

# **Lujza & Koriander**

## **PRIVACY POLICY**

### **ON THE PROCESSING OF PERSONAL DATA OF THE DATA SUBJECT**

This Data Protection Policy (hereinafter referred to as the "Privacy Policy") contains the consolidated information of the **Lujza & Koriander** (hereinafter collectively referred to as the "**Hotel/Controller**") on the data controller's activities of the Hotel and the Café for data subjects, in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 20 December 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation) (2016. (hereinafter "**GDPR Regulation**") and Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter "**Infotv.**") and other relevant legislation to ensure the protection of personal data.

In the interests of the security of personal data, as data controller, we will take the necessary and appropriate measures to provide our online users, when browsing the <http://lujzaeskoriander.hu/> website, our guests and other data subjects with all information concerning the processing of their personal data in a concise, transparent, intelligible and easily accessible form, in a clear and plain language, and to facilitate the exercise of **your rights as a data subject**.

Please be informed that, separately from this Privacy Policy, we will inform our non-guest contracting partners and customers in writing of our customer data protection law-compliant customer data processing in the context of the resulting contract, given that it only provides for rights and obligations applicable to our customers in the context of the activities concerning our contracting customers and only for our customers. Thus, this Privacy Policy covers on-site processing of our guests and processing related to the use of our website, and also includes our information on processing related to our social media presence.

Any use, copying, reproduction of the text and contents of this Privacy Policy by any third party, for its own purposes or for the purposes of any other person, without consent, or any reproduction of the whole or any part of the text, is prohibited and may only be made by the lawyer who prepared this Privacy Policy. Our accommodation may, at its sole discretion, change the text of this Privacy Policy in accordance with its privacy practices.

Where this brochure refers to an Accommodation, this should be understood to include, where relevant to the nature of the activity, the Café as a breakfast restaurant and café venue.

This Privacy Policy is attached as Annex 1 to the Privacy Policy available at the registered office of our Accommodation (hereinafter referred to as the "Policy").

Please read the contents of this Privacy Policy carefully and contact us if you have any questions.

## **CHAPTER I**

### **NAME OF THE CONTROLLER AND PROCESSORS**

**Name of data controller**

The publisher of this Privacy Policy and the Data Controller/Occupier/Café:

**Lujza és Koriander Korlátolt Felelősségű Társaság**

Location: 2600 Vác, Ady Endre sétány 5.

Company registration number: 13-09-204981

Tax number: 25958625-2-13

represented by: László Dániel Pajor and Tibor Levente Pajor, managing directors individually

They are considered as an additional controller in relation to the accommodation service:

László Dániel Pajor and Tibor Levente Pajor are private accommodation providers.

It may be an additional controller for certain activities related to events:

Hangyavár Real Estate Ltd.

Headquarters: 2600 Vác, Dr. Csányi László körút 51.

Company registration number: 13-09-150937

Tax number: 23559615-2-13

represented by: László Dániel Pajor and Tibor Levente Pajor, managing directors individually

(hereinafter jointly referred to as Lujza and Koriander/Accommodation/Administrator)

### **Name of data processors**

Our accommodation is the controller of the personal data of the data subjects. In addition, we use partners who are data processors to provide our services and activities. Processors are bound by confidentiality obligations in respect of the data thus obtained. Processors process personal data in accordance with the contract between them and our accommodation as data controller, for the purposes of performing their tasks.

In order to use a data processor, our accommodation is not required by law to obtain the prior consent of the data subject, but it is necessary to inform the data subjects. Accordingly, our accommodation shall inform the data subjects of the data and contact details of the data processors which may process the personal data transmitted to them by our accommodation as data controller for the security of our guests, for the purpose of providing faster and more convenient administration and services, strictly for the purposes specified therein.

### **1. Our external contracting partners for booking and sales**

For the processing of the data of the guest concerned in the course of reservations and sales, our accommodation uses external contractors who provide the related IT and other services on their own systems, through their own network, and in this context, under the scope of their own data management policy, process the personal data transmitted to them and, if necessary for the performance of the operation carried out by them, store the personal data transmitted on their servers. For more detailed information on data processing and the duration of data storage, please contact our partners. You will find the names of these partners in **the register of processing activities**, which is annexed to this notice.

We inform our guests that their data transferred to these partners will only be subject to our Privacy Policy if their data is received by our system. Prior to this, their data will be processed by our sales intermediary partners.

Once your data is received by our system, it will be processed in full accordance with this Policy.

