

TAHITI-RESORT SZOLGÁLTATÓ KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG

DATA PROTECTION STATEMENT

1. GENERAL PROVISIONS

The TAHITI-RESORT Szolgáltató Korlátolt Felelősségű Társaság, HU- 2146 Mogyoród, Móra Ferenc utca 12., the operator of Tahiti Resort Apartments Hajdúszoboszló shall ensure that data processing is lawful and expedient in all cases where it processes personal data. The purpose of this data protection statement is to ensure that guests who make a reservation and give access to their personal data receive appropriate information already at the point of reservation or prior to giving access to their personal data with regards to the duration and under which conditions and guarantees our firm processes their data. Our company shall regard the contents of this data protection statement as mandatory and shall abide by its contents in each instance where it handles personal data.

We reserve the right, however, to change the terms of this unilateral declaration, in which case we will inform the persons concerned in advance. Should you have any questions with regards to the contents of this brochure please write us via email. Data processing related to our firm's activities is based on voluntary contribution, or in some cases the data processing is necessary in order to take steps at the request of the data subject prior to entering into a contract;

Our data processing activities comply with applicable laws, in particular with the following:

- The Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter referred to as “**GDPR**”)
- The Act CXII of 2011 on Informational Self-determination and Freedom of Information (Hungarian abbreviation: “**Info.tv**”).

The firm's data and contact data are as follows:

Name: TAHITI-RESORT Szolgáltató Korlátolt Felelősségű Társaság

PPB: HU- 2146 Mogyoród, Móra Ferenc utca 12.

Company registry number: 13-09-203750

TIN: 27309656-2-13

Phone: +36 501204585

E-mail: sales@tahitiresort.hu and info@tahitiresort.hu

We provide the following information regarding individual instances of data processing:

2. DATA PROCESSING IN RELATION TO ONLINE HOTEL BOOKING

Our company provides an opportunity for online lodging reservation in order that our customers may book a room free of charge in a quick, convenient way in Tahiti Resort Apartments Hajdúszoboszló.

Personal data controller: TAHITI-RESORT Szolgáltató Korlátolt Felelősségű Társaság, HU- 2146 Mogyoród, Móra Ferenc utca 12.

The purpose of data processing: to render the reservation of lodgings easier, more efficient and free of charge, contacting the guest with hotel reservation.

Legal basis of data processing: the prior consent of the person who reserves lodging. By accepting this data protection statement, the data subject expressly consents to the processing of his/her personal data according to this section.

The scope of processed personal data: title; surname and given name; address (country, postcode, city, street, street number; phone number; e-mail address; in case of a company name of company and PBB; bank card number; SZÉP card number (identifier, name displayed on card). If filling in an online check-in form, the following information will also be managed by the accommodation: identity document number (identity card, passport or driving license), nationality, place and date of birth, vehicle registration number.

Duration of data processing: two years after the last day of stay as stated in the reservation.

Engagement of data processor: our company uses the services of an information service provider for the online lodging system as follows:

Name of data processor	PPB	Description of data processing task
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A Hungary	Providing an opportunity for online lodging reservation and operating a pre-arrival email module through RESnWEB system.

By accepting this data protection statement, the data subject gives his express consent that the data processor shall engage further data processors in order to render its services more convenient and customized as follows:

Name of additional data processor	PPB	Description of data processing task
Hostware Kft.	1149 Budapest, Róna utca 120-122 Hungary	In the event that Hostware Front Office hotel system is used, performance of tasks related to customer management.
BIG FISH Payment Services Kft.	1066 Budapest, Nyugati tér 1-2 Hungary	Providing data communications for payment transactions between the vendor's and the payment provider's systems, ensuring traceability for the transaction partners.
OTP Mobil Kft.	1093 Budapest, Közraktár u. 30-32.	Providing data communications for payment transactions between the vendor's and the payment provider's systems, providing customer service for users, confirming transactions and providing fraud-monitoring to protect the interests of the users.
Barion Payment Zrt.	1117 Budapest, Infopark sétány 1. I. épület Hungary	Providing data communications for payment transactions between the vendor's and the payment provider's systems, providing customer service for users, confirming transactions and providing fraud-monitoring to protect the interests of the users.
Creative Management Kft.	8200 Veszprém, Boksa tér 1. A. ép. Hungary	Performance of tasks related to server hosting.

Name of additional data processor	PPB	Description of data processing task
Wildbit, LLC*	225 Chestnut St, Philadelphia, PA 19106, USA	The owner of the software which is integrated into the booking system. This software is responsible for sending e-mail confirmations and notifications in the event of booking, requesting and providing proposals, customer satisfaction surveys, pre-arrival information and gift voucher selling.
thePass Kft.	1061 Budapest, Király utca 30-32. A. ép. 105.	SabeeApp to perform tasks related to customer management and to manage the rates and availabilities on multiple distribution websites.
Produkcións Részleg Kft.	1141. Budapest, Bazaarózsza utca 88.	Intermediation of server and web hosting service
Premiza Kft.	1054. Budapest, Honvéd utca 8.	Bookkeeping
23VNet Kft.	1132 Budapest, Victor Hugo u. 18-22.	Web hosting service

* The registered seat of the data processor is in the United States of America, and as such, transfer towards the processor is data transfer to a third country. For this reason, data processor expressly informs data controller that Wildbit, LLC has included the standard data protection clauses recommended and adopted by the European Commission in the Data Protection Supplement of its General Terms and Conditions. Therefore, even without the authorisation from a supervisory authority, transfer of data to Wildbit, LLC constitutes a transfer of data provided with appropriate safeguards, and has no legal impediments.

Possible negative consequences of not providing personal data: Providing data is voluntary. It is important to note that filling in the fields marked with * is mandatory, and in case of non-completion, no reservation can be made. Leaving the remaining fields blank does not have such a consequence.

The rights of the data subject: the data subject (the person whose data our company processes)

- a. shall have the right to request access to the personal data related to him/her,
- b. shall have the right to request their rectification,
- c. shall have the right to request their erasure,
- d. shall have the right to revoke their consent for data processing at any time with effect for the future. Such revocation has no effect for the past, i.e. it does not affect the legitimacy of the data processing carried out up to the revocation.
- e. in the event that the conditions listed in Article 18 of the GDPR are met, shall have the right to request that the processing of his/her personal data be restricted (that is, that our firm does not erase or destroy the data until a court or other authority is applied to for a maximum of thirty days, and in addition that our company does not the process the data with another purpose),
- f. has the right to contest the processing of personal data,
- g. has the right to exercise his/her right to data portability. In accordance with this latter right the data subject has the right to receive the personal data related to him/her in

Word or Excel format, further has the right to request that our company forward these data to another data controller.

