

BalatonHost Balatonaráczt. Privacy and Data Handling Policy General Provisions

- I. THE SERVICE PROVIDER AS DATA CONTROLLER
- II. Balatonaráczt. Tax number: 27268803-2-19
- III. Registered office: 8230 Balatonfüred, Lóczy Lajos u. 1.

(hereinafter referred to as the "Data Controller") The Data Controller, as the operator of BalatonHost (hereinafter: Accommodation Intermediary), hereby informs its clients, guests, and visitors to its website (hereinafter collectively referred to as: data subject(s), user(s) or guest(s)) that it respects the rights of its Guests, therefore, in its data processing, it acts in accordance with the following data handling policy (hereinafter: Policy). The Data Controller reserves the right to modify the Policy due to changes in legal background and other internal regulations. The current version of the privacy policy is always available on the website www.balatonhost.hu and also available in paper form at the Accommodation Intermediary office. This policy regulates data processing activities related to the services provided by BalatonHost located at 1 Lóczy Lajos Street, 8230 Balatonfüred, and accessible through the website.

II. PURPOSE OF THE POLICY • The primary purpose of this policy is to define and comply with the fundamental principles and provisions regarding the handling of data of natural persons, Guests, who come into contact with the Accommodation Intermediary office, in order to ensure the protection of the privacy of natural persons in accordance with the relevant legal requirements. • Referring to the provisions defined in I.1, the purpose of this policy is to ensure that the Accommodation Intermediary office complies with the applicable legal provisions on data protection, including but not limited to: • the Act CXII of 2011 on informational self-determination and freedom of information, • Act CVIII of 2001 on certain issues of electronic commerce services and information society services, • Act XLVII of 2008 on the prohibition of unfair commercial practices against consumers, • Act XLVIII of 2008 on the essential conditions and certain limitations of commercial advertising activities. • The Data Controller considers it particularly important and is committed to protecting the data provided by the data subjects through the website or other forums, as defined by Act CXII of 2011 on informational self-determination and freedom of information, and to respect the informational self-determination rights of the data subjects. In this context, by fully complying with the relevant applicable legal provisions, it contributes to providing secure internet access to data subjects.

III. SCOPE OF THE POLICY • Temporal scope: This Policy is effective from May 25, 2018, until further notice or withdrawal. • Personal scope: This Policy applies to the Accommodation Intermediary office, to individuals whose data falls under the scope of data processing covered by this Policy, and to individuals whose rights or legitimate interests are affected by data processing. • Subject scope: This Policy applies to all personal data processing activities carried out within the entire organizational unit of the Accommodation Intermediary office.

IV. DEFINITIONS • Data subject or User or Guest: any identified or identifiable natural person based on specific personal data; • Personal data: any information relating to an identified or identifiable natural person - in particular the name, identifier, and one or more factors specific to the physical, physiological, mental, economic, cultural, or social identity of that natural person - and any inference drawn from such information regarding that natural person; • Hotel: accommodations listed in the portfolio of BalatonHost, operated by the Data Controller; • Consent: the voluntary and specific expression of the data subject's will, based on appropriate information, by which the data

subject gives unambiguous consent to the processing of personal data concerning them, in whole or in part.

- Data Controller: a natural or legal person, or an organization without legal personality, who or which determines the purpose of data processing independently or jointly with others, makes and executes decisions regarding data processing (including the means used), or executes them with a data processor appointed by them;
- Data Processing: any operation or set of operations performed on data, irrespective of the method or means used, including, in particular, collection, recording, organization, storage, alteration, use, querying, transmission, disclosure, dissemination, alignment, combination, blocking, erasure, or destruction of data, as well as preventing further use of data, taking photographs, making audio or visual recordings, and recording physical characteristics suitable for identification;
- Data Transmission: making data accessible to a specified third party;
- Data Processing: performing technical tasks related to data processing operations, regardless of the method and means used for executing the operations and the location of the application, provided that the technical task is performed on the data;
- Place of Data Processing: on paper
- Data Deletion: rendering data unidentifiable in such a way that their restoration is no longer possible;
- Data Blocking: marking data with an identifier to restrict their further processing permanently or for a specified period;
- Data Destruction: complete physical destruction of the data carrier containing the data;
- Data Set: the entirety of data managed in a register;
- Third Party: a natural or legal person, or an organization without legal personality, who or which is not the data subject, the data controller, or the data processor;
- Data Protection Incident: unlawful handling or processing of personal data, in particular unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as accidental destruction and damage;

- Website: the www.balatonhost.com portal and all its subpages, operated by the Data Controller;

- Facebook Page: the page located at <https://www.facebook.com/balatonfurediszallasok/>, the maintenance of which is carried out by the Data Controller.