### **2. Our IT, security and financial data partners**

Our accommodation uses external service providers for the provision of IT, security and financial services, who process the personal data of the natural persons concerned in accordance with the provisions of Chapter V of this Privacy Policy. The names of these data processors are listed in the register of data processing activities annexed to this Privacy Policy.

## **CHAPTER II DEFINITIONS**

For the purposes of this Privacy Policy - in accordance with Article 4 of the GDPR Regulation:

- (1) "*personal data*" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- (2) "*processing*" means any operation or set of operations which is performed upon personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
3. "*restriction of processing*": the marking of stored personal data for the purpose of restricting their future processing;
- (4) "*profiling*" means any form of automated processing of personal data whereby personal data are used to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict characteristics associated with that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- (5) "*pseudonymisation*" means the processing of personal data in such a way that it is no longer possible to identify the natural person to whom the personal data relate without further information, provided that such further information is kept separately and technical and organisational measures are taken to ensure that no link can be established between the personal data and identified or identifiable natural persons;
- (6) "*controller*" means a natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of the processing are determined by Union or Member State law, the controller or the specific criteria for the designation of the controller may also be determined by Union or Member State law;
- (7) "*processor*" means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller;
- (8) "*recipient*" means a natural or legal person, public authority, agency or any other body to whom or with which personal data are disclosed, whether or not a third party. Public authorities which may have access to personal data in the context of an individual investigation in accordance with Union or Member State law are not recipients; the processing of those data by those public authorities must comply with the applicable data protection rules in accordance with the purposes of the processing;
- (9) "*third party*" means a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor or the persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- (10) "*data subject's consent*" means the freely given, specific, informed and unambiguous indication of his or her wishes by which the data subject signifies, by a statement or by an act expressing his or her unambiguous consent, that he or she signifies his or her agreement to the processing of personal data concerning him or her;

- (11) *"data breach"* means a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
12. *"Consent"*: a voluntary and explicit expression of the data subject's wishes, based on adequate information, by which he or she gives his or her unambiguous consent to the processing of personal data concerning him or her, either in full or in relation to specific operations.
13. *"Objection"*: a statement by the data subject objecting to the processing of his or her personal data and requesting the cessation of the processing or the erasure of the processed data.
- (14) *'processing'* means the performance of technical tasks related to data processing operations, irrespective of the method and means used to perform the operations and the place of application, provided that the technical task is performed on the data.
- (15) *"transfer"* means the making available of data to a specified third party.
16. *"Disclosure"*: making the data available to anyone.
17. *"Erasure"*: rendering data unrecognizable in such a way that it is no longer possible to recover it.
- (18) *'data file'* means the set of data managed in a single register.

### CHAPTER III PRINCIPLES

In accordance with Article 5 of the GDPR Regulation, our accommodation shall process the personal data of the data subject in accordance with the following principles:

**1. Legality, fairness and transparency:** personal data are processed lawfully and fairly and in a transparent manner for the data subject.

**2. Purpose limitation principle:** Personal data are collected only for specified, explicit and legitimate purposes and are not processed in a way incompatible with those purposes; further processing for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes is not considered incompatible with the original purpose.

**3. Data minimisation principle:** Personal data must be adequate, relevant and limited to what is necessary for the purposes for which it is processed, so we do not ask the data subject to provide data that is not necessary for the proper performance or provision of a service.

**4. Accuracy principle:** Personal data must be accurate and, where necessary, kept up to date; we will take all reasonable steps to ensure that personal data that are inaccurate for the purposes for which they are processed are promptly deleted or rectified. If you believe that any of your personal data has been inaccurately provided or inaccurately provided by us, please notify us immediately by sending an e-mail to [hello@lujzaeskoriander.hu](mailto:hello@lujzaeskoriander.hu) so that we can correct it as soon as possible.

**5. Limited storage principle:** Personal data must be stored in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods only if the personal data will be processed for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR Regulation, subject to the implementation of appropriate technical and organisational measures required by the GDPR Regulation to protect the rights and freedoms of data subjects. To this end, we will take into account that the storage of personal data provided by the data subject will only take place for the necessary period of time, which will depend on the time of provision of

the service, legal requirements and the consent of the data subject, and may therefore require different time periods for each of our data processing activities.

**6. Integrity and Confidentiality Principle:** Personal data will be processed in a manner that ensures adequate security of personal data, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage, by using appropriate technical or organisational measures.