Other information related to data processing:

- By booking, the data subject also states that the information provided is true and he/she has reached the age of 16.
- We try to help our guests prepare their journey and shorten the time they spend on arrival with practical and relevant information, weather forecasts, programme offers, option of online check-in, so we send them pre-arrival email information about accommodation, travel and programme info. Based on the pre-arrival letter, the guests can fill in an online check-in form to speed up their check-in on arrival.
- Our company takes every technological and organisational measure to avoid an eventual personal data breach (for instance, if the files containing personal data are damaged, disappear, or become accessible to unauthorised persons). Should a personal data breach nevertheless take place, we shall keep records in order to supervise the necessary measures as well as to inform the affected data subjects. This record shall contain the scope of affected personal data, the circle and number of data subjects affected by the privacy incident, the date, circumstances, effects of the personal data breach as well as the measures taken to deal with it, as well as other data as defined by the laws regulating data processing.
- Our company concluded a data processing agreement for the scope of data processing tasks, in which the NetHotelBooking Kft. undertakes that in the event of the engagement of another data processor it shall apply on a mandatory basis the same data protection and data processing guarantees included in data processing contract with us, thus we ensure the lawful management of personal data in case of data processors as well.

3. DATA PROCESSING IN RELATION TO REQUESTING QUOTES

Our company provides an opportunity for our guests to request a proposal in an electronic way. The proposal is provided by our company while taking account of actual room availability through an automated system.

Personal data controller: TAHITI-RESORT Szolgáltató Korlátolt Felelősségű Társaság, HU-2146 Mogyoród, Móra Ferenc utca 12.

Purpose of data processing: to receive information prior to booking about hotel prices.

Legal basis of data processing: the prior consent of person who reserves lodging, Article 6 Section 1 Point a) of the GDPR, or necessary in order to take the steps requested by the data subject prior to the conclusion of a data processing contract - Article 6 Section 1 Point b) of the GDPR.

Scope of processed personal data: title; surname and given name; phone number; e-mail address; number of guests.

Duration of data processing: two years after the last day of stay as stated in the reservation.

Engagement of data processor: our company uses the services of an information service provider for the online proposal system in accordance with the following:

Name of data processor	PPB	Description of data processing task
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A Hungary	Operating the proposal requesting and sending module

By accepting this data protection statement, the data subject gives his express consent that the data processor shall engage further data processors in order to render its services more convenient and customized as follows:

Name of additional data processor	PPB	Description of data processing task
Creative Management Kft.	8200 Veszprém, Boksa tér 1. A. ép. Hungary	Performance of tasks related to server hosting.
Wildbit, LLC*	225 Chestnut St, Philadelphia, PA 19106, USA	The owner of the software which is integrated into the booking system. This software is responsible for sending e-mail confirmations and notifications in the event of booking, requesting and providing proposals, customer satisfaction surveys, pre-arrival information and gift voucher selling.

* The registered seat of the data processor is in the United States of America, and as such, transfer towards the processor is data transfer to a third country. For this reason, data processor expressly informs data controller that Wildbit, LLC has included the standard data protection clauses recommended and adopted by the European Commission in the Data Protection Supplement of its General Terms and Conditions. Therefore, even without the authorisation from a supervisory authority, transfer of data to Wildbit, LLC constitutes a transfer of data provided with appropriate safeguards, and has no legal impediments.

Possible negative consequences of not providing personal data: Providing data is voluntary. It is important to note that filling in the fields marked with * is mandatory, and in case of non-completion, no request for proposal can be made and the hotel cannot provide a proposal. Leaving the remaining fields blank does not have such a consequence.

The rights of the data subject: the data subject (the person whose data our company processes)

- a. shall have the right to request access to the personal data related to him/her,
- b. shall have the right to request their rectification,
- c. shall have the right to request their erasure,
- d. shall have the right to revoke their consent for data processing at any time with effect for the future. Such revocation has no effect for the past, i.e. it does not affect the legitimacy of the data processing carried out up to the revocation.
- e. in the event that the conditions listed in Article 18 of the GDPR are met, shall have the right to request that the processing of his/her personal data be restricted (that is, that our firm does not erase or destroy the data until a court or other authority is applied to for a maximum of thirty days, and in addition that our company does not the process the data with another purpose),
- f. has the right to contest the processing of personal data,
- g. has the right to exercise his/her right to data portability. In accordance with this latter right the data subject has the right to receive the personal data related to him/her in Word or Excel format, further has the right to request that our company forward these data to another data controller.

Other information related to data processing: our company takes every technological and organisational measure to avoid an eventual personal data breach (for instance, if the files containing personal data are damaged, disappear, or become accessible to unauthorised persons). Should a personal data breach nevertheless take place, we shall keep records in order to supervise the necessary measures as well as to inform the affected data subjects. This record shall contain the scope of affected personal data, the circle and number of data subjects affected by the privacy incident, the date, circumstances, effects of the personal data breach as well as the measures taken to deal with it, as well as other data as defined by the laws regulating data processing.

Our company concluded a data processing agreement for the scope of data processing tasks, in which the NetHotelBooking Kft. undertakes that in the event of the engagement of another data processor it shall apply on a mandatory basis the same data protection and data processing guarantees included in data processing contract with us, thus we ensure the lawful management of personal data in case of data processors.

4. DATA PROCESSING RELATED TO NEWSLETTERS SUBSCRIPTION

Our company maintains contact with its guests via a newsletter, in which it informs its guests about its services, news relating to its operation as well as available discounts.

Personal data controller: TAHITI-RESORT Szolgáltató Korlátolt Felelősségű Társaság, HU-2146 Mogyoród, Móra Ferenc utca 12.

Purpose of data processing: maintaining contact with potential guests.

Legal basis of data processing: consent of the data subject – Article 6 Section 1 Point a) of GDPR.

Description of legitimate interest: maintenance and development of business relationships with partners and guests

Scope of processed personal data: name, e-mail address

Duration of data processing: our company processes e-mail addresses until such date that unsubscription occurs.