V. PRINCIPLES OF DATA PROCESSING

- Principle of Proportionality and Necessity: Only personal data that is indispensable for the realization of the purpose of data processing and suitable for achieving the purpose may be processed. Personal data may only be processed to the extent and for the duration necessary to achieve the purpose.
- Principle of Purpose Limitation: Personal data may only be processed for specified purposes, in the exercise of rights, and in fulfillment of obligations. At all stages of data processing, it must comply with the purpose of data processing, and the collection and processing of data must be fair and lawful.
- The personal data shall retain its quality throughout the data processing until the connection with the data subject can be restored. The connection with the data subject can be restored if the data controller has the technical conditions necessary for restoration.
- Accuracy, Completeness, and, if necessary, currency of data must be ensured during data processing, and the data subject must be identifiable only for the time necessary for the purpose of data processing.
- Principle of Voluntariness: The provision of data by the data subject is voluntary. The Data Controller processes personal data with the consent of the data subject. Voluntary consent must be understood as the user behavior by which the user accepts that all regulations regarding the use of the website automatically apply to them when using the website.

VI. STATEMENTS OF THE DATA CONTROLLER

- The Data Controller declares that, during data processing, it complies with the provisions of Act CXII of 2011 on informational self-determination and freedom of information.
- b. during data processing, only those persons

employed by the Data Controller who have tasks related to the data processing concerned may become acquainted with the personal data that has come to the knowledge of the Data Controller. c. ensures that the current regulations are continuously accessible to the data subject, thereby implementing the principle of transparency. d. the website processes the personal data of visitors confidentially, in compliance with the applicable legal regulations, ensures their security, takes technical and organizational measures, and establishes procedural rules to fully comply with the principles of data protection. e. treats the personal data of Guests staying in the Hotel confidentially, in compliance with the applicable legal regulations, ensures their security, takes technical and organizational measures, and establishes procedural rules to fully comply with the principles of data protection.

f. In order to preserve the data it manages, it takes all measures necessary to promote secure data processing and transmission related to data storage, processing, and transmission. g. It takes all necessary steps in an appropriate manner to protect the personal data it manages against unauthorized access, alteration, disclosure, deletion, damage, and destruction by ensuring the necessary technical conditions. h. It does not verify the personal data provided to it and excludes its liability for their accuracy. i. It only transmits personal data to third parties in exceptional cases and only connects the database it manages with another data controller in cases where the data subject expressly consents or the law permits, and if the conditions for data processing are met for each individual personal data. j. It operates exclusively in Hungary, does not belong to any multinational hotel chain, and therefore is not required to introduce and maintain organizational regulations. k. It does not transfer personal data to a data processor or data controller in a third country. l. For the purpose of monitoring measures related to data protection incidents and informing the data subjects, it maintains a record containing the scope of personal data of the data subjects, the scope and number of persons affected by data protection incidents, the time, circumstances, effects, and measures taken to remedy the incidents, as well as other data specified in the legislation prescribing data processing. • It excludes its liability for the lawfulness of the data processing of its contractual partner. • By applying appropriate security measures, it ensures the protection of personal data stored in automated data sets against accidental or unlawful destruction or loss, as well as unauthorized access, alteration, or dissemination.

VII. SCOPE OF ACTIVITIES AND DATA AFFECTED BY DATA PROCESSING

VII.1 Use of Services • In the provision of office services, the processing of all data relating to the data subject is based on voluntary consent and aims to ensure the provision of the service and maintain contact. The personal data contained in this section is kept by the data controller for the required period in accordance with the applicable tax and accounting regulations and is deleted after the deadline. • Additional data may be provided for certain services to help fully understand the guest's needs, but this is not a prerequisite for using the hotel services.

VII.2 Request for Quotation¹ • When requesting a quotation through the website, the data controller requests/mandates the guest to provide the following data: • * Name: • * Email: • * Phone: • * Arrival: • * Departure: • * Adults: • Children: • Age of children: • Message: 1 Data marked with * are mandatory to fill out. • The request for quotation is voluntary. • The activity and process affected by the data processing are as follows: a. By clicking on one of the hotel offers on the website, the user reaches the subpage of the respective hotel, where they can request our offer. By filling out the "ONLINE QUOTATION REQUEST BOOKING" form, the data specified in section VI.2.1 can be provided. After providing the data, accepting the terms and policies, the user can send the specified data to the data controller by pressing the "Send" button.

b. The data sent to the data controller are processed by an employee working in the room reservation department using the booking program Digithotel.hu. The received data is recorded, and an offer is prepared for the guest, which is then sent to them via email.

