting service provider's activity as a data processor of the accommodation provider shall be limited to storing the data in encrypted form on the hosting service by a provider of encryption procedures designated by Government Decree and providing access to the data to a person or body authorised by law to do so through the accommodation provider and the accommodation provider. The recorded guest data are encrypted in the VIZA system and can only be accessed by the competent authorities, the hosting provider or the operator of the uploading document scanning software cannot have access to the data stored in the hosting.

4.5. Data processed during the check-in and check-out process:

It is in the interest of the Data Controller to manage the risks related to the admission and arrival of guests, visitors, customers, partners, to take the necessary and proportionate measures and, where justified, to limit their admission. The Data Controller may apply various solutions to ensure the safe conduct of visits, in accordance with applicable government regulations and based on an assessment of the current risks.

Purpose of processing:

In the case of pandemic control measures, to identify the risks related to the health status of guests and visitors entering the premises, and to certify compliance with the legal requirements.

Scope of the data processed:

Personal data of a Data Subject guest, visitor, customer or partner:

- the information on the document certifying good health
- the particulars on the vaccination certificate



· personal data on the identification document (e.g. identity card, driving licence, passport) required for the acceptance of the vaccination certificate

Personal data related to the access, visit

- time of entry: identification, verification
- date of departure: identification, verification
- name of the receiving person: identification, verification

Legal basis for processing

The legitimate interest of the Controller (Article 6(1)(f) GDPR) or the performance of a legal obligation (Article 6(1)(c) GDPR), where restrictions are required by government regulations.

Designation of legitimate interest

The legitimate interest is real and present, as the data controller has a real and continuous high number of external guests and visitors, so there would be a security risk if the accesses were unmonitored. The access process therefore effectively and immediately reduces the security risks posed by large numbers of accesses.

Duration of processing

The personal data of the data subjects are not stored by default, but may be stored by the Data Controller only in special situations or on the basis of the regulations in force, until the purpose is fulfilled or for a maximum of 1 year from the date of access.

4.6. Contacting us, fulfilling a request for information

Purpose of data processing

Data Subjects may contact the Data Controller with questions and requests for information. By storing the data provided, the Data Controller is able to identify the requester and provide the answer or the information required by the data subject.

The scope of the data processed and the detailed purposes of the processing

Personal data of the Data Subject:

- Full name: identification, contact
- E-mail address: identification, contact
- Telephone number: identification, contact

Subject of the contact

Text related to the contact



Legal basis for processing

The legal basis for processing is the data subject's consent (Article 6(1)(a) GDPR).

Duration of processing

The Controller shall retain the personal data until the Data Subject's consent is withdrawn. The Data Subjects may withdraw their consent and request the erasure of their personal data at any time by sending a letter by post to the address 9 Teréz u., 7621 Pécs, Hungary, or by sending an electronic message to the address info@fibulahotel.hu.

4.7. Data processing related to the further use of data provided in connection with registration

Purpose of data processing

In order to use the services of the Data Controller, the Data Subject must complete an online or paper registration form. When using certain services, the processed data will be further used so that it can be provided more easily in the future.

The scope of the data processed and the detailed purposes of the processing:

- Last name: necessary for identification, communication, contract performance
- First name: required for identification, communication, contract performance
- Nationality: required for identification, contract performance
- Eyepiece number: required for identification, performance of contract
- E-mail address: required for communication
- Telephone number: required for contact
- Full address: required for performance of contract
- Billing address: required for contract performance
- Execution of orders at the request of the Data Subject
- Payment method: required for performance of contract
- Vehicle registration number: required for performance of contract

Legal basis for processing

The legal basis for the processing is the performance of a contract (Article 6(1)(b) GDPR) or the fulfilment of a legal obligation (Article 6(1)(f) GDPR), where a legal obligation requires the processing and transfer of data.

Duration of data processing

After the termination of the relationship with the Data Subject, the data shall be processed in accordance with the provisions of the Civil Code. 6:22 of the Personal Data Protection Act, we will delete the data after 2 years. We will keep the data for a longer period if required by law, for example, if we are obliged to keep the data under Section 169 of Act C of 2000 on Accounting ("Accounting Act"), we will delete the data after 8 years following the termination of the relationship with the Data Subject.



In practice, this is the case if the data is part of the supporting accounting documents, for example, in the documents relating to the conclusion of the contract (the contract itself, where applicable) or the invoice issued, or for 6 years in the case of a police report.

4.8. Data processing related to customer service

Purpose of data processing

The Data Controller has access to the personal data of customers to the extent necessary to provide the service.

The scope of the data processed and the detailed purposes of the processing

- Surname: identification, contact
- First name: identification, contact
- E-mail address: identification, contact
- Telephone number: contact

Information relating to the handling of the customer's case.

Legal basis for processing

The legal basis for processing is the performance of a contract (Article 6(1)(b) GDPR).

Duration of data processing

After the termination of the relationship with the Data Subject, the data shall be processed in accordance with the provisions of the Civil Code. 6:22 of the Personal Data Protection Act, we will delete the data after 2 years. If we are obliged to retain the data pursuant to Section 169 of Act C of 2000 on Accounting ("Accounting Act"), we will delete the data after 8 years following the termination of the relationship with the Data Subject.