Engagement of data processor: our company uses the services of an information service provider for the online lodging system as follows:

Name of data processor	PPB	Description of data processing task
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A Hungary	Storage of e-mail marketing database.

By accepting this data protection statement, the data subject gives his express consent that the data processor shall engage further data processors in order to render its services more convenient and customized as follows:

Name of additional data processor	PPB	Description of data processing task
Creative Management Kft.	8200 Veszprém, Boksa tér 1/A Hungary	Operation of newsletter sending system.
MailerLite	11341 Lithuania, Vilnius, Paupio g. 46	Operation of newsletter sending system.

Possible negative consequences of not providing personal data: The data subject will not be able to receive the company's newsletter.

The rights of the data subject: the data subject (the person whose data our company processes)

- a. shall have the right to request access to the personal data related to him/her,
- b. shall have the right to request their rectification,
- c. shall have the right to request their erasure,
- d. shall have the right to revoke their consent for data processing at any time with effect for the future. Such revocation has no effect for the past, i.e. it does not affect the legitimacy of the data processing carried out up to the revocation.
- e. in the event that the conditions listed in Article 18 of the GDPR are met, shall have the right to request that the processing of his/her personal data be restricted (that is, that our firm does not erase or destroy the data until a court or other authority is applied to for a maximum of thirty days, and in addition that our company does not process the data with another purpose),
- f. has the right to contest the processing of personal data,
- g. has the right to exercise his/her right to data portability. In accordance with this latter right the data subject has the right to receive the personal data related to him/her in Word or Excel format, further has the right to request that our company forward these data to another data controller.

You are able to unsubscribe from our company's newsletter by sending an e-mail to this e-mail address sales@tahitiresort.hu, or by clicking the icon "Unsubscribe" found in this newsletter. In this case we will immediately delete your e-mail address from our database.

Other information related to data processing: our company takes every technological and organisational measure to avoid an eventual personal data breach (for instance, if the files containing personal data are damaged, disappear, or become accessible to unauthorised persons). Should a personal data breach nevertheless take place, we shall keep records in order to supervise the necessary measures as well as to inform the affected data subjects. This record shall contain the scope of affected personal data, the circle and number of data subjects affected by the privacy incident, the date, circumstances, effects of the personal data breach as well as the measures taken to deal with it, as well as other data as defined by the laws regulating data processing.

Our company concluded a data processing agreement for the scope of data processing tasks, in which the NetHotelBooking Kft. undertakes that in the event of the engagement of another data processor it shall apply on a mandatory basis the same data protection and data processing guarantees included in data processing contract with us, thus we ensure the lawful management of personal data in case of data processors.

5. PROCESSING OF PERSONAL DATA RELATED TO CUSTOMER SATISFACTION SURVEYS

As a hotel it is our goal to provide high-quality services to our guests, therefore we continually request feedback from our guests about their experiences while staying at our hotel.

Personal data controller: TAHITI-RESORT Szolgáltató Korlátolt Felelősségű Társaság, HU-2146 Mogyoród, Móra Ferenc utca 12.

Purpose of data processing: requesting feedback from our guests in order to further develop and improve our services.

Legal basis of data processing: the legitimate interest of the hotel operator – Article 6 Section 1 Point f) of GDPR.

Description of legitimate interest: our company has a legitimate interest to receive information related to improvement of its services on the basis of guest feedback.

Scope of processed personal data: name, gender, e-mail address

Duration of data processing: two years after the last day of stay as stated in the reservation.

Engagement of data processor: our company uses the services of an information service provider for the online lodging system as follows:

Name of data processor	PPB	Description of data processing task
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A Hungary	Operating the customer satisfaction module

By accepting this data protection statement, the data subject gives his express consent that the data processor shall engage further data processors in order to render its services more convenient and customized as follows:

Name of additional data processor	PPB	Description of data processing task
Creative Management Kft.	8200 Veszprém, Boksa tér 1. A. ép. Hungary	Performance of tasks related to server hosting.
Wildbit, LLC*	225 Chestnut St, Philadelphia, PA 19106, USA	The owner of the software which is integrated into the booking system. This software is responsible for sending e-mail confirmations and notifications in the event of booking, requesting and providing proposals, customer satisfaction surveys, pre-arrival information and gift voucher selling.

* The registered seat of the data processor is in the United States of America, and as such, transfer towards the processor is data transfer to a third country. For this reason, data processor expressly informs data controller that Wildbit, LLC has included the standard data protection clauses recommended and adopted by the European Commission in the Data Protection Supplement of its General Terms and Conditions. Therefore, even without the authorisation from a supervisory authority, transfer of data to Wildbit, LLC constitutes a transfer of data provided with appropriate safeguards, and has no legal impediments.

Possible negative consequences of not providing personal data: The affected data subject will not receive our company's customer satisfaction survey.

The rights of the data subject: the data subject (the person whose data our company processes)

- a. shall have the right to request access to the personal data related to him/her,
- b. shall have the right to request their rectification,
- c. shall have the right to request their erasure,
- d. shall have the right to revoke their consent for data processing at any time with effect for the future. Such revocation has no effect for the past, i.e. it does not affect the legitimacy of the data processing carried out up to the revocation.

- e. in the event that the conditions listed in Article 18 of the GDPR are met, shall have the right to request that the processing of his/her personal data be restricted (that is, that our firm does not erase or destroy the data until a court or other authority is applied to for a maximum of thirty days, and in addition that our company does not the process the data with another purpose),
- f. has the right to contest the processing of personal data,
- g. has the right to exercise his/her right to data portability. In accordance with this latter right the data subject has the right to receive the personal data related to him/her in Word or Excel format, further has the right to request that our company forward these data to another data controller.

Other information related to data processing: our company takes every technological and organisational measure to avoid an eventual personal data breach (for instance, if the files containing personal data are damaged, disappear, or become accessible to unauthorised persons). Should a personal data breach nevertheless take place, we shall keep records in order to supervise the necessary measures as well as to inform the affected data subjects. This record shall contain the scope of affected personal data, the circle and number of data subjects affected by the privacy incident, the date, circumstances, effects of the personal data breach as well as the measures taken to deal with it, as well as other data as defined by the laws regulating data processing.

