General Data Management Policy

*In order to comply with the legal obligations set forth in 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 Directive 95/46/EC (hereinafter: the "Regulation"), as well as in Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information, our accommodation (**Újhuta Kastélyszálló**) has prepared the following Data Management Notice:*

PURPOSE OF THE DATA MANAGEMENT NOTICE

Újhuta Kastélyszálló (hereinafter: the "Accommodation") has drafted and published a *Data Management Policy* to ensure that owners, employees, partners, clients, guests, and visitors are informed about the scope of data processed by the Accommodation, as well as the legal relationships and the specific contexts in which such data processing occurs. Natural persons whose data is processed by the Accommodation should be aware of which of their data is subject to processing, the legal basis for such processing, the duration of data storage, whether any data transfers, automated decision-making, or profiling take place, and what rights the data subjects possess.

In addition to this internal policy, the Accommodation Provider also makes a Data Management Policy available on its website. The internal data management policy can be found at the Accommodation Provider's headquarters, in the central office.

ACCOMMODATION OVERVIEW

Name	**Újhuta Kastélyszálló**
Address	**3936 Háromhuta, Kossuth street 2.**
E-mail address	**recepcio@ujhutakastelyszallo.hu**
Phone	**+36 30 1774340**
Website	**www.ujhutakastelyszallo.hu**
Operator	**FÉMALK Zrt.**

Location
The accommodation is a castle-style property located in Újhuta, offering 21 rooms for its guests.

Since the end of October 2018, the property has welcomed guests looking to escape the rush of everyday life and the noise of the city. The Castle is situated within the Zemplén Landscape Protection Area, ensuring that the presence of nature is a constant feature throughout one's stay.

Rooms
The total capacity of the accommodation is 48 guests, comprising 3 four-person suites, 7 standard double rooms, and 11 double attic rooms.

Services
- accommodation: 3 quadruple suites, 7 double standard rooms, 11 double attic rooms,

- dining: The castle hotel's restaurant welcomes guests with the flavours of the Zemplén region and high-quality wines from the Tokaj-Hegyalja historical wine region—a site recognized as a World Heritage treasure.
- wellness area: within the wellness section of the castle hotel, a 120 cm-deep pool with an overflow edge, a spacious Finnish sauna, and a 7-person hot tub are available for physical and mental rejuvenation.

- conference room: In the west wing of the castle hotel, instead of the one on the ground floor, there is a conference room equipped with the most modern audiovisual technology. The room is suitable for holding conferences, trainings, team building, organization development workshops or business negotiations, with a maximum capacity of 50 people. It can also be booked for external persons, not just guests.

- family events: Catering—including food and beverages tailored to specific requirements—is provided in the castle hotel's restaurant. Table reservations are also available to non-guests.

The accommodation provider's website features a "Programs" section detailing local activities; however, the accommodation provider does not organize programs directly for guests, and therefore no data processing operations related to the organization of programs take place.

Guests may make bookings via Booking.com and Szállás.hu, as well as directly through the Kastélyszálló website. Data processing on Booking.com and Szállás.hu is governed by the respective privacy policies of these third-party platforms.

A booking confirmation will be sent directly to the guest's email address.

DATA CONTROLLER

The Accommodation informs the data subjects that, with regard to data processing, the operators of the Accommodation act as the data controllers, as the Újhuta Kastélyszálló establishment itself is not a separate legal entity.

A data controller is a person or organization that determines the purpose of data processing, makes and implements decisions regarding the processing (including the tools used), or has such decisions implemented by a data processor commissioned by them.

Company Name (the Data Controller)	Fémalk Zrt.
Registered Office	1211 Budapest, Öntöde street 2-12
Company registration number	01-10-044879
Tax number	12963409-2-44
Representative	Karlheinz Braisch
E-mail address	karlheinz.braisch@femalk.hu
Website	www.femalk.hu

SCOPE OF THE POLICY

Temporal scope: effective from 15 October 2026 until revoked.