4.10. Facebook

On the Facebook page of the Data Controller - <https://www.facebook.com/fibulahotel/> - by clicking on the "like" link, the data subject consents to the publication of news and offers prepared by the Data Controller on his/her Facebook wall. The operators of the social networking sites are separate data controllers, independent from the Controller, and therefore the activities carried out there are covered by data management documents independent from the Controller.

For information about the data management of Facebook pages, please refer to the Privacy Policy and the Privacy Policy on the Facebook website - www.facebook.com.

Purpose of data processing

Communication on Facebook.com powered channels

The Data Controller communicates with data subjects through the social networking site only if the data subject has previously contacted the Data Controller through the social networking site, and thus the purpose of the scope of the data processed becomes relevant.



Sharing and disseminating information

The purpose of the presence on social portals, in particular Facebook, and the related data processing is the sharing, publication and marketing of the content on the website on social networking sites. The social networking site allows the data subject to keep up to date with the latest opportunities.

The Data Controller also publishes textual content, images and video footage of various events, the Data Controller's services, etc. on the <https://www.facebook.com/fibulahotel/> community page. The Data Controller may link the Facebook page with other social networking sites in accordance with the rules of the social networking site facebook.com, so the publication on the Facebook page shall be understood as publication on such linked social networking sites. Unless it is a public image or a public performance (Civil Code 2:48), the Data Controller will always ask for the written consent of the data subject before publishing the images.

Scope of data processed and detailed purposes of data processing

- Public name of data subject Identification, required for communication
- Public e-mail address of data subject: required for communication
- Message sent by the contact: element necessary for the communication to take place
- Result of an action by the data subject (e.g. evaluation, reply, etc.)

Legal basis for data processing

The use of social networking sites, and in particular the use of the <https://www.facebook.com/fibulahotel/> site and the contacting of the Data Controller through it, the contacting and other operations permitted by the social networking site, is based on voluntary consent. The operators of social networking sites are separate data controllers, independent of the Data Controller, and therefore the activities carried out there are covered by the data management documents for the social networking site, independent of the Data Controller.

For information about Facebook Page's privacy practices, please refer to the Privacy Policy and Guidelines on the Facebook website - <https://www.facebook.com/legal/terms>.

The data subject voluntarily consents to the following and liking of the content published by the Data Controller on the <https://www.facebook.com/fibulahotel/> website on the basis of the terms and conditions of the social networking site. By way of example, the data subject can subscribe to the news feeds posted on the Facebook wall by clicking on the "like" link on the Facebook page, and thereby consent to the publication of the Controller's news and offers on his/her own wall, and unsubscribe by clicking on the "dislike" link on the same wall, and delete unwanted news feeds on the wall by using the settings on the wall.

Who is affected

Natural persons who voluntarily follow, share or like the social networking sites of the Data Controller, in particular <https://www.facebook.com/fibulahotel/> or the content published on it.

Duration of data processing

Until the data subject unsubscribes or, upon request, deletes it.



4.11. Completion of a request for tenders

Purpose of data processing

By storing the data provided in the course of fulfilling the request, the Data Controller can provide a more accurate service. The purpose of data processing is to prepare the offer requested by the Data Subject, to carry out the necessary surveys and investigations

Scope of data processed and detailed purposes of data processing

- Full name: identification, contact.
- E-mail address: identification, contact.
- Telephone number: for communication between the Data Controller and the Data Subject.

Legal basis for processing

In the case of an offer made in the context of a contract, performance of a contract (Article 6(1)(b) GDPR), in the case of a pre-contractual offer to a contact person, legitimate interest (Article 6(1)(f) GDPR).

Designation of legitimate interest

Proper information about business opportunities to the Customer or its contact person is essential for the success of the offer. Liaising with the applicant.

Categories of persons concerned

Contact persons of the contracting authority natural persons, legal persons

Duration of data processing

Personal data will be deleted within 30 days after the expiry of the period of the offer. In the event of an order, the contractual relationship will be processed as described in the relevant points.

4.12. Data processing related to contracting with partners

M-R Belvárosi Lakópark Kft. commissions various partners to carry out certain tasks and subtasks in order to ensure the appropriate quality of its activities.

Purpose of data processing

The purpose of the processing is the conclusion of ad hoc contracts or framework agreements with a legal or natural person contracted to perform a task or sub-task.

Scope of data processed and detailed purposes of data processing

- Last name of personal contributor: identification, contact,
- First name of personal contributor: identification, contact,



- Photograph: required for the performance of the contract (in case of a contract specifically for photography)
- E-mail address: identification, contact,
- Telephone number: for contact purposes,
- Legal entity details (name, registered office, company registration number, tax number): to fulfil the contract
- Contact details: identification, contact details,
- Signature: authentication, identification.

Legal basis for data processing

The legal basis for processing is the performance of a contract (Article 6(1)(b) GDPR).