Our company concluded a data processing agreement for the scope of data processing tasks, in which the NetHotelBooking Kft. undertakes that in the event of the engagement of another data processor it shall apply on a mandatory basis the same data protection and data processing guarantees included in data processing contract with us, thus we ensure the lawful management of personal data in case of data processors.

6. PROCESSING OF PERSONAL DATA RELATED TO GIFT VOUCHER PURCHASE

Our company provides the opportunity to purchase gift vouchers electronically. The gift voucher is provided by our company via an automated system on our website.

Personal data controller: TAHITI-RESORT Szolgáltató Korlátolt Felelősségű Társaság, HU-2146 Mogyoród, Móra Ferenc utca 12.

Purpose of data processing: gift voucher purchase and delivery

Legal basis of data processing: the prior consent of the person who purchases the gift voucher: by accepting this data protection statement, the data subject consents to the data processing under this clause.

Scope of personal data handled: title; surname and first name; address (country, zip code, city, street, house number); telephone number; email address (both purchaser and beneficiary), ; in case of a company name of company and PBB; bank card number; SZÉP card number (identifier, name displayed on card).

Duration of data processing: two years after the expiration date of the gift voucher.

Engagement of data processor: our company uses the services of an information service provider for the online gift voucher system as follows:

Name of data processor	PPB	Description of data processing task
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A Hungary	Operating the gift voucher selling module

By accepting this data protection statement, the data subject gives his express consent that the data processor shall engage further data processors in order to render its services more convenient and customized as follows:

Name of additional data processors	PPB	Description of data processing task
Creative Management Kft.	8200 Veszprém, Boksa tér 1. A. ép. Hungary	Performance of tasks related to server hosting.
BIG FISH Payment Services Kft.	1066 Budapest, Nyugati tér 1-2 Hungary	Providing data communications for payment transactions between the vendor's and the payment provider's systems, ensuring traceability for the transaction partners.
OTP Mobil Kft.	1093 Budapest, Központ u. 30-32. Hungary	Providing data communications for payment transactions between the vendor's and the payment provider's systems, providing customer service for users, confirming transactions and providing fraud-monitoring to protect the interests of the users.
Barion Payment Zrt.	1117 Budapest, Infopark sétány 1. I. épület Hungary	Providing data communications for payment transactions between the vendor's and the payment provider's systems, providing customer service for users, confirming transactions and providing fraud-monitoring to protect the interests of the users.
Wildbit, LLC*	225 Chestnut St, Philadelphia, PA 19106, USA	The owner of the software which is integrated into the booking system. This software is responsible for sending e-mail confirmations and notifications in the event of booking, requesting and providing proposals, customer satisfaction surveys, pre-arrival information and gift voucher selling.

* The registered seat of the data processor is in the United States of America, and as such, transfer towards the processor is data transfer to a third country. For this reason, data processor expressly informs data controller that Wildbit, LLC has included the standard data protection clauses recommended and adopted by the European Commission in the Data Protection Supplement of its General Terms and Conditions. Therefore, even without the authorisation from a supervisory authority, transfer of data to Wildbit, LLC constitutes a transfer of data provided with appropriate safeguards, and has no legal impediments.

Possible negative consequences of not providing personal data: Providing data is voluntary. It is important to note that filling in the fields marked with * is mandatory, and in case of non-completion, the affected data subject will not be able to purchase gift vouchers. Leaving the remaining fields blank does not have such a consequence.

The rights of the data subject: the data subject (the person whose data our company processes)

- a. shall have the right to request access to the personal data related to him/her,
- b. shall have the right to request their rectification,
- c. shall have the right to request their erasure,
- d. shall have the right to revoke their consent for data processing at any time with effect for the future. Such revocation has no effect for the past, i.e. it does not affect the legitimacy of the data processing carried out up to the revocation.
- e. in the event that the conditions listed in Article 18 of the GDPR are met, shall have the right to request that the processing of his/her personal data be restricted (that is, that our firm does not erase or destroy the data until a court or other authority is applied to for a maximum of thirty days, and in addition that our company does not process the data with another purpose),
- f. has the right to contest the processing of personal data,
- g. has the right to exercise his/her right to data portability. In accordance with this latter right the data subject has the right to receive the personal data related to him/her in Word or Excel format, further has the right to request that our company forward these data to another data controller.

Other information related to data processing: our company takes every technological and organisational measure to avoid an eventual personal data breach (for instance, if the files containing personal data are damaged, disappear, or become accessible to unauthorised persons). Should a personal data breach nevertheless take place, we shall keep records in order to supervise the necessary measures as well as to inform the affected data subjects. This record shall contain the scope of affected personal data, the circle and number of data subjects affected by the privacy incident, the date, circumstances, effects of the personal data breach as well as the measures taken to deal with it, as well as other data as defined by the laws regulating data processing.

Our company concluded a data processing agreement for the scope of data processing tasks, in which the NetHotelBooking Kft. undertakes that in the event of the engagement of another data processor it shall apply on a mandatory basis the same data protection and data processing guarantees included in data processing contract with us, thus we ensure the lawful management of personal data in case of data processors.

7. COOKIE PROCESSING

In the interest of providing customized service, the data controller places a small data packet or cookie on the customer's computer and, in case of a subsequent visit, reads it back. If the browser sends back a previously saved cookie, the provider managing the cookie has the opportunity to connect the user's previous visits with the current one, however, exclusively in relation to its own content.

The purpose of data processing: identification of users, tracing users, distinguishing users from one another, to identify the workflow of users, to store data provided in the course of workflow, to avoid data loss, web analytics, provision of customized service.

Legal basis of data processing: consent of the data subject.

The scope of processed data: identification number, date, time, and the previously visited webpage.

The duration of data processing: maximum 90 days

Name of data processor	PPB	Description of data processing task
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A Hungary	Identifying users and their workflow and sessions, storing data provided in the course of workflow and sessions, avoiding data loss, web analytics, provision of customized service

Other information related to data processing: Users are able to delete cookies from their own computers and may disable the use of cookies in their browsers. Users can usually manage cookies in the browser's Tools/Settings menu under Data Protection/History/Individual Settings menu, under either Cookies or Track options.

Possible negative consequences of not providing personal data: it may become impossible to take advantage of the services provided with regards to services described in points 2-5 above.

8. SERVER LOG FILES

When visiting the webpage nethotelbooking.net, the server automatically stores information on the user's activities in log files.