Personal scope:

- Data Controller,
- those persons whose data are contained in data processing operations falling within the scope of this Policy,
- to those persons whose rights or legitimate interests are affected by the data processing.

Territorial Scope: This Policy applies to the Accommodation and to all properties associated with the Accommodation where the Data Controller carries out data processing activities.

Material Scope: This Policy applies to all data processing activities and data containing personal data that occur within any organizational unit of the Data Controller in the course of operating the Accommodation.

LEGISLATION GOVERNING DATA PROCESSING

- 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 (GDPR)
- Act V of 2013 on the Civil Code (Civil Code)
- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Info.tv.)
- CXXXIII of 2005 Act on the Protection of Persons and Assets, as well as the Rules for the Activities of Private Investigators (Act on Personal and Property Protection)
- Act I of 2012 on the Labour Code (LC)
- Act CLV of 1997 on Consumer Protection
- Act CXIX of 1995 on the Processing of Name and Address Data for the Purposes of Research and Direct Marketing (law on direct marketing)
- 235/2019 on the implementation of the Act on State Tasks for the Development of Tourist Areas. (X. 15.) Government decree
- Act CLVI of 2016 on the State Tasks Regarding the Development of Tourism Regions
- CLXXXIX of 2011 on the local governments of Hungary law

PRINCIPLES OF DATA PROCESSING

In the course of its data processing activities, the Accommodation Provider adheres to the fundamental principles prescribed by both the Regulation and the Info. Act, including:

- lawfulness, fairness and transparency,
- purpose-bound nature,
- data saving,
- accuracy,
- limited shelf life,
- integrity and confidentiality,
- accountability.

We provide information below regarding the content and meaning of the principles listed above:

The Accommodation Provider processes data lawfully, fairly, and in a transparent manner in relation to the data subject (lawfulness, fairness, and transparency).

The Accommodation Provider collects personal data only for specified, explicit, and legitimate purposes, and does not process them in a manner incompatible with these purposes (purpose limitation).

The Accommodation Provider carries out data processing in a manner that is adequate, relevant, and limited to what is necessary for the purpose(s) of the processing (data minimization). Accordingly, the Accommodation Provider does not collect or store more data than is strictly necessary to achieve the purpose of the data processing.

The Accommodation Provider's data processing is accurate and up-to-date. The Accommodation Provider takes all reasonable measures to ensure that personal data which are inaccurate in relation to the purposes for which they are processed are erased or rectified without delay (accuracy).

The Accommodation Provider stores personal data in a form that permits the identification of the data subjects only for as long as is necessary for the purposes for which the personal data are processed, taking into account the storage obligations stipulated by applicable legislation (storage limitation).

The Accommodation Provider ensures an appropriate level of security for personal data through the application of suitable technical or organizational measures, including protection against unauthorized or unlawful processing, as well as against accidental loss, destruction, or damage (integrity and confidentiality).

The Accommodation Provider is responsible for compliance with the principles detailed above and must demonstrate such compliance (accountability). Accordingly, the Accommodation Provider ensures the ongoing application of the provisions set out in these internal regulations, continuously reviews its data processing activities, and—where necessary—modifies or supplements its data processing procedures. The Accommodation Provider shall maintain documentation to demonstrate compliance with legal obligations.

LEGAL BASES FOR DATA PROCESSING

The Accommodation Provider informs the data subjects that data processing may only take place on the basis of the specific legal grounds enumerated in the Regulation and the Info.tv.; data processing without a legal basis is unlawful.

For each data processing activity, the Accommodation Provider informs the data subject of the legal basis upon which their data is processed.
The processing of personal data is lawful only if and to the extent that at least one of the listed legal bases is met:

- data processing based on consent,
- data processing based on a contract,
- data processing based on a legal obligation,

- data processing based on public authority powers,
- data processing based on legitimate interest.

