

Privacy Statement

Flow Hotels Kft. (Tax ID: 25721555-2-42, hereinafter referred to as the Hotel) operates the Carlton Hotel Buda Castle, primarily offering hotel services.

The Hotel informs its customers, guests, and website visitors about the personal data it processes, its principles, and practices related to the handling of personal data, as well as the methods and possibilities for exercising the rights of the data subjects.

The Hotel is committed to protecting the personal data of its users and partners, valuing the right to informational self-determination of its clients. The Hotel declares that it respects the personal rights of its partners, clients, and website visitors. The recorded personal data is treated confidentially and in accordance with data protection laws and international recommendations, managed following the present data management policy, and every security, technical, and organizational measure is taken to ensure the security of the data.

The Hotel reserves the right to change this policy at any time and will inform its partners and guests about these changes.

Partners who engage in a customer relationship with the Hotel accept the following and consent to the data processing as described below.

Purpose and Scope of the Privacy Policy

The purpose of this Policy is to ensure that the Hotel complies with applicable data protection laws.

This Policy is effective from July 1, 2024, and remains in force until revoked.

This Policy applies to the Hotel, the individuals whose data is processed under this Policy, and those whose rights or legitimate interests are affected by the data processing.

This Policy covers all personal data processing activities carried out in all organizational units of the Hotel.

Definitions

- **Data Subject:** Any natural person identified or identifiable, directly or indirectly, based on any personal data.
- **Personal Data:** Any information relating to the Data Subject, especially the name, identification number, and one or more factors specific to the physical, physiological, mental, economic, cultural, or social identity of the Data Subject, as well as conclusions drawn from such data.
- **Consent:** The voluntary and explicit declaration of the Data Subject's will, based on appropriate information, by which they give their unambiguous consent to the processing of personal data concerning them, either fully or for specific operations.
- **Objection:** The statement by the Data Subject in which they object to the processing of their personal data and request the termination of the data processing or the deletion of the processed data.
- **Data Controller:** The natural or legal person, or an entity without legal personality, who alone or jointly with others determines the purposes and means of data processing and executes

the decisions related to data processing (including the means used) or has them executed by the Data Processor.

- **Data Processing:** Any operation or set of operations performed on data, regardless of the method used, including collection, recording, organization, storage, alteration, use, retrieval, transmission, disclosure, coordination or combination, blocking, deletion, and destruction, as well as preventing further use of the data, taking photographs, audio, or video recordings, and recording physical characteristics suitable for identifying the person.
- **Data Processor:** A natural or legal person, or an entity without legal personality, who processes data on behalf of the Data Controller based on a contract, including a contract based on legal provisions.
- **Data Processing Operations:** Technical tasks related to data processing, regardless of the methods and means used for the execution of the operations and the location of the application, provided that the technical task is performed on the data.
- **Third Party:** A natural or legal person, or an entity without legal personality, who is not the same as the Data Subject, the Data Controller, or the Data Processor.
- **Data Transfer:** Making the data accessible to a specified third party.
- **Public Disclosure:** Making the data accessible to anyone.
- **Data Deletion:** Making the data unrecognizable in such a way that their restoration is no longer possible.
- **Data Marking:** Labeling data with an identifier to distinguish it.
- **Data Blocking:** Labeling data with an identifier to limit its further processing temporarily or permanently.
- **Data Destruction:** Complete physical destruction of the data carrier containing the data.

Conditions for Processing Personal Data

Personal data may be processed by the Hotel if:

- a) The Data Subject has given their consent, or
- b) It is ordered by law or, within the scope defined therein, by a local government decree based on the public interest (mandatory data processing).

Personal data may also be processed if obtaining the Data Subject's consent is impossible or would involve disproportionate costs, and the processing of personal data is necessary for the fulfillment of the Data Controller's legal obligations or for the legitimate interests of the Data Controller or a third party, provided that enforcing these interests is proportionate to the restriction of the right to the protection of personal data.

The declaration of a legally incompetent person and a minor under the age of 16 with limited legal capacity requires the consent of their legal representative, except for those parts of the service that involve everyday data processing and do not require special consideration.

If the Data Subject is unable to give consent due to incapacity or other unavoidable reasons, their personal data may be processed to the extent necessary for the protection of their or another person's vital interests, as well as for the prevention or elimination of a direct threat to the life,

physical integrity, or property of individuals during the existence of the obstacles to obtaining consent.

If the personal data were recorded with the consent of the Data Subject, the Data Controller may process the recorded data without further consent or after the withdrawal of the Data Subject's consent, provided that the processing is necessary for the fulfillment of the Data Controller's legal obligations or for the legitimate interests of the Data Controller or a third party, and enforcing these interests is proportionate to the restriction of the right to the protection of personal data.