The purpose of data processing: when a webpage is visited, the service provider supervises the operation of its services, and in order to prevent abuse it records the visitors' data.

Legal basis of data processing: Article 6 Section 1 Point f) of GDPR. Our company has a legitimate interest in the webpage's safe operation.

Type of processed personal data: identification number, date, time, the address of the visited page.

Duration of data processing: maximum 90 days.

Name of data processor	PPB	Description of data processing task
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A Hungary	Recording of visitors' data and information necessary for server operation

Further information: our company does not connect the data that emerges in the course of the protocol analysis with other data, it makes no effort to identify the user. The address of the visited pages, as well as the data relating to date and time are insufficient to identify the affected data subject, however, they may be sufficient in conjunction with other data (for instance, data provided in the course of registration) to reach conclusions about to the user.

Data processing of external service providers in relation to protocols:

The portal's html code contains links independent from our company that are received from external servers and refer to external servers. The server of the external service provider is connected directly to the user's computer. We would like to call our visitors' attention to the fact that the service providers of these links are able to collect user data (for instance, IP address, browser, operating system data, movement of the mouse pointer, address of the website visited and date of visit) during direct connection to their servers on account of the direct communication with the user's browser. An IP address is a series of numbers with which the computers and mobile devices of users can be identified unambiguously.

Through IP addresses it is even possible to identify the geographical location of the visitor using a given computer. The address of the visited pages, as well as the data relating to date and time are insufficient to identify the affected data subject, however, they may be sufficient in conjunction with other data (for instance, data provided in the course of registration) to reach conclusions about the user.

9. OTHER DATA PROCESSING

9.1. BANK CARD INFORMATION

Processed data	Purpose of data processing
Name on the card	Identification, completing the booking
Card number	Drawing on the booking amount, identification
Card expiration	Identification, verification

Scope of data subjects: All data subjects using the service and paying by card.

Purpose of data processing: Completing the booking, drawing on the total amount of the booking, or if there was a cancellation, a partial amount of the booking.

Duration of data processing, deadline of data erasure: Bank card details are encrypted, they may only be revealed for the purpose of the transactions and for the person authorized. After the guests leave the hotel, their data may not ever be revealed or accessed. The data controller erases these data in 8 years.

Potential data controllers entitled to know the data, personal data recipients: Personal data may be processed by an employee designated for this purpose by the data controller.

Description of the data subjects' rights related to data processing:

The data subject has the right to request from the controller access to or rectification or erasure of personal data related to him/her or restriction of processing, and

to object to their processing as well as the right to data portability or to revoke consent at any time.

Access to, rectification or erasure of personal data, restriction of their processing, data portability and objection to data processing may be initiated as per the following:

- by sending a letter addressed to 2146 Mogyoród, Móra Ferenc utca 12. via the postal service
- by sending an email to info@tahitiresort.hu
- by calling +36-50-120-4585.

Legal basis of data processing: contract performance, Article 6 Section 1 Point b) of GDPR. Section 5 (1) of Info tv., Section 169 (2) of Act C of 2000 on Accounting, Section 13/A (3) of Act CVIII of 2001 on Electronic Commerce and on Information Society (hereinafter referred to as Elker tv.):

The service providers shall be authorized to process personal data in connection with providing the service, to the extent absolutely necessary for technical reasons. Where all relevant conditions remain unaltered, service providers shall install equipment for the provision of information society services - and operate under all circumstances - with facilities to ensure that the processing of personal data takes place only when it is absolutely necessary for providing the services and to meet the objectives set out in this Act; however, under no circumstances may they exceed the extent required in terms of time and volume.

Please be informed that the basis for data processing is the performance of the contract. You are obligated to provide the personal data, receiving the service is conditional upon this.

If the data required for data processing is not provided, the data subject may not use the services.

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

9.2 CAMERA SURVEILLANCE

For the purpose of ensuring the safety of our guests and their belongings, there are cameras operating in the area of the accommodation. Camera surveillance is indicated by a pictogram depicting this activity and a warning message.

The purpose of camera surveillance is protection of property and the belongings of the guests, considering the fact that detection of infringements, catching the offender and prevention of infringing acts is not possible in any other way, or evidence thereof may not be collected in any other way.

Please see the individual data processing statement attached to this data processing statement for detailed information on the area of operation of the camera system, the location of specific cameras, the subject of surveillance, the purpose of operation, the technological background of surveillance and the storage time of recordings.

9.3 COMPLAINT MANAGEMENT

Processed data	Purpose of data processing
Surname and given name	Identification, communication.
Home address	Sending replies
E-mail address	Maintaining contact, sending replies
Telephone	Maintaining contact.
Invoice name and address	Identification, management of quality complaints, questions and problems related to the services.
Location, time and mode of complaint lodging	Identification, management of quality complaints, questions and problems related to the services.
Detailed description of complaint, evidence list	Identification, management of quality complaints, questions and problems related to the services, investigation of complaints
In the case of on-the-spot investigation, the data controller's	Complaint management, complaint investigation

statement about his/her opinion about the complaint	
Signature of the person preparing the records and of the person lodging the complaint	Identification, maintaining contact, problem management
Location where the records were prepared	Identification
For complaints lodged by phone or electronically, unique identifier	Identification

Scope of data subjects: All data subjects having and lodging complaints regarding quality.

Duration of data processing, deadline of data erasure: Pursuant to Section 17/A (7) of Act CLV of 1997 on consumer protection, a copy of the records, transcript and reply of the complaint shall be stored for 5 years.

Potential data controllers entitled to know the data, personal data recipients:

Personal data may be processed by the managers of the data controller while respecting the principles referred to above.

Description of the data subjects' rights related to data processing:

The data subject has the right to request from the controller access to or rectification or erasure of personal data related to him/her or restriction of their processing; the data subject has the right to data portability and to revoke consent at any time.

Access to, rectification or erasure of personal data, restriction of their processing and data portability may be initiated as per the following:

- by sending a letter addressed to 2146 Mogyoród, Móra Ferenc utca 12. via the postal service,
- by sending an email to info@tahitiresort.hu,
- by calling +36-50-120-4585.

Legal basis of data processing: consent of the data subject – Article 6 Section 1 Point c) of GDPR and Section 17/A (7) of Act CLV of 1997 on consumer protection.