The activities and processes related to data processing are as follows:

a. If the data subject accepts the offer and informs the Data Controller in writing, the Data Controller takes the necessary steps for the room reservation.

b. An employee of the Data Controller working in the position of room reservation assistant, who is in an employment relationship with the Data Controller, enters the data provided by the data subject into the DIGITHOTEL.HU program and, using this program, links them to the accommodation offered by the Accommodation Agency, thereby creating the room reservation.

c. The employee, as defined above, notifies the data subject in writing about the room reservation.

VII.4 Check-in and the Registration Form

- Upon arrival at the Accommodation Agency, the data subject fills out an online accommodation registration form before occupying the reserved accommodation, in which they consent to the Data Controller processing the data provided below in accordance with the relevant legal regulations (in particular, the regulations concerning immigration and tourism taxes) to fulfill its legal obligations, verify the guest's identity, and process and archive this data until the competent authorities can verify compliance with the specified legal obligations: • Last name* • First name* • Address* • Date of birth* • Date of arrival* • Date of departure* • Identification number* The fields marked with * are mandatory

- Providing the mandatory data is a condition for using the services of the Accommodation Agency. • By signing the registration form, the guest agrees that the Data Controller will process and archive the data provided in the registration form for the purpose of concluding or fulfilling the contract and, if necessary, for enforcing claims within the specified period.

- By providing their email address on the registration form, the guest has the option to subscribe to the Data Controller's newsletter. Regarding the newsletter, the provisions in Section VI.6 apply.

VII.5 Newsletter Sending

- The data subject can subscribe to the newsletter via the website, by email, or in the Accommodation Agency while using certain services or on paper using the data specified below. • The scope of processed data includes: • Last name* • First name* • Email address* The fields marked with * are mandatory. • Subscribing to the newsletter is voluntary. • The purpose of data processing related to newsletter sending is to inform the recipient comprehensively or personally about the latest promotions of the Data Controller.

- The Data Controller sends the newsletter only with the consent of the data subject.

- The provided personal data is stored by the Data Controller on a separate list and is only accessible to authorized employees and data processors of the Data Controller.
- The Data Controller does not forward the list or the data to third parties and takes all necessary security measures to prevent unauthorized access.
- The Data Controller processes the personal data collected for this purpose only until the data subject unsubscribes from the newsletter.
- The data subject can unsubscribe from the newsletter at any time, either at the end of the emails or by sending an unsubscribe request to the email address szallas@balatonhost.com.
- The Data Controller reviews the newsletter list every five years and requests a confirmation of consent to newsletter sending after five years. The data of a data subject who does not provide confirmation for newsletter sending will be deleted by the Data Controller within 30 days after the delivery of such an email.
- The Data Controller keeps statistics on the readability of the newsletters sent and on the clicks on links in the newsletters.
- The Guest can subscribe to the news feed posted on the messaging wall on the Facebook page by clicking on the "like" link found on the page, and they can unsubscribe by clicking on the "dislike" link found in the same place, or they can delete unwanted news feeds appearing on the messaging wall using the settings of the messaging wall.

VII.8 Facebook Page • The Data Controller and the accommodations operated by the Data Controller are available on the Facebook social platform. • The purpose of data processing is to share the contents available on the website. Through the Facebook page, the Guest can stay informed about the latest promotions. • By clicking on the "like" link on the Data Controller's Facebook page, the data subject consents to the publication of the Data Controller's news and offers on their own messaging wall. • The Data Controller also posts pictures/videos of various events on the Facebook page. If it is not a mass event, the Data Controller always obtains the data subject's written consent before posting pictures. • Information about the data processing on the Facebook page can be found in the privacy guidelines and regulations on the Facebook website, at www.facebook.com.

VII.9 Website Visit Data

- VII.9.1 References and Links • The Data Controller's website may contain links that are not operated by the Data Controller but only serve to inform visitors. The Data Controller has no influence over the content and security of websites operated by partner companies and therefore assumes no responsibility for them. • Please review the Data Policy and Privacy Statement of the websites you visit before providing your data in any form on those sites.
- VII.9.2 Analytics, Cookies • The Data Controller uses analytical tools to track its websites, creating a dataset that monitors how visitors use the websites. The system creates a cookie when the page is visited to record information related to the visit (visited pages, time spent on our pages, browsing data, exits, etc.), which, however, cannot be linked to the visitor's identity. This tool helps improve website design, create user-friendly websites, and enhance visitors' online experience. The Data Controller does not use analytical systems to collect personal information. While most internet browsers automatically accept cookies, visitors have the option to delete them or automatically

reject them. Since every browser is different, visitors can individually adjust their preferences regarding cookies using the browser toolbar. It is possible that certain features may not be available on our website if you decide not to accept cookies.