Duration of data processing

After the termination of the relationship with the Data Subject, the data shall be processed in accordance with the provisions of the Civil Code. 6:22 of the Personal Data Protection Act, we will delete the data after 2 years. If we are obliged to retain the data pursuant to Section 169 of Act C of 2000 on Accounting ("Accounting Act"), we will delete the data after 8 years following the termination of the relationship with the Data Subject. In practice, this is the case if the data is part of the supporting accounting documents, such as the documents relating to the conclusion of the contract (the contract itself, where applicable) or the invoice issued.

4.13. Entering vehicle data

Purpose of data processing

The registered Data Subject has the possibility to provide the details of his/her vehicle, for example, in connection with the provision of a parking space, access to private property, etc.

Legal basis for data processing

Consent of the Data Subject (Article 6(1)(a) GDPR) or performance of a contract (Article 6(1)(b) GDPR), if the vehicle's entry or arrival is related to a contractual obligation.

The scope of the data processed and the detailed purposes of the processing

The details of the Data Subject's driving document:

- Full name: identification, contact, claims
- Date of birth: identification, claims
- Address: identification, contact, claim
- Driving licence number: validation
- Date of expiry of driving licence: identification, enforcement

The details of the registered Data Subject's vehicle:

- manufacturer: identification
- type: identification



- year: identification
- engine: identification
- registration number: identification

Duration of data processing

In the case of consent given by the Data Subject, the personal data will be deleted until it is withdrawn or at the latest 2 years after the consent was given. The Data Subjects may withdraw their consent at any time and request the deletion of their personal data by sending a letter by post to the address at 9 Teréz u., 7621 Pécs, Hungary, or by sending an electronic message to the address sales@fibulahotel.hu.

In the case of the performance of a contractual obligation, the data shall be processed after the termination of the relationship with the Data Subject in accordance with the provisions of the Civil Code. 6:22 of the Personal Data Protection Act. If we are obliged to keep the data pursuant to Section 169 of Act C of 2000 on Accounting ("Accounting Act"), we will delete the data 8 years after the relationship with the Data Subject has ended. In practice, this is the case where the data is part of the supporting accounting documents, such as the documents relating to the conclusion of the contract (the contract itself, where applicable) or the invoice issued.

4.14. Order a product or service, fulfil an order

Purpose of data processing

In the case of an order for a product or service, the purpose of the processing is to enable the Data Subject (or his or her personal representative) to receive the ordered goods or services. If the contractor wishes to provide personal data of other Data Subject(s) in the course of providing the service, it must provide a separate declaration regarding the provision of the data.

Scope of data processed and detailed purposes of data processing

- Full name: identification, contact, claims
- E-mail address: identification, contact
- Telephone number: identification, contact
- Company name: forms the basis of the reseller contract, for identification, contract performance, invoicing and communication between the Data Controller and the Data Subject
- Name of the authorised representative or contact person: identification, contact, claims
- Telephone number of the authorised representative or contact person: contact,
- E-mail address of the authorised representative/contact person: identification, contact, claims
- Invoicing address: forms the basis of the resale contract, serves the purpose of performance of the contract and invoicing
- Other data related to performance: basis of the resale contract, necessary for the performance of the contract.



Legal basis for data processing

The legal basis for the processing is the performance of a contractual obligation (Article 6(1)(b) GDPR), the performance of a legal obligation in relation to invoicing (Article 6(1)(c) GDPR), and during the limitation period: legitimate interest (Article 6(1)(f) GDPR). The processing of data belonging to other possible beneficiaries of the order is governed by Section 13/A (1) of the Act on the Protection of the Rights of Third Parties (CVIII of 2001) and Section 13/A (3) of the Act on the Protection of the Rights of Third Parties (CVIII of 2001), and the related claims are governed by Section 6:11 (1) of the Civil Code and Section 6:11 (1) of the Civil Code. 6:14 § (1) of the Civil Code.

Designation of legitimate interest

Informing the customer about the order or the performance of the contract, or the performance of the contract itself. Enforcement of claims during the limitation period.

Categories of people concerned

Natural persons who have a customer relationship with the controller, natural person contact persons of legal person customers

Duration of data processing

After the termination of the relationship with the Data Subject, the data shall be processed in accordance with the provisions of the Civil Code. 6:22 of the Personal Data Protection Act, we will delete the data after 2 years. If we are obliged to keep the data pursuant to Section 169 of Act C of 2000 on Accounting ("Accounting Act"), we will delete the data after 8 years following the termination of the relationship with the Data Subject. In practice, this is the case where the data is part of the supporting accounting documents, such as the documents relating to the conclusion of the contract (the contract itself, where applicable) or the invoice issued. The data of other persons provided by the Customer will be processed only for as long as necessary for the provision of the service, while the declaration on the processing of personal data provided by the Customer in relation to other persons will be processed after the termination of the relationship with the Data Subject in accordance with the provisions of the Civil Code. 6:22 of the Personal Data Protection Act, we will delete it after 5 years.

4.15. Recording an error report

Purpose of data processing

If the Data Subject detects an error during registration or when ordering from the website, he/she has the possibility to report the error via the electronic system.