The data subject has given consent to the processing of their personal data for one or more specific purposes.	hereinafter: *data processing based on consent*
The processing of data is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract.	hereinafter: *data processing based on a contract*
Data processing is necessary for the fulfillment of a legal obligation incumbent upon the accommodation provider.	hereinafter: *data processing based on a legal obligation*
The processing is necessary to protect the vital interests of the data subject or of another natural person.	hereinafter: *data processing based on a vital interest*
The data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the accommodation provider.	hereinafter: *data processing based on public authority powers*
The data processing is necessary for the purposes of the legitimate interests pursued by the accommodation provider or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child.	hereinafter: *data processing based on legitimate interest*

The Accommodation Provider always processes a specific set of personal data based on a single legal basis. The legal basis for the data processing may change during the course of the processing.

Legal basis for data processing activities carried out by the Accommodation Provider:

- data processing based on consent,
- data processing based on a contract,
- data processing based on a legal obligation.

BASIC CONCEPTS APPLICABLE DURING DATA PROCESSING

Data 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 such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Data Processing	any operation or set of operations which is performed on 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 by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
Data Processor	a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller
Personal data	any information relating to an identified or identifiable natural person (data subject); a natural person who can be identified directly or indirectly, in particular on the basis of an identifier such as a name, number, location data, online identifier or one or more factors relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person
Consent of the data subject	a freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her
Special category of data	personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic and biometric data for the purpose of uniquely identifying a natural person, data concerning health, personal data concerning a natural person's sex life or sexual orientation, and personal data relating to criminal convictions and offences;

IDENTIFICATION OF DATA PROCESSORS

The accommodation provider also engages data processors in the course of managing internal and external business operations.

A data processor is a natural or legal person, public authority, agency, or any other body which processes personal data on behalf of the controller.

The Company also expects data processors to comply with and apply the provisions of the Regulation and the Info.tv.

Our company's data processors:

- Hosting provider,
- National Tax Authority,
- Local government.

1. IT Service Providers

Website service provider, data processor

Service Provider	Aero Marketing Hungary Kft.
Registered Office	1075 Budapest, Asbóth street 14. 2/5.
Legal basis for data processing	Data processing based on a contract
Purpose of data processing	Website operation, support for marketing processes
Scope of affected parties	Hotel guests
Data	Information provided via the website and analytical data related to website visits
Method of data processing	Electronically
Duration of Data Processing	Existence of a contract
Does automated decision-making or profiling take place in connection with the data processing?	No
Rights Involved, Enforcement of Rights	- information, erasure, rectification, restriction, the right to be forgotten, objection, - you may exercise your rights by contacting the data controller, or you may turn to the NAIH

Our company engages a data processor for the maintenance and management of its website, who provides the IT services **(hosting and server services).**

Service Provider	Hetzner Online GmbH
Registered Office	91710 Gunzenhausen Germany Industriestr. 25
Legal basis for data processing	Data processing based on a contract
Purpose of data processing	hosting, server services
Scope of affected parties	Clients with a contractual relationship with the company
Data	Information provided via the website
Method of data processing	Electronically
Duration of Data Processing	Existence of a contract
Does automated decision-making or profiling take place in connection with the data processing?	No
Rights Involved, Enforcement of Rights	- information, erasure, rectification, restriction, the right to be forgotten, objection, - you may exercise your rights by contacting the data controller, or you may turn to the NAIH

2. National Tax and Customs Administration

Company Name	National Tax and Customs Administration, South Budapest Tax and Customs Directorate
Registered Office	1096 Budapest, Haller street 3-5.
Legal Basis for Data Processing	Data processing based on a legal obligation
Purpose of Data Processing	Provision of data; compliance with tax and accounting regulations
Scope of Data Subjects	Employees of the company
Data	Related to the employment relationship (payroll and contribution data, sickness benefit data, start and end dates of employment)
Method of Data Processing	Electronic
Duration of Data Processing	8 years
Whether Automated Decision-Making or Profiling Takes Place in Connection with Data Processing	No
Rights of Data Subjects, Enforcement of Rights	- information, erasure, rectification, restriction (blocking), the "right to be forgotten," objection; - rights may be exercised by contacting the data controller; the data subject may also turn to the NAIH (National Authority for Data Protection and Freedom of Information).