**7. Accountability principle:** As a data controller, we are responsible for compliance with points , and we are prepared to demonstrate such compliance where necessary.1 to 6

## **CHAPTER IV**

### **LAWFUL PROCESSING OF PERSONAL DATA OF THE DATA SUBJECT**

#### **1. [Processing based on the data subject's consent]**

(1) On our website, we process the personal data set out in Chapter VI of this Privacy Policy on the basis of the data subject's consent through the completion of the contact form and the room reservation form. In the case of processing based on consent, the data subject's consent to the processing of his/her personal data will be obtained prior to the start of the processing. If the processing serves more than one purpose at the same time, consent must be given for all processing purposes. These purposes are set out in Chapter V of this Privacy Policy. By ticking the box on the form, the data subject gives his or her consent to the processing for the purposes set out in this Privacy Policy. By ticking the box, the data subject will then send his/her data and message to us, provided that he/she has read and understood the contents of this Privacy Policy made available via the link, agrees with the contents and wishes to give his/her consent to the processing. In the event of contact by telephone or in person, in most cases at the same time as the service is used, the data subject will be informed by a member of our staff of the data processing required to provide the information requested or to use the service, and will be informed of the data processing procedure and the rights of the data subject in this Privacy Policy, which will be provided to the data subject at the reception desk upon request and will be made available on the website in an easily accessible manner.

(2) We inform you of our obligation that where the data subject gives his or her consent in a written statement which also relates to other matters, the request for consent must be clearly distinguishable from those other matters, in an intelligible and easily accessible form, in clear and plain language and must not contain unfair terms. Any part of the statement of the data subject's consent that does not comply with the legal requirements shall not be binding.

(3) Please also be informed that, in order for the data subject's consent to be considered informed, the data subject must at least be aware of the identity of the controller and the purposes for which the personal data are processed. Consent shall not be deemed to be given voluntarily if the data subject does not have a real or free choice and is not in a position to refuse or withdraw consent without prejudice. The details of our accommodation as controller are set out in Chapter I of this Privacy Policy and the purposes of the processing are set out in Chapters V, VI and VII of this Privacy Policy.

(4) Processing is lawful if it is necessary in the context of a contract or the intention to conclude a contract. Our accommodation shall not make the conclusion or performance of a contract conditional on the consent to the processing of personal data that are not necessary for the performance of that contract. If we enter into a contract (room reservation, customer, partner contract, etc.) with persons who have expressed an interest through the contact form, we may need to request additional personal data for the preparation of the contract, which will be agreed

upon in separate correspondence. If no contract is finally concluded, the data provided will be deleted from our system. In the event of a successful conclusion of a contract, we will inform our guests, partners and customers about the data processing after the conclusion of the contract in our contract.

(5) **The possibility to withdraw consent** must be made available to the data subject in an understandable, easily accessible, clear and simple manner and must not contain unfair terms. Please note that if **the data subject wishes to withdraw his or her consent, he or she may do so by sending an e-mail to [hello@lujzaeskoriant.hu](mailto:hello@lujzaeskoriant.hu)**. In the event of withdrawal, the data will be deleted without delay and the data subject will be informed by e-mail reply. If we need to continue processing your specific data in order to fulfil a legal or contractual obligation (e.g. to provide a service, issue an invoice, fulfil an accounting obligation), we will inform you by sending you a reply by e-mail.

(6) Please note that where personal data have been collected with the consent of the data subject, we may process the collected data for the purposes of fulfilling a legal obligation to which we are subject, unless otherwise provided by law, without further specific consent and even after the data subject's consent has been withdrawn.

(7) The data subject's consent must be voluntary, i.e. free from any outside influence, and may serve as a legal basis if you have a genuine choice and there is no risk of deception, intimidation, coercion or other significant negative consequences for you if you do not give your consent. In the absence of voluntariness, we would not have an adequate legal basis for processing. Of course, your consent to our processing based on your consent will always be based on your voluntary choice, and your choice will be fully safeguarded.

(8) Due to the nature of our services, it is not typical, but not excluded, that a minor under the age of 16 initiates contact via the website, therefore we consider it important to inform you that one of the special cases of the legal basis for consent to processing is the exception provided for in Article 8 of the GDPR Regulation, according to which the consent of a parent or legal guardian is required for the lawfulness of processing involving minors under the age of 16. In the case of children under the age of 16, the processing of personal data of children is lawful only if and to the extent that consent has been given or authorised by the person having parental authority over the child. We request that, if you become aware that you have not given your consent to the processing of personal data of a child under the age of 16 who is under your parental control, you should inform us immediately so that we can take the necessary steps to delete the data.