Please be informed that the provision of personal data is necessary for compliance with a legal obligation.

The conclusion of the contract is conditional upon the personal data being processed. You are obligated to provide the personal data for the purpose of complaint management.

Not providing the data has the negative consequence of us not being able to manage or answer your lodged complaint.

9.4. INTERNAL DATA PROTECTION (DATA SHEET)

Legal basis of data processing: Article 6 Section 1 Point c) of GDPR.

Purpose of data processing: compliance with legal obligations regarding tourism tax.

Duration of data processing, deadline of data erasure: until the competent authority is entitled to check compliance with the obligations as determined in the applicable legislation,

and in the case of the contract, pursuant to Section 169 (2) of Act C of 2000 on accounting, they shall be retained until 31 December of the seventh year following the given year.

Scope of processed data: name, e-mail, phone number, address, identification number, nationality, place and date of birth, license plate number, name and date of birth of persons staying in the same room, other personal data.

Potential data controllers entitled to know the data: Personal data may be processed by the colleagues of the data controller while respecting the principles referred to above.

Description of the data subjects' rights related to data processing:

The data subject has the right to request from the controller access to or rectification or erasure of personal data related to him/her or restriction of processing, and

the data subject has the right to data portability as well as the right to revoke consent at any time.

Access to, rectification or erasure of personal data, restriction of their processing and data portability may be initiated as per the following:

- by sending a letter addressed to 2146 Mogyoród, Móra Ferenc utca 12. via the postal service,
- by sending an email to info@tahitiresort.hu,
- by calling +36-50-120-4585.

9.5. SOCIAL MEDIA SITES

Description of data collection, scope of processed data: Name and public profile picture as registered at social media sites Facebook/Google+/Twitter/Pinterest/Youtube/ Instagram etc.

Scope of data subjects: All data subjects that registered at social media sites Facebook/Google+/Twitter/ Pinterest/Youtube/Instagram etc. and liked the webpage.

Purpose of data collection: Sharing, liking or promoting webpage contents, products, discounts or the webpage itself at social media sites and communication.

Duration of data processing, deadline of data erasure, potential data controllers entitled to know the data and description of the data subjects' rights related to data processing: The data subject may get information about the source and processing of data, as well as the means and legal basis of the data transfer on the given social media site. The data processing is conducted by the social media site, thus the regulations of the given social media site govern the duration and means of data processing, as well as the ways of erasing and modifying the data.

Legal basis of data processing: voluntary consent of the data subject to the processing of his/her personal data at social media sites. The consent may be revoked at any time by unsubscribing from the site. The withdrawal of consent shall not affect the lawfulness of previous processing.

9.6. CUSTOMER RELATIONSHIP MANAGEMENT AND OTHER PROCESSING ACTIVITIES

If the data subject should have any questions or problems during the use of the data controller's service, he/she may find the contact details of the data controller on the webpage (telephone, e-mail, social media sites etc.).

The erasure of e-mails and messages received by the data controller via phone or Facebook etc. and of the data collected this way shall only occur after withdrawal of prior consent to data processing, and the service only ceases when unsubscription from the newsletter occurs.

We provide information in relation to data processing activities not included in this data protection statement when we request such data.

In the case of exceptional requests from authorities or from other bodies as provided by legislation, the provider is obligated to provide information, disclose data or submit documents.

If such body designated the precise purpose and scope of data to be turned over, the service provider provides personal data only to the extent and to the degree which is indispensable for the purpose of the request.

9.7. PRIZE DRAWS

Processed data	Purpose of data processing
Surname and given name	Communication for the purpose of delivering the prize. Identifying the winner.
Home address	Delivering the prize
Telephone	Identification, maintaining contact, consultation
E-mail address	Maintaining contact, identification

Scope of data subjects: All data subjects participating in the prize draw.

Purpose of data processing: Organisation of the prize draw, communication for the purpose of the data controller delivering the prize to the winner.

Duration of data processing, deadline of data erasure: Data is processed until the prize draw ends, and 30 days after the draw the data processed in connection with it are erased (except for a winner drawn again or a backup winner). Pursuant to the tax and accounting legislation in force at all times, the data controller stores the data of the winners or backup winners for 8 years, and erases them when the deadline expires.

Potential data controllers entitled to know the data, personal data recipients: Personal data may be processed by the managers, sales and marketing colleagues of the data controller, the managers of the company controlling the company group, the competent colleagues of companies with activities related to the service and contractual data processors while respecting the principles referred to above.

Description of the data subjects' rights related to data processing:

The data subject has the right to request from the controller access to or rectification or erasure of personal data related to him/her or restriction of their processing; the data subject has the right to object to their processing as well as the right to data portability or to revoke consent at

any time. The data controller regulates the data processing of the prize draw in a separate data processing statement.

Access to, rectification or erasure of personal data, restriction of their processing, data portability and objection to data processing may be initiated as per the following:

- by sending a letter addressed to 2146 Mogyoród, Móra Ferenc utca 12. via the postal service,
- by sending an email to info@tahitiresort.hu,
- by calling +36-50-120-4585.

Legal basis of data processing: consent of the data subject, Article 6 Section (1) Point a) of GDPR; Section 5 (1) of Info tv., Section 169 (2) of Act C of 2000 on Accounting, Section 13/A (3) of Act CVIII of 2001 on Electronic Commerce and on Information Society (hereinafter referred to as Elker tv.):

The service providers shall be authorized to process personal data in connection with providing the service, to the extent absolutely necessary for technical reasons. Where all relevant conditions remain unaltered, service providers shall install equipment for the provision of information society services - and operate under all circumstances - with facilities to ensure that the processing of personal data takes place only when it is absolutely necessary for providing the services and to meet the objectives set out in this Act; however, under no circumstances may they exceed the extent required in terms of time and volume.

Please be informed that the basis for data processing is your consent. If you wish to participate in the prize draw, you are obligated to provide the personal data. You may revoke your consent any time and request the erasure of your data.

As a negative consequence of your withdrawal of consent to data processing, you may not participate in the prize draw. The withdrawal of consent shall not affect the lawfulness of previous processing.

9.8. JOB ADVERTISEMENT

Processed data	Purpose of data processing
Surname and given name	Identification, communication
Telephone	Maintaining contact, establishing contact, identification, providing information
E-mail address	Establishing contact, maintaining contact, identification, providing information, communication
Data and information provided in the CV	Making enquiries about the suitability of the candidate

Scope of data subjects: All data subjects applying for the job.