VIII. STORAGE OF PERSONAL DATA, INFORMATION SECURITY • Personal data can only be processed in accordance with the activities described in Chapter VI, based on the purpose of data processing. • Purpose of data processing: contacting and communicating with the data subject, marketing, improving the quality of services that fit the Data Controller's profile, conducting market research, and surveying consumer habits for this purpose. • Legal basis for data processing: the data subject's voluntary consent based on prior information provided by the Data Controller. • Duration of data processing: for 15 working days from the termination of the client relationship, unless the data needs to be used for the enforcement of rights and obligations arising from the client relationship, or until the data subject requests deletion of their data or withdraws their consent for data processing. • Requests for modifying or deleting personal data, withdrawing voluntary consent, and requesting information on the processing of personal data can be made by sending a notification to the contact details provided. • The Data Controller ensures that:

- Personal data provided by the data subject is only associated with the data specified and in the manner defined in this policy.
- Only those employees of the Data Controller who require access to perform their duties have access to personal data.
- All data modifications are marked with the date of modification.
- Incorrect data will be deleted within 24 hours upon request of the data subject.
- Data is backed up regularly. • The Data Controller provides the expected level of protection for data processing, including storage, correction, and deletion, when responding to requests for information or objections from the data subject.

• Data transmission occurs with the consent of the data subject, without prejudice to their interests, confidentially, and ensuring full compliance with the purpose, legal basis, and principles of data processing, while providing an appropriate IT system. The Data Controller does not transmit the personal data of the data subject without their consent, does not make it accessible to third parties, except if required by law. • Other data that cannot be directly or indirectly related to the data subject and cannot be identified - hereinafter referred to as anonymous data - do not qualify as personal data. IX.

REMEDIES

- The data subject may request information about the processing of their personal data, and may request the correction, deletion, or blocking of their personal data, except for data processing required by law, via email, or in accordance with the activities involving data processing as recorded therein.
- Upon request, the Data Controller provides information to the data subject about the data it manages, the purpose of data processing, its legal basis, duration, the data processor's data, if a data processor is involved, information on data protection incidents, their circumstances, impacts, and the measures taken to mitigate them, and, in the case of data transmission, the legal basis, purpose, and recipient of the data transmission.
- The Data Controller corrects or deletes personal data that is not accurate or no longer necessary if: a. Its processing is unlawful; b. The data subject requests it; c. It is incomplete or incorrect, and this cannot be lawfully remedied, provided that deletion is not prohibited by law; d. The purpose of data processing has ceased, or the statutory storage period has expired; e. It is ordered by a court or the National Authority for Data Protection and Freedom of Information.

- The Data Controller notifies the data subject of the correction or deletion, as well as those to whom the data was previously transmitted for the purpose of data processing. Notification may be omitted if it does not prejudice the legitimate interests of the data subject concerning the purpose of data processing.
- The data subject may object to the processing of their personal data if: a. The processing (transmission) of personal data is necessary for the exercise of the Data Controller's or the recipient's rights or legitimate interests, except in cases of mandatory data processing; b. The use or transmission of personal data is for direct marketing, public opinion research, or scientific research purposes; c. The exercise of the right to object is otherwise permitted by law.
- With the simultaneous suspension of data processing, the Data Controller examines the objection within the shortest possible time, but no more than 15 working days from the submission of the request, and informs the applicant in writing of the outcome. If the applicant's objection is justified, the Data Controller terminates the data processing - including further data collection and transmission - and locks the data, and informs those to whom the personal data affected by the objection was previously transmitted, and who are required to take action to enforce the right of objection.
- If the data subject disagrees with the Data Controller's decision or if the Data Controller misses the deadline referred to in point 6, the data subject is entitled to appeal to the court within 30 days from the notification.
- In the event of a breach of the right to informational self-determination, a complaint can be lodged:
- National Authority for Data Protection and Freedom of Information Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c Phone: +36 (1) 391-1400 Fax: +36 (1) 391-1410 Website: <https://www.naih.hu> Email: ugyfelszolgalat@naih.hu
- In case of violation of rights related to minors, incitement to hatred, exclusion, rectification, violation of the rights of deceased persons, or defamation of reputation: National Media and Infocommunications

Authority Address: 1015 Budapest, Ostrom u. 23-25. Mailing address: 1525. Pf. 75 Tel: (06 1) 457 7100 Fax: (06 1) 356 5520 Email: info@nmhh.hu

X. OTHER PROVISIONS This regulation shall enter into force

on May 20, 2018. Balatonfüred, May 20, 2018

Zsuzsanna Rácz Executive Contact information

Address: 8230 Balatonfüred, Lóczy Lajos u. 1.