3. Local Government

Company Name	Tolcsva Joint Office Joint municipal office of Tolcsva, Vámosújfalu, and Háromhuta
Registered Office	16 Szabadság square, 3934 Tolcsva
Legal Basis for Data Processing	Data processing based on a legal obligation
Purpose of Data Processing	Compliance with tax legislation, local municipal decrees, and regulations
Scope of Data Subjects	Accommodation details, guests
Data	Data required for the payment of the local tourist tax (IFA)
Method of Data Processing	Electronic
Duration of Data Processing	8 years
Whether Automated Decision-Making or Profiling Takes Place in Connection with Data Processing	No
Rights of Data Subjects, Enforcement of Rights	- information, erasure, rectification, restriction, the right to be forgotten, objection, - you may exercise your rights by contacting the data controller, or you may turn to the NAIH

SCOPE OF PROCESSED DATA

Relevant personal data deemed necessary for the Data Controller's operations, as well as personal data requested, recorded, and processed in order to comply with legal obligations—specifically concerning the data subjects (guests):

- last name, first name,
- residential address,
- e-mail address,
- phone number,
- date of birth (age),
- data related to credit or bank cards, in connection with bookings and payments
- personal data necessary for the establishment, maintenance, or termination of an employment relationship, the scope of which is detailed in the *Workplace Data Processing Notice*

Although not classified as personal data, the Accommodation Provider also records the following information on its forms during the booking process:

- number of guests,
- room type,
- arrival/departure date.

DATA PROCESSING CATEGORIES APPLIED BY THE ACCOMMODATION PROVIDER

1. Booking
2. Guest identification
3. Maintaining the guest register
4. Completion of the registration form
5. Payment of the local tourist tax
6. Data processing related to a contract
7. Data processing based on a legal obligation
8. Other data processing

1. DATA PROCESSING RELATED TO BOOKINGS

Via Booking.com or Szallas.hu

Guests can book accommodation via Booking.com and Szallas.hu, or by sending an email to the operator.

Data required to be provided by the guest during the booking process via Booking.com or Szallas.hu (the data subject, in the capacity of a guest):

- surname, first name,
- residential address,
- citizenship,
- place and date of birth,
- phone number,
- e-mail address,
- bank card details

For bookings made via Booking.com or Szallas.hu, Booking.com's own privacy policy applies to guests (as data subjects).

Booking.com and Szallas.hu make the following data available to the accommodation provider, in their capacity as Booking.com users:

- surname, first name,
- country,
- address,
- phone number

The data mentioned above is stored within the Booking.com system. The accommodation provider processes this data when the guest—the data subject—arrives in person. At this point, the guest register and the registration form are completed.

Via email
The operator will respond to the guest's email via email, informing them whether there is availability for the requested date, as well as the total cost of the booking and the payment terms.

If no actual booking takes place, the operator will delete the guest's email address within 30 days of receiving the email. If a booking is made, the email address will be deleted within 30 days of the guest's departure.

Phone: Reservations cannot be made by phone.
The accommodation does not use a landline telephone.

2. IDENTIFICATION OF THE GUEST

In Hungary, as of September 1, 2021, accommodation providers are required to record the personal data of every guest—as specified by law—at the time of arrival using a document scanner integrated into their property management software, and subsequently transmit this data to the Closed Database for Guest Information (VIZA).

As of September 1, 2021, all accommodation providers are required to transmit guest data via the VIZA system, using a document reader as specified in Section 2, Point 9 of Government Decree 235/2019 (X. 15.).

The accommodation provider is required to record the data specified in Section 9/H, Subsection (1) of the Tourism Act, using a document scanner connected to the accommodation management software.

Data to be recorded:

- surname and first name;
- surname and first name at birth;
- place of birth;
- date of birth;
- gender of the guest;
- citizenship;
- mother's birth surname and given name(s) (if not included in the identification document, this need not be recorded);

- identification data from an identity document or travel document; in the case of a third-country national, the visa or residence permit number, and the date and place of entry (third-country national: persons as defined by Act II of 2007 on the Entry and Stay of Third-Country Nationals);
- the address of the accommodation, the start date of the stay, the expected end date, and the actual end date.