Legal basis for processing

The data subject's consent (Article 6(1)(a) GDPR) or, in the case of a registered applicant, the fulfilment of a contractual obligation (Article 6(1)(b) GDPR),

The scope of the data processed and the detailed purposes of the processing



The Affected Person:

- Full name: identification, contact, claims
- E-mail address: identification, contact,
- Telephone number: identification, contact,
- Company name: contract performance, identification, contact,
- Name of the authorised representative or contact person: identification, contact, enforcement
- Telephone number of the authorised representative or contact person: contact,
- E-mail address of the authorised representative/contact person: identification, contact, claims
- Invoicing address: forms the basis of the resale contract, serves the purpose of performance of the contract and invoicing.
- content of the error report: fulfilment of contractual obligations

Duration of data processing

In the case of consent given by the Data Subject, the personal data will be deleted until it is withdrawn or, in the absence of withdrawal, 30 days after the error has been corrected. The Data Subjects may withdraw their consent at any time and request the deletion of their personal data by sending a letter by post to the address at 9 Teréz u., 7621 Pécs, Hungary, or by sending an electronic message to the address info@fibulahotel.hu.

After the termination of the relationship with the Data Subject, the data shall be processed in accordance with the provisions of the Civil Code. 6:22 of the Personal Data Protection Act, we will delete the data after 2 years. We will keep the data for a longer period if required by law, for example, if we are obliged to keep the data under Section 169 of Act C of 2000 on Accounting ("Accounting Act"), we will delete the data after 8 years following the termination of the relationship with the Data Subject. In practice, this is the case if the data is part of the supporting accounting documents, for example, in the documents relating to the conclusion of the contract (the contract itself, where applicable) or the invoice issued, or for 6 years in the case of a police report.

4.16. Data management in relation to complaint handling

Purpose of data processing

The Data Subject may lodge a complaint about the service provided by the Data Controller.

Scope of data processed and detailed purposes of data processing

- Full name: identification, contact, claims
- E-mail address: identification, contact,
- Telephone number: identification, contact,
- Company name: contract performance, identification, contact
- Name of the authorised representative or contact person: identification, contact, enforcement
- Telephone number of the authorised representative or contact person: contact,
- E-mail address of the authorised representative/contact person: identification, contact, claims
- Content of complaint: identification, contact details



Legal basis for data processing

The legal basis for data processing is Article 17/A (7) of Act CLV of 1997 on Consumer Protection.

Duration of data processing

The Data Controller shall keep the personal data for 5 years from the date of the complaint.

4.17. Data processing in relation to evaluation

Purpose of data processing

The Data Subject has the opportunity to provide feedback on the service. The evaluation can be completed anonymously, i.e. only for the evaluation.

Scope of data processed and detailed purposes of data processing

- Surname: necessary for identification, communication
- First name: necessary for identification, communication
- E-mail address: required for identification and communication
- Date of assessment: for identification, statistical purposes
- Evaluation: satisfaction measurement, statistical purpose

Legal basis for processing

The legal basis for processing is the data subject's consent (Article 6(1)(a) GDPR).

Duration of data processing

The Controller shall retain the personal data until the Data Subject's consent is withdrawn. The Data Subjects may withdraw their consent at any time and request the deletion of their personal data by sending a letter by post to the address 9 Teréz u., 7621 Pécs, Hungary, or by sending an electronic message to the address info@fibulahotel.hu.

4.18. Processing of data relating to found objects

Purpose of data processing

Administration of objects found on the premises of the hotel operated by the Data Controller or at events organised and supervised by it, notification of the presumed owner or the finder.

Scope of data processed and detailed purposes of data processing

- the date of finding,
- the place of discovery,
- the name of the finder,
- contact details of the finder,
- details of the object found
- personal data of the owner/receiver of the found object.



Legal basis for data processing

§ 5:54, § 5:55, § 5:59 and § 5:61 of Act V of 2013 on the Civil Code.

Duration of data processing

For a period specified by law, up to 1 year after the object is found.

4.19. Recruitment, receiving applications for employment

Purpose of data processing

The Data Controller provides the opportunity for the Data Subject to apply for the job advertised by the Data Controller.

Scope of data processed and detailed purposes of data processing

- Surname: identification, contact
- First name: identification, contact
- E-mail address: identification, contact
- Personal data provided voluntarily: may be necessary to select the right person for the position
- Personal data voluntarily provided in any document attached to the CV: may be necessary for the selection of the person suitable for the position.

Legal basis for data processing

The legal basis for processing is the data subject's consent (Article 6(1)(a) GDPR).

Duration of data processing

Following the selection of a suitable person for the vacant position, the Data Controller will inform the other applicants concerned that the employer has not selected them for the position in question and will request their explicit and voluntary consent in writing to the retention of their CV and other related documents containing personal data. The purpose of the processing is to enable the Data Subject to participate in future job applications of the Controller in a simplified manner. The Data Subject's explicit consent allows the processing of his/her personal data for a period of 5 years, after which the data will be deleted.

If the Data Subject does not consent to the retention of his or her application material or personal data, the data will be deleted within 30 days and CVs will be destroyed.

The Data Subjects may withdraw their consent at any time and request the deletion of their personal data by sending a letter by post to the address 9 Teréz u., 7621 Pécs, Hungary, or electronically by sending a message to the address sales@fibulahotel.hu. The Controller will comply with the request if the requested operation is reasonably practicable.