Purpose of data processing: Informing candidates about the positions offered and the submissions, choosing and screening ideal candidates, establishing contact with candidates who apply.

Duration of data processing, deadline of data erasure: After choosing the ideal candidate for the position, the CVs, personal data and documents submitted/sent by candidates during the job application process are processed as follows:

- the data submitted/sent are stored for 1 year, they are automatically erased upon expiry of the deadline.

Potential data controllers entitled to know the data, personal data recipients: Personal data may be processed by the managers of the data controller, the managers of the company controlling the company group, the competent managers of companies with activities related to the service and contractual data processors while respecting the principles referred to above.

Description of the data subjects' rights related to data processing:

The data subject has the right to request from the controller access to or rectification or erasure of personal data related to him/her or restriction of their processing; the data subject has the right to object to their processing as well as the right to data portability or to revoke consent at any time.

- **Access to, rectification or erasure of personal data, restriction of their processing, data portability and objection to data processing may be initiated as per the following:**

- by sending a letter addressed to 2146 Mogyoród, Móra Ferenc utca 12. via the postal service,
- by sending an email to info@tahitiresort.hu,
- by calling +36-50-120-4585.

Legal basis of data processing: consent of the data subject, Article 6 Section (1) Point a) of GDPR; Section 5 (1) of Info tv., Section 169 (2) of Act C of 2000 on Accounting, Section 13/A (3) of Act CVIII of 2001 on Electronic Commerce and on Information Society (hereinafter referred to as Elker tv.):

The service providers shall be authorized to process personal data in connection with providing the service, to the extent absolutely necessary for technical reasons. Where all relevant conditions remain unaltered, service providers shall install equipment for the provision of information society services - and operate under all circumstances - with facilities to ensure that the processing of personal data takes place only when it is absolutely necessary for providing the services and to meet the objectives set out in this Act; however, under no circumstances may they exceed the extent required in terms of time and volume.

Please be informed that the **basis for data processing is your consent**. If you wish to apply for the position, you are **obligated** to provide the personal data. You may revoke your consent any time and request the erasure of your data.

As a negative **consequence** of your withdrawal of consent to data processing, we may not consider your application. The withdrawal of consent shall not affect the lawfulness of previous processing.

9.9 GOOGLE ANALYTICS

1. This website uses the service of Google Analytics, which is the web analyser service of Google Inc. („Google”).
Google Analytics uses so called „cookies”, textiles, which are saved on your computer, and they help the analysis of the website usage of the users.
2. The information created by the cookie about the website used by you will normally be stored and stored on a Google server in the USA.
By activating IP anonymization on the website, Google will shorten the User's IP address within the Member States of the European Union or in other States party to the Agreement on the European Economic Area.
3. The full IP address will be transmitted to and truncated to Google's server in the United States only in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate how the user has used the website, to provide the website operator with reports on website activity and to provide additional services related to website and internet usage.
4. Within the framework of Google Analytics, the IP address transmitted by the user's browser is not reconciled with other data of Google. The User may prevent the storage of cookies by setting their browser appropriately, however, please note that in this case, not all functions of this website may be fully available. You may also prevent Google from collecting and processing your information about your use of the Website (including your IP address) by cookies by downloading and installing the browser plugin available at the following link:
<https://tools.google.com/dlpage/gaoptout?hl=hu>

9.10. USING GOOGLE ADWORDS CONVERSION TRACKING

1. An online advertising program called "Google AdWords" is used by the data controller and uses Google's conversion tracking service. Google Conversion Tracking is an analytics service provided by Google Inc. (1600 Amphitheater Parkway, Mountain View, CA 94043, USA; "Google").
2. When a user accesses a website via a Google ad, a cookie to track conversion is placed on their computer.

These cookies have a limited validity and do not contain any personal data, so the user cannot be identified by them.
3. When the user browses certain pages of the website and the cookie has not yet expired, both Google and the data controller may see that the User has clicked on the advertisement.
4. Each Google AdWords customer receives a different cookie, so they cannot be tracked through AdWords customers' websites.
5. The information obtained through conversion tracking cookies is used to generate conversion statistics for AdWords Conversion Tracking customers. This is how customers find out the number of users who clicked on your ad and were redirected to a page with a conversion tracking tag. However, they do not have access to information that could identify any user.

6. If you do not wish to participate in conversion tracking, you can disable it by disabling cookies in your browser. You will then not be included in your conversion tracking statistics.

Further information and the Google Privacy Statement can be found at www.google.de/policies/privacy/.

10. MODE OF PERSONAL DATA STORAGE, SECURITY OF DATA PROCESSING

Our company's computer systems and other data storage devices can be found in the seat of the company and on the servers rented by the data processor. Our company selects and operates the information technology devices used to process personal data in the course of providing its services that

- a. the data processed are available to the authorised persons (availability);
- b. its authenticity and authentication are guaranteed (the authenticity of data processing);
- c. its integrity can be verified (data integrity);
- d. the data are protected against unauthorised access (data confidentiality).

We take special care of data security, furthermore we also take the technical and organisational measures and develop the procedural rules necessary to enforce the GDPR guarantees. We protect the data with appropriate measures against, in particular, unauthorised access, alteration, transmission, public disclosure, erasure or destruction, as well as unavailability due to accidental destruction, damage, and furthermore unavailability on grounds of alteration in the technologies used to access the data.

The computer system and network of our company and its partners are protected against computer fraud, computer viruses, theft via computers, and computer attacks whose purpose is service denial. The operator ensures a high level of safety through taking security measures both on the level of server and application. The daily backup of the data has been resolved. Our company takes every possible measure in order to avoid a personal data breach, and in the event that such personal data breach should take place we shall immediately take action – in accordance with our incident management rules - in order to minimize risk and to control damage.