Data not contained in a document suitable for personal identification need not be recorded.

The accommodation provider shall store the aforementioned data of the person utilizing the accommodation service—exclusively in an encrypted format provided by a party designated in a government decree—until the last day of the year following the year in which the data came to the provider's knowledge.

Data that cannot be captured via the document reader is entered manually by the accommodation provider into the accommodation management software (e.g., if the data on the document is damaged, or if the document reader is unable to scan it for some other reason).

Manual entry is possible in exceptional cases; however, even in such instances (where this is caused by a malfunction of the document reader), every effort must be made to resolve the underlying issue preventing the proper use of the document reader as soon as possible.

3. DATA PROCESSING RELATED TO MAINTAINING A GUESTBOOK

Guests must fill out a guestbook at the accommodation.

Legal basis for data processing:	Contract-based
Purpose of data processing:	Performance of the contract; initiation of debt collection procedures in the event of non-payment; initiation of claims for damages in the event of harm caused; initiation of proceedings with the competent authorities in the event of a criminal offense or regulatory violation; and settlement of accounts with the local government.
Scope of data subjects:	Guests of the accommodation
Data (data subject as a guest):	- surname and first name, - citizenship (in the case of a foreign national), - place and date of birth, - residential address, - passport, visa, or residence permit number (in the case of a foreign national), - national identity card number (in the case of a Hungarian citizen),
Method of data processing:	Electronic
Duration of data processing:	5 years
Does automated decision-making or profiling take place in connection with the data processing?	No

Rights concerned, enforcement of rights:	- information, erasure, rectification, restriction, the right to be forgotten, objection, - you may exercise your rights by contacting the data controller, or you may turn to the NAIH

4. DATA PROCESSING IN CONNECTION WITH COMPLETING THE REGISTRATION FORM

Legal basis for data processing:	Performance of the contract
Purpose of data processing:	Payment of accommodation fees, issuance of invoices, settlement with the local government
Scope of data subjects:	Guests of the accommodation
Data (data subject as a guest):	- surname and first name, - residential address, - citizenship, - place and date of birth, - billing address, - vehicle license plate number, - signature
Method of data processing:	Paper-based
Duration of data processing:	5 years
Does automated decision-making or profiling take place in connection with the data processing?	No
Rights concerned, enforcement of rights:	- information, erasure, rectification, restriction, the right to be forgotten, objection, - you may exercise your rights by contacting the data controller, or you may turn to the NAIH

As of September 2021, the accommodation provider no longer uses registration forms. Completed registration forms are kept in a locked cabinet in the accommodation provider's office.

5. DATA PROCESSING RELATED TO THE PAYMENT OF THE TOURIST TAX (IFA)

The accommodation provider is subject to a tourist tax (IFA) payment obligation to the competent local government.

The operator must pay the tax to the joint local authority based on the guest nights spent by guests who have reached the age of 18.

6. DATA PROCESSING RELATED TO THE CONTRACT

data of contracting partners, representatives, and contact persons	for the purpose of the performance of the contract	contractual legal basis	5 years following the termination of the contract

Processing of data of contracting partners

For the purpose of fulfilling the accommodation agreement—specifically regarding the conclusion, execution, and termination of the contract, as well as the fulfillment of orders—the Accommodation Provider processes data concerning its contractual partners and their representatives (or points of contact). This data includes: company name, tax identification number, company registration number, the addresses of the registered office and any business premises, the name of the representative, the representative's (or contact person's) phone number and e-mail address, and the partner's bank account number. Such data processing is considered lawful even if it occurs prior to the conclusion of the contract, provided it is necessary for the purpose of entering into said contract.

Recipients of personal data:	the operator of the accommodation
Duration of the processing of personal data:	5 years following the termination of the contract.
Legal basis:	contractual legal basis

Before the processing of data begins, the data subject must be informed that the processing is based on the performance of a contract; this information may also be provided within the contract itself.