4.20. Organising and documenting events, informing the public



Purpose of data processing

Taking photos and videos of public events and publishing them on the organisation's public platforms and in the press.

Scope of the data processed

- Participant name: identification, if participation is subject to registration, contact
- Participant's e-mail address: identification, if participation is subject to registration, contact
- Photograph, with picture of the Participant: to document the event
- Video recording, with the image of the Data Subject: documentation of the event

Legal basis for data processing

Legitimate interest (Article 6(1)(e) GDPR) or the data subject's consent (Article 6(1)(a) GDPR), if participation in the event is subject to registration.

Duration of data processing

If the Data Controller has linked the personal data to the registration at the event, it will retain the processed data until the Data Subject's consent is withdrawn. The Data Subjects may withdraw their consent at any time and request the deletion of their personal data by sending a letter by post to the address 9 Teréz u., 7621 Pécs, Hungary, or electronically by sending a message to the address info@fibulahotel.hu. The Controller will comply with the request if the requested operation is reasonably practicable.

4.21. Data processing for event-related requests for proposals and orders

Purpose of data processing

The Data Subject (personal contributor of a legal person) has the possibility to request an offer from the Data Controller to organise an event and to order the appropriate content from the Data Controller.

Scope of data processed and detailed purposes of data processing

- Surname: identification, communication, contract performance
- First name: identification, communication, contract performance
- Company name: identification, communication, performance of contract
- Name of personal contributor: identification, communication, performance of contract
- Telephone number: identification, communication, performance of contract
- E-mail address: identification, communication, performance of contract
- Programme: execution of contract
- Meal request: fulfil contract
- Date of event: fulfilment of contract
- Comment: fulfilment of contract
- Number of people: fulfil contract
- Contract value: performance of contract



- Other performance conditions: performance of contract

Legal basis for data processing

The legal basis for the processing is the performance of a contract (Article 6(1)(b) GDPR), the fulfilment of a legal obligation in relation to invoicing (Article 6(1)(c) GDPR) and the legitimate interest of the Controller (Article 6(1)(f) GDPR).

Designation of legitimate interest

Providing the customer with appropriate information through the contact person in case of contact. The execution of the request is in the joint business interest of the Data Controller and the requesting party. In the correspondence, the information of the Data Subject's requestor about the processing is already provided in the first reply. During the limitation period, the data are necessary for the purposes of any claims.

Duration of data processing

If the offer is accepted by the Data Subject, the data will be stored after the termination of the relationship with the Data Subject in accordance with the provisions of the Civil Code. 6:22 of the Privacy Act, we will delete the data after 5 years. If we are obliged to retain the data pursuant to Section 169 of Act C of 2000 on Accounting ("Accounting Act"), the data will be deleted 8 years after the termination of the relationship with the Data Subject. In practice, this is the case if the data is part of the supporting accounting documents, such as the documents relating to the conclusion of the contract (the contract itself, where applicable) or the invoice issued.

If the offer is not accepted by the Data Subject, the Data Controller will store the data for legitimate reasons - the direct business interest of keeping the partners' previous offers - and delete them within 5 years.

4.22. Data processing related to contracting with partners

Purpose of data processing

The Data Controller contracts with various partners to provide its services and to ensure the provision of services.

Scope of data processed and detailed purposes of data processing

- Full name: identification, contact, claims
- E-mail address: identification, contact,
- Telephone number: identification, contact,
- Company name: contract performance, identification, contact,
- Name of the authorised representative or contact person: identification, contact, enforcement
- Telephone number of the authorised representative or contact person: contact,
- E-mail address of the authorised representative/contact person: identification, contact, claims



- Photo: required for the performance of the contract (in case of a contract specifically for photography),
- Data relating to the legal person (name, registered office, company registration number, tax number): performance of the contract.

Legal basis for processing

The legal basis for processing is the performance of a contract (Article 6(1)(b) GDPR).

Duration of data processing

After the termination of the relationship with the Data Subject, the data shall be processed in accordance with the provisions of the Civil Code. 6:22 of the Personal Data Protection Act, we will delete the data after 5 years. If we are obliged to retain the data pursuant to Section 169 of Act C of 2000 on Accounting ("Accounting Act"), we will delete the data after 8 years following the termination of the relationship with the Data Subject. In practice, this is the case if the data is part of the supporting accounting documents, such as the documents relating to the conclusion of the contract (the contract itself, where applicable) or the invoice issued.

4.23. Sending messages, newsletters, DM activity, telephone enquiries

M-R Belvárosi Lakópark Kft. (Fibula Residence Hotel & Wellness *****) sends a newsletter to the natural persons who subscribe to the newsletter, as well as to the natural persons of its customers and the natural persons of its legal entity customers.

Purpose of data processing

The Data Controller sends promotional materials to subscribers by post, sends newsletters, circulars and individual messages in the form of direct electronic messages, and sends information by telephone, for example, about its activities, events, campaigns, membership and support opportunities to Data Subjects who have subscribed to the list and provided their e-mail address and telephone number.

The Data Subject may unsubscribe from receiving the offers, without restriction and without giving any reason, free of charge, by clicking on the "unsubscribe" icon in the newsletter or by sending a message to info@fibulahotel.hu. In this case, all personal data necessary for sending the newsletter will be deleted from our records and the Data Subject will not be contacted by further correspondence.