## **2.[Information obligation of our accommodation]**

**We make this Privacy Policy easily accessible to data subjects on our website, at our headquarters and at our reception.** The Information Privacy Policy thus informs the data subject in a publicly accessible form, both before and during the processing, in a clear and detailed manner, of all facts relating to the processing of their data, in particular the purpose and legal basis of the processing, the person entitled to process the data and the data processing, the duration of the processing, if the personal data of the data subject are processed by our establishment on the basis of paragraph 6 (5) of the Data Protection Act (consent of the data subject), and who is entitled to access the data. In this context, our information **also covers the rights and remedies of the data subject in relation to data processing, which can be found in Chapters XII, XIII and XIV of this information.**

## **3 [Processing based on the performance of a legal obligation under the law]**

(1) The processing based on the legal ground of compliance with a legal obligation is independent of the consent of the data subject. The data subject shall be informed prior to the

start of the processing that the processing of his or her data is based on a legal obligation, in which context the data subject shall be informed clearly and in detail of all the facts relating to the processing of his or her data, in particular the purposes and legal basis of the processing, the person who is entitled to process and to process the data, the duration of the processing, if the controller processes the personal data of the data subject on the basis of a legal obligation to which the data subject is subject and who is entitled to access the data. Our information also covers the data subject's rights and remedies in relation to the processing. In the case of mandatory processing, the information may also be provided by publishing a reference to the legal provisions containing the information contained in this paragraph.

(2) We inform our Guests that, according to the legislation in force, all accommodation providers in Hungary are required to register all their accommodation facilities with the National Tourist Information Centre (NTAK). Registered accommodation establishments provide anonymous daily statistics on the number of guests staying in their accommodation via accommodation management software. Registration and daily reporting are checked by the local notary.

#### **4 [Processing based on the legitimate interests of the controller]**

The personal data may also be processed if the processing is necessary for the purposes of the legitimate interests pursued by our accommodation, except for third parties, unless the data subject's right to the protection of his or her personal data and privacy prevail over such interests. This may render the processing of the data subject lawful regardless of the data subject's consent, provided that the legitimate interest restricts the data subject's right to the protection of personal data and privacy only to an extent that is necessary and proportionate. Such processing based on a balancing of interests should be carried out in accordance with the principle of gradual processing and, where possible, with the presence of the data subject. As a data controller, the lawfulness of processing based on legitimate interests requires us to carry out a written balancing of interests test and to inform data subjects in an easily accessible way. Our current data processing based on the balancing of interests is the operation of a personal and property security chamber system, for which the balancing of interests test is available for inspection at the reception of our accommodation. Where we carry out further processing based on a balancing of interests, we will supplement this notice with information on that balancing of interests.

## **CHAPTER V DATA PROCESSING IN THE COURSE OF OUR SERVICE PROVISION**

### **1. Contacting our accommodation**

(1) A natural person who initiates contact via our website, by telephone or e-mail or via our social media platform will provide the following data necessary to establish contact:

1. name (surname, first name);
2. your e-mail address;
3. other personal data included in the message, which the data subject may have voluntarily provided.

(2) **The purpose of the processing of personal data is to** provide information about our services, to establish contact between the natural person concerned and our accommodation. To provide the data subject with personalised service and to send him/her a quotation at his/her request. To inform the data subject about the products, services and contractual conditions of the accommodation.

(3) **The legal basis for processing is** the consent of the data subject. On our website, the data subject can give his or her consent to the processing of his or her personal data by ticking the relevant box. When contacting us, this Privacy Policy is available on the website via a link published there. If you contact us by telephone, you can give your consent to the processing of your personal data by communicating with a customer service representative of our accommodation. In the case of e-mail communication, you may provide us with your consent in an e-mail reply or, if you provide us with your data in a letter after presenting the contact details of the privacy notice, your consent will be deemed to have been given. If the data subject wishes to withdraw his or her consent, he or she may do so by sending an e-mail to [hello@lujzaeskoriander.hu](mailto:hello@lujzaeskoriander.hu). If we are no longer obliged to process the data in order to comply with our legal obligations or our contractual processing activities referred to in paragraph 5, we will delete the data without delay and inform the data subject by e-mail.

(4) **The recipient of the personal data** referred to in paragraph (1) is exclusively our Accommodation. When the data subject contacts us, the data transmitted will not be accessed by a data processor or any other third party, the data will not be stored in a storage space, but will be sent directly to the e-mail account which is managed exclusively by our accommodation. In the case of communication by telephone or direct personal request, if data is required, it will be entered into our own closed system.