The data subject must be informed about the transfer of their personal data to a data processor.

7. DATA PROCESSING BASED ON A LEGAL OBLIGATION

tax and accounting data management	for the purpose of fulfilling a legal obligation	based on a legal obligation	8 years following the termination of the legal relationship that served as the legal basis

Data processing for the purpose of fulfilling tax and accounting obligations

The Accommodation Provider processes the data—as defined by law—of natural persons with whom it enters into a business relationship (whether as customers or suppliers), for the purpose of fulfilling legal obligations, specifically those related to tax and accounting requirements (bookkeeping, taxation).

The retention period for personal data is 8 years following the termination of the legal relationship that serves as the legal basis.

Recipients of personal data: data processors performing tax, accounting, payroll, and social security-related tasks for the Accommodation, and the National Tax and Customs Administration.

8. OTHER DATA PROCESSING

IT System Monitoring

The maintenance and supervision of the hardware and software used by the accommodation provider are handled by an internal department; consequently, no data is transferred to external service providers.

Accounting services

The Company processes the legally defined data of natural persons with whom it enters into a business relationship—whether as customers or suppliers—for the purpose of fulfilling legal obligations, specifically those related to tax and accounting requirements (bookkeeping, taxation). Personal data are retained for a period of 8 years following the termination of the legal relationship that serves as the legal basis for the processing.
The Company performs its bookkeeping and accounting tasks through an internal department; consequently, accounting data are not transmitted to external service providers, but only to authorities in accordance with legal requirements or upon formal request.

Recipients of personal data: employees of the Company who perform tax and accounting tasks.

OPERATION OF AN ELECTRONIC SURVEILLANCE SYSTEM

The Data Controller informs the Data Subjects that it operates a camera system for the following purposes: ensuring the safety of Data Subjects; protecting the property of the accommodation facility; preventing theft; monitoring workplace discipline; ensuring compliance with occupational health and safety regulations and other legal requirements related to the operation of the accommodation facility; and guaranteeing an undisturbed and safe stay for guests.

Footage from an electronic surveillance system may be used only insofar as the unlawful events—and the proof thereof—cannot be established by other means, and provided that the use of such technical devices is strictly necessary and does not entail a disproportionate restriction of the right to informational self-determination.

Within the accommodation premises—including its buildings, rooms, and grounds—movement is monitored via an electronic surveillance system, which captures video footage containing personal data. The system is operated by FÉMALK Zrt.

As a data controller, the Accommodation Provider ensures the security of the data it processes; in accordance with Section 4 of the Infotv. (Act on the Right of Informational Self-Determination and on Freedom of Information), it processes the data it obtains exclusively for specific purposes—namely, for the exercise of rights and the fulfillment of obligations. Throughout every stage of the data processing, the Accommodation Provider adheres to the fundamental principles of legality, purpose limitation, fairness, necessity, and data minimization.

The accommodation provider informs persons entering the premises about the operation of the camera system with the sign: "Area under camera surveillance."

The accommodation provider may not operate a camera in any location where surveillance would infringe upon human dignity. This applies, in particular, to changing rooms, showers, restrooms, and guest rooms, as well as to any area where an employee spends their work break.

Detailed information regarding the operation of the electronic surveillance system is contained in the document titled *"Policy on the Operation of the Electronic Surveillance System at the Újhuta Castle Hotel."*

DATA PROCESSING BY THE COMPANY ON ITS WEBSITE AND FACEBOOK

Data processing on the website:

The Accommodation maintains the website www.ujhutakastelyszallo.hu
Data processing on the website is covered in the document titled *"Data Processing on the Website."*

Data Processing on the Company's Facebook Page

The Accommodation operates a Facebook page.
The official Facebook page of the Accommodation is:
https://www.facebook.com/ujhutakastelyszallo
This official page serves to share news, information, and details regarding services related to the Accommodation.

The Accommodation does not process personal data posted by visitors on its Facebook page. Visitors are subject to Facebook's Data Policy and Terms of Service.