Scope of data processed and Purpose of data processing

- Surname: identification, contact
- First name: identification, contact
- Postal address: identification, contact
- Email address: identification, contact
- Phone number: identification, contact

Legal basis for data processing

Legitimate interest of the controller where there is a customer relationship, consent of the data subject in other cases (Article 6(1)(a) GDPR).



Designation of legitimate interest

Direct marketing and information requests are processing based on legitimate interest.

Categories of people affected

Natural person customers of the controller, natural persons subscribing to the newsletter, natural person contacts of legal persons.

Duration of data processing

The Controller deletes the personal data from its database after the Data Subject unsubscribes from the newsletter.

4.24. Processing of bank card data:

Purpose of data processing

In the case of payment by credit card, the Data Subject is required to provide this information in order to ensure the financial performance of the service.

In the case of online payment transactions, part of the data is transferred to the Data Controller by each partner.

Scope of data processed and detailed purposes of data processing

- Name on bank card: identification, contact,
- Bank card number: identification,
- Bank card expiry date: identification.

Legal basis for data processing

The legal basis for processing is the performance of a contract (Article 6(1)(b) GDPR).

Duration of data processing

The Data Controller processes personal data for 8 calendar days after the departure of the data subject.

4.25. Processing of data related to camera surveillance

The hotel operates a closed-circuit camera system in the building and its exterior (street) and interior (courtyard) surroundings, which continuously records and records 24 hours a day, for the safety of guests and hotel property and staff.

Purpose of data processing

For the purposes of the protection of persons and property, the Data Controller carries out camera surveillance on its premises.



Scope of data processed and detailed purposes of data processing

Portrait: personal and property protection

4.26. Purchase of equipment and services

Purpose of data processing

Purchase and order the necessary equipment, tools and related services.

Legal basis for data processing

Performance of a contract, in the case of invoicing, performance of a legal obligation, during the limitation period or in the course of contacts: legitimate interest.

Designation of legitimate interest

Providing the customer with appropriate information through the contact person in case of contact. Enforcement during the limitation period.

Categories of people affected

Data of natural persons who have a contractual relationship with the data controller, natural persons who are the contact persons of the legal person's customers, and data of the intermediaries carrying out the transport and installation.

Categories of personal data

- Full name: identification, contact, claims
- E-mail address: identification, contact,
- Telephone number: identification, contact,
- Company name: contract performance, identification, contact,
- Name of the authorised representative or contact person: identification, contact, enforcement
- Telephone number of the authorised representative or contact person: contact,
- E-mail address of the authorised representative or contact person: identification, contact, claims

Duration of storage

The duration of the contract and the civil limitation period thereafter (last day of the 5th year). For invoices, 31 December of the 8th year following the date of issue of the invoice. In relation to invoice data, the legal obligation is based on §§ 159, 169 of Act CXXVII of 2007, §§ 166-169 of Act C of 2000.

5. DATA CONTROLLERS, DATA PORTABILITY

In connection with certain legal obligations and tasks, the Data Controller transfers the Data Subject's data to other Data Controllers and uses data processors to perform certain sub-tasks.



5.1. Data processing

The rights and obligations of the data processor in relation to the processing of personal data are determined by the Data Controller within the framework of the GDPR and the specific laws applicable to data processing. The Controller shall be responsible for the lawfulness of the instructions given by it. The processor shall not take any substantive decision regarding the processing, shall process personal data of which it becomes aware only in accordance with the Controller's instructions, shall not process personal data for its own purposes and shall store and retain personal data in accordance with the Controller's instructions.

6. DATA SECURITY MEASURES

The Data Controller shall act with regard to the personal data provided by the Data Subject in compliance with the provisions of "Regulation 2016/679 of the European Parliament" and "Act CXII of 2011 on the Right to Information Self-Determination and Freedom of Information".

The Data Controller shall take all measures reasonably necessary to ensure the security of the data, and shall ensure an adequate level of protection, in particular against unauthorised access, alteration, disclosure, erasure or destruction, accidental destruction or accidental damage.

Please help us to protect your information by not using an overly obvious login name or password and by changing your password regularly, and please do not disclose your password to anyone else.

7. DATA SUBJECTS' RIGHTS IN RELATION TO DATA PROCESSING

The Data Subject's data protection rights and remedies, and the relevant provisions and limitations of the GDPR in this regard, are set out in detail in the GDPR (in particular Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). The most important provisions are summarised below.

7.1. The Data Subject's right of access

You have the right to receive feedback from us on whether your personal data is being processed. If such processing is ongoing, the Data Subject is entitled to access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data of the Data Subject;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations;
- where applicable, the envisaged duration of the storage of the personal data or, where this is not possible, the criteria for determining that duration;
- the Data Subject's right to request us to rectify, erase or restrict the processing of personal data relating to the Data Subject and to object to the processing of such personal data;
- the right to lodge a complaint with a supervisory authority; and
- where the data has not been collected from the Data Subject, any available information about its source;
- the fact that automated decision-making, including profiling, is taking place and, at least in these cases, the logic used and clear information about the significance of such processing and the likely consequences for the Data Subject.