Personal data may only be processed for specific purposes, to exercise rights, and to fulfill obligations. At all stages of data processing, the purpose must be adhered to, and data collection and processing must be conducted fairly.

Only personal data that is essential for achieving the purpose of data processing, suitable for achieving the purpose, and only to the extent and duration necessary for achieving the purpose may be processed.

Personal data may only be processed with the informed consent of the Data Subject.

The Data Subject must be informed before data processing begins whether the data processing is based on consent or is mandatory. The Data Subject must be clearly, comprehensively, and thoroughly informed of all facts related to the processing of their data, including the purpose and legal basis of the data processing, the person authorized to process and control the data, the duration of the data processing, and who can access the data. The information must also cover the Data Subject's rights related to data processing and the available legal remedies.

During data processing, the accuracy, completeness, and timeliness of the data must be ensured, and the Data Subject may only be identified for the time necessary for achieving the purpose of the data processing.

Employees conducting data processing at the Hotel's organizational units are obliged to treat the personal data they become aware of as business secrets. Persons handling and accessing personal data are required to sign a Confidentiality Agreement.

Scope, Purpose, Legal Basis, and Duration of Data Processing

The Data Controller processes personal data solely for specified purposes, to exercise rights, and to fulfill obligations. Data processing at all stages complies with the purpose of data processing. Data collection and processing are conducted fairly and legally. The Data Controller strives to only process personal data that is essential for achieving the purpose of data processing and suitable for achieving that purpose. Personal data may only be processed to the extent and duration necessary for achieving the purpose. Data providers are reminded that if they do not provide their own personal data, it is their responsibility to obtain the consent of the Data Subject.

Data Processing on the Website

a) The legal basis for data processing on the website is the User's consent or Section 13/A (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services.

b) Scope of data processed: date and time of visit, IP address of the User's computer, type of browser, name, phone number, email address, date and time, number of adults, number and age of children, type of services used, and other personal data provided by the User.

c) Deadline for data deletion: 5 years from room reservation; immediately if no contract is concluded following a request for a quote; until the withdrawal of consent for newsletters. Accounting documents are retained for 8 years as per Section 169 (2) of Act C of 2000 on Accounting.

d) The deletion or modification of personal data can be initiated as follows:

- By mail (1011 Budapest, Apor Péter utca 3)
- By email (info@carltonhotel.hu)

e) Users are informed that courts, prosecutors, investigative authorities, administrative authorities, the data protection commissioner, and other authorized bodies may request information, data provision, transfer, or access to documents from the Service Provider based on legal authorization.

f) The Hotel will only disclose personal data to the authorities to the extent and in a manner necessary to fulfill the purpose of the request, provided that the authority specifies the exact purpose and scope of the data.

g) The Hotel processes the data provided by the guests, which are necessary for fulfilling the service, in accordance with Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information.

h) The Hotel processes personal data for the purpose of providing services (e.g., full use of the website, such as booking, sending newsletters) only to the necessary extent and duration. Data processing at all stages complies with this purpose.

i) The Hotel also processes personal data that are technically essential for providing the service. If personal data is technically essential, the Hotel will inform the guests clearly, comprehensively, and thoroughly of all facts related to the data processing, including the purpose and legal basis of the data processing, the person authorized to process the data, the duration of the data processing, and who can access the data. The information must also cover the guests' rights related to data processing and the available legal remedies.

j) In addition, the Hotel only collects such information about the Users (IP address, time of use, visited website, browser program, and one or more cookies enabling the unique identification of the browser) that is solely for the development and maintenance of the Services and for statistical purposes uses up. The Service Provider uses data processed for these statistical purposes only in a form that is not suitable for personal identification. In order to improve the quality of the Services, the Hotel stores a file containing a series of characters on the User's computer, so-called places a cookie if the User consents to this. If the User does not agree, this will be indicated in advance in the "Data management on the website" chapter d. at the contact details specified in

k) The Hotel transfers the personal data it manages to a third party only for the purpose of developing and/or operating some of the hotel's services used by the User. The Hotel does not use the personal data it manages for the purposes of third parties, and does not abuse them in any other way.

l) The Websites also contain links to external servers (not managed by the Hotel), the pages accessible through these links may place their own cookies or other files on the computer, collect data or request personal data. The Hotel excludes all responsibility for these.

m) By using the service, the User consents to the Hotel collecting and managing his personal data in accordance with the provisions of this data protection information sheet, for the purpose of fully providing the service.