- The guarantees of the web hosting service for maintaining an appropriate level of data security are the following:

The measures include, but are not limited to the following: (i) storing user data in a secure technological environment, not disclosing them to the public; (ii) the colleagues specified in this point below may only access user data upon appropriate verification, and they are the only ones with authorization to such access; (iii) TLS encrypted data transfer is used; (iv) data controller uses https protocol for data processing, thus the communication between user and server is through an encrypted connection; (v) natural persons authorized to access personal data may only process personal data as per the instructions from the controller; (vi) the pseudonymisation; (vii) storing data on the web hosting service's own server; (viii) data transfer towards the registry is encrypted; (ix) security measures are regularly, weekly and monthly tested and analysed, improved if needed; (x) verifying the identity of data subjects who wish to exercise their rights, so as to protect personal data and prevent unauthorized access. Within the organisation of the data controller, the following positions may have access to the personal data processed by the controller, pursuant to appropriate internal regulations: managing director, administrators, technical support staff, invoicing staff.

11. RIGHTS OF DATA SUBJECTS, REMEDIES

The data subject has the right to request information about the processing of his/her personal data, and request the rectification of his/her personal data, or – with exception of the mandatory data processing – request the erasure of his/her data or withdraw consent, or make use of his/her right to data portability and object to the manner specified at the time of data collection, or through the contact details of the data controller mentioned above.

Upon request of the data subject we shall provide the data in electronic format without delay, but latest within 30 days, in accordance with our relevant rules. We shall fulfil the requests of the data subjects with regards to the rights below free of charge.

Right of information:

Our company shall take appropriate measures to provide any information referred to in Articles 13 and 14 of the GDPR and any communication under Articles 15 to 22 and 34 of the GDPR relating to processing to the data subjects in a concise, transparent, intelligible and easily accessible form, using clear and plain language while remaining precise at the same time.

The right to information can be exercised in written form, through the contact details provided under Point 1. Upon request of the data subject – following the verification of his/her identity – information may be provided in oral form. We would like to inform our customers that if our company's employees have doubts with regards to the identity of the data subject, we may request further information necessary to confirm the personal identity of the data subject.

The data subject's right of access to data:

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed. Should his/her personal data be processed, the data subject shall have the right to get access to the personal data, and the following information included in the list below:

- Purposes of the data processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries (outside of the European Union) or international organisations;
- the envisaged period for which the personal data will be stored;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- information on the source of personal data; the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

In addition to the above, in the event that personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

The right to rectification:

According to this right anyone shall have the right to obtain from our company the rectification of inaccurate personal data or the completion of incomplete data concerning him or her.

The right of erasure:

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay:

- a. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b. the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- c. the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d. the personal data have been unlawfully processed;
- e. the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f. the personal data have been collected in relation to the offer of information society services.

The erasure of personal data cannot be initiated, if the data processing is necessary for any of the following purposes:

- a. for exercising the right of freedom of expression and information;
- b. for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- c. for reasons of public interest in the area of public health or for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes;
- d. for the establishment, exercise or defence of legal claims.

Right to restrict data processing:

We shall restrict data processing on the basis of Article 18 of GDPR, that is, where one of the following applies:

- a. the accuracy of the personal data is contested by the data subject, in this case the restriction applies to the period enabling the controller to verify the accuracy of the personal data;
- b. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead
- c. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- d. the data subject has objected to processing; in this case the restriction applies to the time period pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, the personal data shall, with the exception of storage, only be processed with the data subject's consent 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 reasons of important public interest of the European Union or of a Member State. The data subject shall be informed by the controller before the restriction of processing is lifted.

Right to data portability:

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and to transmit those data to another controller. Our company is able to fulfil such a request by the data subject in Word or Excel format.

The right to object:

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Automated individual decision-making, including profiling:

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. The above right cannot be applied, if the data processing

- a. is necessary for entering into, or performance of, a contract between the data subject and a data controller;
- b. is authorised by Union or Member State law to which the controller is subject, and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- c. is based on the data subject's explicit consent.

The right to withdraw consent:

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Procedural rules:

The controller shall provide information on action taken on a request under Articles 15 to 22 of GDPR to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.

If the controller does not take action on the request of the data subject, the controller 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 and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed,

unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

Damages and compensation:

Any person who has suffered material or non-material damage as a result of an infringement of this Regulation shall have the right to receive compensation from the controller or processor for the damage suffered. A processor shall be liable for the damage caused by processing only where it has not complied with obligations of this Regulation specifically directed to processors or where it has acted outside or contrary to lawful instructions of the controller. Where more than one controller or processor, or both a controller and a processor, are involved in the same processing and where they are, responsible for any damage caused by processing, each controller or processor shall be held liable for the entire damage.

A controller or processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage.

The right to apply to Court and the data protection authority procedure:

The data subject may apply to the court in the event that his/her rights have been infringed upon. The court gives the case priority.

Complaints are to be lodged with the Nemzeti Adatvédelmi és Információszabadság Hatóság (National Data Protection and Freedom of Information Authority). The authority's address: Hungary 1055 Budapest, Falk Miksa u. 9-11.; postal address: 1374 Budapest, Pf.: 603.; telephone: +36 1 391 1400; e-mail: ugyfelszolgalat@naih.hu

APPENDIX NO. 1

Detailed description regarding camera usage

Camera No.	Camera location	Purpose of operation	Area surveilled, subject of surveillance	Direct or recorded video footage	Storage time of video footage
1	Ground floor foyer	Protection of property	Elevator, garage entrance, staircase Incoming and outgoing guests	Recorded	Without need for utilisation, 72 hours
2	Ground floor garage	Protection of property	parking spaces, parking, garage condition	Recorded	Without need for utilisation, 72 hours
3	Gateway, entryway	Protection of property	parking spaces, gate condition, parking, incoming guests	Recorded	Without need for utilisation, 72 hours
4	Gateway, entryway	Protection of property	parking spaces, gate condition, parking, outgoing guests	Recorded	Without need for utilisation, 72 hours
5	Yard - parking spaces	Protection of property	parking spaces, parking	Recorded	Without need for utilisation, 72 hours
6	Yard - pool and sauna	Protection of property, protection of human health and life	Surveillance of the area of the swimming pool and sauna, checking compliance with house rules	Recorded	Without need for utilisation, 72 hours
7	First floor foyer	Protection of property	Elevator, staircase Incoming and outgoing guests	Recorded	Without need for utilisation, 72 hours
8	Second floor foyer	Protection of property	Elevator, staircase Incoming and outgoing guests	Recorded	Without need for utilisation, 72 hours
9	External street facade of the building	Protection of property	Main entrance and area in front of the building	Recorded	Without need for utilisation, 72 hours