If personal data are transferred to a third country, the Data Subject has the right to be informed of the appropriate safeguards regarding the transfer.

We will provide the Data Subject with a copy of the personal data processed. If the Data Subject has made the request by electronic means, the information shall be provided in a commonly used electronic format, unless the Data Subject requests otherwise.

7.2. The right to rectification

The Data Subject has the right to have inaccurate personal data relating to him or her corrected without undue delay upon his or her request. The Data Subject shall have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

7.3. Right to erasure ("right to be forgotten")

The Data Subject has the right to obtain, at his or her request and without undue delay, the erasure of personal data relating to him or her where one of the following grounds applies:

- the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the data subject withdraws the consent on the basis of which the processing was carried out and there is no other legal basis for the processing;
- the Data Subject objects to the processing and, where applicable, there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data must be erased in order to comply with a legal obligation under EU or Member State law applicable to us; or
- the personal data was collected in connection with the provision of information society services.
- If the Controller has disclosed the personal data and is required to delete it pursuant to paragraph 7.3.1, it will take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform other controllers who also hold or publish the data that the Data Subject has requested them to delete the links to or copies or replicas of the personal data in question.
- The above shall not apply where the processing is necessary, inter alia:
 - for the exercise of the right to freedom of expression and information;
 - to comply with an obligation under EU or Member State law that requires the processing of personal data that is applicable to us;
 - for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where the right referred to in paragraph 7.3.1 would be likely to render such processing impossible or seriously jeopardise it; or
 - for the establishment, exercise or defence of legal claims.

7.4. Right to restriction of processing

The Data Subject has the right to restrict processing at his or her request if one of the following conditions is met:



- the Data Subject contests the accuracy of the personal data, in which case the restriction applies for the period of time that allows us to verify the accuracy of the personal data;
- the processing is unlawful and the Data Subject opposes the erasure of the data and requests instead the restriction of their use;
- we no longer need 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 shall apply for a period of time until it is determined whether the legitimate grounds of the Controller prevail over the legitimate grounds of the Data Subject.

If processing is restricted pursuant to paragraph 7.4.1, such personal data may be processed, except for storage, only with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

The Data Subject will be informed in advance of the lifting of the restriction on processing.

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

The Controller will 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. We will inform you of these recipients at the request of the Data Subject.

7.6. Right to data portability

The Data Subject has the right to receive the personal data concerning the Data Subject that he or she has provided to us in a structured, commonly used, machine-readable format and the right to transmit such data to another controller without hindrance from the Controller, if:

- the processing is based on consent or a contract; and
- the processing is carried out by automated means.

In exercising the right to data portability under paragraph 7.6.1, the Data Subject has the right to request, where technically feasible, the direct transfer of personal data between controllers.

7.7. The right to protest

The Data Subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of his or her personal data based on legitimate interests, including profiling. In such a case, the personal data will no longer be processed unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the Data Subject has the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing.



If the Data Subject objects to the processing of personal data for direct marketing purposes, the personal data may no longer be processed for these purposes.

In relation to the use of information society services and by way of derogation from Directive 2002/58/EC, the Data Subject may exercise the right to object by automated means based on technical specifications.

Where personal data are processed for scientific or historical research purposes or for statistical purposes, the Data Subject shall have the right to object, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.8. Right to complain to the supervisory authority

The Data Subject may assert his/her rights before the courts under the GDPR and the Civil Code, and may also contact the National Authority for Data Protection and Freedom of Information (NAIH) (1125 Budapest, Szilágyi Erzsébet fasor 22/C; postal address: 1530 Budapest, Pf. 5; phone: +36 1 391 1400; e-mail: ugyfelszolgalat@naih.hu) in case of complaints about the data controller's data management practices. Detailed rights and remedies in relation to data processing are set out in Articles 77, 79 and 82 of the GDPR.

7.9. Right to an effective judicial remedy against the supervisory authority

The Data Subject shall have the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning the Data Subject.

The Data Subject has the right to an effective judicial remedy if the competent supervisory authority does not deal with the complaint or does not inform the Data Subject within three months of the procedural developments or the outcome of the complaint.

Proceedings against the supervisory authority shall be brought before the courts of the Member State in which the supervisory authority is established.

7.10. The right to an effective judicial remedy against the controller or processor

The Data Subject has an effective judicial remedy if he or she considers that his or her rights under the GDPR have been infringed as a result of the processing of his or her personal data in a way that does not comply with the GDPR.

Proceedings against the controller or processor shall be brought before the courts of the Member State in which the controller or processor is established. Such proceedings may also be brought before the courts of the Member State where the Data Subject has his or her habitual residence.

It is recommended to send the complaint to the controller before initiating any procedure.



8. INFORMATION ABOUT CHILDREN

Persons under the age of 16 may not provide personal information about themselves unless they have asked a parent or guardian for permission. We will not process the data of persons under the age of 16 or will process it anonymously if the consent of a legal representative, parent, guardian or custodian is not available.

In the case of Data Subjects under the age of 14, their legal representative or guardian may provide personal data or make a declaration on their behalf.