In the event that unlawful or offensive content is published, the Accommodation may, without prior notice, remove the individual concerned from the community or delete their comment.

The Accommodation Provider is not liable for any content or comments posted by Facebook users that violate the law. The Company is not liable for any errors or malfunctions resulting from the operation of Facebook, nor for any issues arising from changes to the system's operation.

The legal basis for data processing is the consent of the data subject.
Detailed information regarding data processing on Facebook is contained in a document titled *"Data Processing on Facebook."*

RIGHTS OF DATA SUBJECTS

The Regulation and the Info.tv. grant rights to the data subjects affected by the Accommodation Provider's data processing, enabling them to obtain information about the data processing and to exercise control over it.

Right to prior information
The data subject is entitled to receive information regarding the facts and details related to the data processing before the processing begins.

The data subject's right of access
The data subject has the right to obtain confirmation from the controller as to whether or not their personal data are being processed, and, where that is the case, the right to access the personal data and the related information specified in the Regulation.

The right to rectification
The data subject has the right to have inaccurate personal data concerning them rectified by the controller without undue delay upon their request. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed—including by means of providing a supplementary statement.

The right to erasure ("the right to be forgotten")
The data subject has the right to have their personal data erased by the controller without undue delay upon request, and the controller is obliged to erase the personal data concerning the data subject without undue delay if one of the grounds specified in the Regulation applies.

Right to restriction of processing
The data subject has the right to request that the Data Controller restrict the processing of data, provided that the conditions specified in the regulation are met.

Obligation to notify regarding the rectification or erasure of personal data or the restriction of processing
The Data Controller shall inform every recipient to whom the personal data have been disclosed of any rectification, erasure, or restriction of processing, unless this proves impossible or involves disproportionate effort. Upon the request of the data subject, the Data Controller shall inform them about these recipients.

The right to data portability
Subject to the conditions set out in the Regulation, the data subject has the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used, and machine-readable format, and has the right to transmit those data to another controller without hindrance from the controller to whom the personal data were provided.

The right to protest
The right to object applies to the data subject in cases where the legal basis for data processing is the exercise of public authority or the pursuit of legitimate interests.

Automated decision-making in individual cases, including profiling
The data subject has the right not to be subject to a decision based solely on automated processing—including profiling—which produces legal effects concerning them or similarly significantly affects them.

Restrictions
Union or Member State law to which the controller or processor is subject may, through legislative measures, restrict the scope of the provisions set out in Articles 12 to 22 and Article 34, as well as the rights and obligations defined in Articles 12 to 22.

Informing the data subject about the personal data breach
If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall inform the data subject of the personal data breach without undue delay.

Right to lodge a complaint with a supervisory authority (right to an administrative remedy)
The data subject has the right to lodge a complaint with a supervisory authority—in particular in the Member State of their habitual residence, place of work, or place of the alleged infringement—if the data subject considers that the processing of personal data relating to them infringes the Regulation.

Right to an effective judicial remedy against the supervisory authority
Every natural or legal person has the right to an effective judicial remedy against a legally binding decision of the supervisory authority concerning them, or in the event that the supervisory authority fails to handle a complaint or does not inform the data subject within three months of the progress or outcome of the proceedings regarding the complaint lodged.

Right to an effective judicial remedy against a controller or processor
Every data subject has the right to an effective judicial remedy if they consider that their rights under this Regulation have been infringed as a result of the processing of their personal data in a manner that does not comply with this Regulation.

Data Protection Authority: National Authority for Data Protection and Freedom of Information (NAIH), 1125 Budapest, Szilágyi Erzsébet fasor 22/C

SUBMISSION OF THE DATA SUBJECT'S REQUEST, MEASURES TAKEN BY THE DATA CONTROLLER

The Data Controller shall inform the data subject of the measures taken following their request to exercise their rights without undue delay, and in any event within one month of receipt of the request.

Where necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. The Data Controller shall inform the data subject of any such extension within one month of receipt of the request, stating the reasons for the delay.

If the data subject has submitted the request by electronic means, the information shall be provided by electronic means where possible, unless the data subject requests otherwise.