Newsletter, DM activity

a) XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activity. Pursuant to § 6 of the Act, the User expressly consents in advance to the hotel's advertising offers and other mailings being sought at the contact details (e.g. e-mail address or telephone number) provided at the time of registration.

b) Furthermore, taking into account the provisions of this information, the Customer consents to the hotel handling his personal data necessary for sending advertising offers.

c) The Hotel does not send unsolicited advertising messages, and the User may unsubscribe from the sending of offers free of charge without limitation or justification. In this case, the hotel deletes all personal data necessary for sending advertising messages from its records and does not contact the User with further advertising offers. Users can unsubscribe from advertisements by clicking on the link in the message.

d) Purpose of data management: sending electronic newsletters containing commercial advertising messages to the User, providing information on current information and products.

e) Legal basis for data management: the voluntary consent of the concerned person and XLVIII of 2008 on the basic conditions and certain limitations of economic advertising activities. § 6 (5) of the Act.

f) Scope of processed data: name, e-mail address, phone number, date, time.

g) Data deletion deadline: until withdrawal of consent, i.e. until unsubscription.

Data security

a) The Hotel takes all necessary security steps, organizational and technical measures in order to ensure the highest level of security of personal data and to prevent their unauthorized change, destruction and use.

b) The hotel takes all necessary measures to ensure data integrity, i.e. to ensure the accuracy, completeness and up-to-date status of the personal data it manages and/or processes.

c) The Hotel protects the data with appropriate measures, in particular against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction, damage, and inaccessibility resulting from changes in the technology used.

d) The Hotel therefore reserves the right to inform its customers and partners of any security holes in its system if it detects a security hole on the part of its customers or partners, and at the same time restrict access to the Service Provider's system and services, or some of its functions, until the security hole is eliminated.

e) In order to ensure the security of the data stored on the network, the Hotel avoids data loss by continuous mirroring on the server.

f) The Hotel performs a daily backup of the active data of the databases containing personal data.

- g) On the network handling personal data. The Hotel constantly takes care of virus protection.
- h) Access to data and data files managed on the Hotel's network must be provided with a username and password.

Information on data management

- a) The User may request information about the management of his personal data, and may request the correction of his personal data or - with the exception of the data management mandated by law - the deletion of his personal data in the manner indicated at the time of data collection or at the Service Provider's indicated contact details.
- b) At the user's request, the hotel provides information about the data it manages, its source, the purpose, legal basis, and duration of the data management. The Hotel shall provide the information in writing in an understandable form as soon as possible, but no later than 30 days after the submission of the request.
- c) The hotel will correct the personal data if it does not correspond to the reality, and the personal data corresponding to the reality is at its disposal.
- d) The Hotel blocks the personal data if the User requests it, or if, based on the information available, it can be assumed that deletion would harm the User's legitimate interests. Locked personal data can only be processed as long as the data management purpose that precluded the deletion of personal data exists.
- e) The Hotel deletes the personal data if its processing is illegal, the User requests it, the processed data is incomplete or incorrect - and this situation cannot be legally remedied - provided that the deletion is not precluded by law, the purpose of the data management has ceased, or the storage of the data the statutory deadline has expired, it was ordered by the court or the National Data Protection and Freedom of Information Authority.
- f) The data manager has 30 days to delete, block or correct personal data. If the hotel does not comply with the User's request for correction, blocking or deletion, it shall notify the reasons for the refusal in writing within 30 days.
- g) The hotel notifies the Customer of the correction, blocking and deletion, as well as all those to whom the data was previously transmitted for the purpose of data management. The notification is omitted if this does not violate the User's legitimate interests in view of the purpose of the data management.

Control

- a) The managers of the organizational unit performing data management at the Hotel are obliged to continuously check compliance with the regulations related to data protection, especially the provisions of this regulation.
- b) The hotel and operations manager and the data protection officer appointed by him check the data managed at the Hotel once a year.

Legal remedy

- a) The user may object to the processing of his personal data if

II. the processing or forwarding of personal data is necessary only to fulfill the legal obligation of the Service Provider, or to enforce the legitimate interests of the Service Provider, the data recipient or a third party, unless the data processing is mandated by law;

III. personal data is used or forwarded for the purpose of direct business acquisition, public opinion polls or scientific research;

ARC. in other cases specified by law.

b) The hotel examines the objection as soon as possible, but no later than 15 days after the submission of the application, makes a decision on its validity, and informs the applicant of its decision in writing. If the hotel establishes that the protest of the person concerned is well-founded, it will terminate the data management - including further data collection and data transmission - and block the data, as well as notify all those to whom the personal data affected by the protest was previously transmitted about the protest and the measures taken based on it. and who are obliged to take measures to enforce the right to protest.

c) If the User does not agree with the hotel's decision, he/she may appeal to the court within 30 days of its notification.

d) In the event of a violation of his rights, the user may go to court against the hotel. The court acts out of sequence in the case. Legal remedies and complaints can be made at the National Data Protection and Freedom of Information Authority:

National Data Protection and Freedom of Information Authority

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Post address: 1530 Budapest, Postafiók: 5.

Telephone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail: ugyfelszolgalat@naih.hu