The Data Subject who is over the age of 14 but under the age of 18 may provide personal data and make a legal declaration only with the consent of his/her legal representative or guardian.

By providing the information, you represent and warrant that you will act in accordance with the foregoing and that you have no legal capacity to act in relation to the provision of the information. If you do not have the legal capacity to provide the information, you must obtain the consent of a third party (e.g. legal representative, guardian). In this context, you must consider whether the consent of a third party is required in connection with the provision of the information. The Data Controller may not have any personal contact with you, so you are responsible for ensuring compliance with this point and the Data Controller shall not be liable in this regard.

The Data Controller does not process personal data of persons under the age of 16 in connection with its business activities. The Data Controller does not have sophisticated methods to verify the eligibility, the real age or the authenticity of the consent of the person giving the consent, so the user or the person having parental control over the user guarantees that the consent is in accordance with the law. In the absence of consent, the controller will not collect personal data relating to a data subject under the age of 16.

We will use all reasonable endeavours to detect any instances where minors' data have been unlawfully disclosed to us, in which case we will promptly ensure that the data are deleted.

Please let us know if you find that a child has provided information about him or herself without your consent. You can contact us using the contact details highlighted at the beginning of this Notice.

9. TRANSFERS TO COUNTRIES OUTSIDE THE EGT AND GUARANTEES

The Data Controller does not transfer data to other countries or regions outside the European Union in any way.

10. ANALYTICS SERVICES, COOKIES

The Data Controller uses cookies and tracking codes of external service providers (in particular: Google, Facebook) to monitor user interest, demographic data and behaviour on the website. The data collected is not used for profiling purposes, is not used for automated decision-making, is collected for statistical purposes and is analysed to improve its services.



In addition, the Data Controller may use aggregate data obtained from interest-based advertising services or audience data (such as age, gender and interests) for general website reporting and development and for advertising on marketing lists.

The aim of the above is to continuously improve our websites and increase the effectiveness of our websites and the advertising associated with our campaigns.

10.1. Google Analytics

Independent measurement and auditing of the website's traffic and other web analytics data is facilitated by external service providers (for details, please visit: google.com/analytics/).

On the Ads Settings page, made available by Google, you can disable Google Analytics for Display ads and customise your Google Display Network ads. All tracking by Google Analytics can be disabled using the browser module.

10.2. Facebook remarketing

We also use the Facebook remarketing code to display targeted ads. If you don't want to see ads based on page views and interests, you can turn this feature off.

10.3. Cookie-k

A small information pack consisting of letters and numbers. The cookie is automatically sent by the web server to the visitor's browser when the website is visited for the first time. The cookie is stored on the visitor's computer or mobile device for a period of time determined by the person who placed the cookie.

The browser will return the cookie to the web server the next time you visit the website. The web server can use the data sent to identify the computer or mobile device that sent the cookie and can combine the cookies sent by that device. The cookie provides the web server with information about the activity between visits to the website. A web beacon is a small, usually unnoticeable, image placed on a website. By placing a web beacon, the visitor's actions on the website can be tracked and statistics can be generated from the data obtained.

The M-R Belvárosi Lakópark Kft. places cookies and web beacons on the website in order to recognize a person who has visited the website before; to map the visitor's interests; to improve the visitor's user experience and to display personalized advertisements to the visitor and to improve the security of the website.

The website of the Data Controller <https://fibulahotel.hu/> is supported by the following cookies:

- They are necessary cookies for the basic functioning of the site;
- Functional cookies are used to remember user preferences;
- Performance cookies
- Used to identify the shopping cart and products in the online store, and the registered customer, to improve the performance of the website and thus help provide a more complete user experience.



- We inform our users that the use of cookies operated by our website requires the prior informed consent of the user pursuant to Section 155 (4) of Act C of 2003 on Electronic Communications ("Eht."). Therefore, on the first visit to the website, a notice will pop up at the bottom of the screen informing you that the website uses cookies and a link to this information. The user can consent to the use of cookies by clicking on the "I accept" button.
- For more information on the use of cookies, please visit allaboutcookies.org - including detailed instructions on how to delete cookies from your computer. For information on deleting cookies from your mobile phone, please refer to your device manual.
- By using this site, you agree to the use of technical data and cookies as described above. It is important to note that these cannot be used on their own to identify you, and will be deleted after you leave the site in accordance with your browser settings.
- The cookies used on this website do not store personally identifiable information.
- If you still do not wish to receive certain types of cookies, you can configure your browser to prevent the setting of a unique identifier or to warn you if the website wishes to send you a cookie.

If you have any queries or problems, please contact us by post at M-R Belvárosi Lakópark Kft, 1134 Budapest Váci út 47/B Ü-1. or electronically at sales@fibulahotel.hu and we will endeavour to respond promptly and fulfil your request as soon as possible. If you are still not satisfied or feel that you have suffered a violation of your rights in relation to the processing of your personal data, you can also turn to the competent court, the Metropolitan Court of Budapest or initiate an investigation at the National Authority for Data Protection and Freedom of Information.

For further information please contact our hotel!

www.fibulahotel.hu

+36 30 327 3111

+36 72 954 193

info@fibulahotel.hu



FIBULA

RESIDENCE HOTEL & WELLNESS