If the Controller does not take action following the data subject's request, it shall inform the data subject—without delay and at the latest within one month of receipt of the request—of the reasons for not taking action, as well as of the fact that the data subject may lodge a complaint with a supervisory authority and exercise their right to a judicial remedy.

The Data Controller shall provide the information referred to in Articles 13 and 14 of the Regulation, as well as information and measures regarding the rights of the data subject, free of charge. If the data subject's request is manifestly unfounded or—particularly due to its repetitive nature—excessive, the Data Controller, taking into account the administrative costs involved in providing the requested information or taking the requested action:
a) You may be charged a fee of HUF 3,000, or
b) may refuse to take action based on the request.
The burden of proving that a request is manifestly unfounded or excessive lies with the Data Controller.

If the Data Controller has reasonable doubts concerning the identity of the natural person submitting the request, it may request the provision of additional information necessary to confirm the identity of the data subject.

DATA SECURITY PROVISIONS

Taking into account the state of the art, the costs of implementation, the nature, scope, context, and purposes of the data processing, as well as the risks of varying likelihood and severity to the rights and freedoms of natural persons, the Accommodation Provider implements appropriate technical and organizational measures to ensure a level of data security commensurate with the level of risk.

In light of the foregoing, the accommodation provider is obliged to guarantee the confidentiality, integrity, and availability of the data it processes.

In order to determine the appropriate level of data security measures, the accommodation provider evaluates every dataset under its control in terms of protection requirements and assigns it to a specific security level.

To determine the security level for individual data processing activities, it is necessary to analyze:

a) the risk and expected damage associated with unauthorized access to, alteration of, or deletion of the personal data being processed, as well as damage to hardware and software resources;
b) whether the damaged dataset can be restored, as well as the costs associated with any such restoration, the availability of data sources required to reproduce the personal data, and the possibility of replacing the lost data from manual backup records;
c) whether, given the nature of the personal data being processed, it is justified to apply differentiated security requirements;
d) other risk factors that jeopardize data security;

To ensure the security of data processing, the accommodation provider employs a combination of physical, logical, and administrative controls. Protection for software and programs is maintained through password protection, encryption, logging, and the management of system access, while paper-based records are secured by keeping them in a locked office.

DATA PROTECTION INCIDENT

Under the Regulation, a personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, personal data transmitted, stored or otherwise processed.

A data protection incident includes the loss or theft of a device containing personal data; the loss or inaccessibility of a decryption key for files encrypted by the data controller; a ransomware infection that renders data processed by the data controller inaccessible until a ransom is paid; an attack on an IT system; an email containing personal data sent to the wrong recipient; or the public disclosure of a mailing list, among other examples.

Upon detection of a personal data breach, the representative of the Accommodation Provider shall immediately conduct an investigation to identify the breach and determine its potential consequences. Necessary measures must be taken to mitigate any damage.

A personal data breach must be notified to the competent supervisory authority without undue delay and, where feasible, no later than 72 hours after having become aware of it, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. If the notification is not made within 72 hours, it must be accompanied by reasons justifying the delay.

The data processor shall notify the controller of a personal data breach without undue delay after becoming aware of it:

- the nature of the personal data breach must be described, including – where possible – the categories and approximate number of data subjects concerned, as well as the categories and approximate number of data records concerned;
- the name and contact details of the data protection officer or other contact person providing further information must be communicated;
- the likely consequences resulting from the personal data breach must be described;
- the measures taken or proposed by the data controller to address the personal data breach must be described, including, where appropriate, measures aimed at mitigating any potential adverse consequences resulting from the personal data breach.

The controller maintains a record of personal data breaches, documenting the facts relating to the breach, its effects, and the remedial actions taken. This record enables the supervisory authority to verify compliance with the requirements set out in Article 33 of the Regulation.

FINAL PART

The Company undertakes that all data processing activities related to its operations shall comply with the requirements set forth in this Policy and in applicable legislation.

The Company reserves the right to amend the Data Processing Policy.