(5) **Personal data shall be stored for a period of** 3 years from the date of contact, but no later than until the withdrawal of the data subject's consent (request for erasure). If, as a result of the contact, the data subject enters into a contract with our accommodation, the further processing of his/her data shall be governed by our contractual data processing conditions.

## 2. Information about cookies used on this website

### *What is a cookie?*

A cookie is a small text file that is stored on the hard disk of a computer or mobile device for the expiry time set in the cookie and is activated (feedback to the web server) on subsequent visits. Websites use cookies to record information about the visit (pages visited, time spent on pages, browsing data, exits, etc.) and personal preferences, but this is not personally identifiable information. This tool helps to create a user-friendly website to enhance the online experience of visitors.

On other platforms, where cookies are not available or cannot be used, other technologies with similar purposes to cookies may be used.

### *There are two types of cookies: 'session cookies' and 'persistent cookies'*

- Session cookies are stored temporarily by your computer, notebook or mobile device until you leave the website; these cookies help the system to remember information so that you do not have to re-enter or fill in that information. Session cookies are limited to the duration of the user's current session and are intended to prevent data loss (for example, when filling in a long form). At the end of the session or when the browser is closed, this type of cookie is automatically deleted from the visitor's computer.
- Persistent cookies are stored on your computer, notebook or mobile device even after you leave the website. These cookies allow the website to recognise you as a returning visitor. Persistent cookies can be used to identify you through a server-side identifier - user association, so they are a necessary condition for correct operation in all cases where user authentication is essential, e.g. webshop, netbank,



webmail. Persistent cookies do not carry any personal data on their own and can only be used to identify the user in combination with the association stored in the server's database. The risk of such cookies is that they do not actually identify the user but the browser, i.e. if someone enters a webshop in a public place, e.g. an internet café or a library, and does not exit when leaving, another person using the same computer could later gain unauthorised access to the webshop on behalf of the original user.

#### *How can I enable or disable cookies?*

Most internet browsers automatically accept cookies, but visitors have the option to delete or reject them. As each browser is different, you can set your cookie preferences individually using the browser toolbar. If you do not wish to allow any cookies from our website, you can change your web browser settings to receive notifications of cookies sent, or simply reject all cookies. You can also delete cookies stored on your computer or mobile device at any time. For more information on settings, see your browser's Help. Please note that if you choose to disable cookies, you will have to opt out of certain website features.

#### *What cookies do we use*

##### **Tools essential for the website to work:**

Such cookies are essential for the proper functioning of the website, so in this case the legal basis for data processing is Article 13/A (3) of Act CVIII of 2001 *on certain issues of electronic commerce services and information society services*. No data transfer will take place.

##### a) Completion guide

The purpose of the data management: to help you fill in the forms by offering you in advance the form you think is appropriate.

Data processing period: for the duration of your stay on the website

##### b) Helps you to find

Purpose of processing: to help you find what you are looking for as quickly as possible

Data processing period: lasts for the duration of your stay on the website

##### c) Spell check

Purpose of data processing: automatically corrects alleged mismatches

Data processing period: lasts for the duration of your stay on the website

##### d) Identify language setting:

Purpose of the processing: the website uses a standard cookie to identify you as an individual user when you visit the website in order to remember your language preferences.

Data retention period: this setting (cookie) is stored for 29 days.

##### e) Social network cookie (Facebook, Instagram, Google+, Youtube)

Purpose of the processing: this cookie allows the content of the website to be shared.

Data retention period: this cookie is stored until the time of sharing.

##### f) Multimedia player

Purpose of processing: this cookie allows you to play videos on the website.

Data retention period: this cookie is stored until the time of sharing.

##### **Cookies that collect statistical data**

These cookies only collect statistical data and do not process personal data. They are used to monitor how you use the website, what topics you view, what you click on, how you scroll through the website, which pages you visit. However, the information is collected anonymously. For example, we may find out how many visitors you have to the site each month. These statistics also help us to tailor our site to the needs of our users. Google Tag Manager (and Google Analytics) and Hotjar help us collect this data.

### **Cookies for marketing/advertising purposes**

The purpose of such cookies is to send personalised advertising.

Legal basis for processing: in all cases, your consent, which you give in the pop-up window on the website. You can withdraw your consent at any time, but such withdrawal will not affect the lawful processing that preceded it. In the event of withdrawal, no advertising tailored to your needs will be displayed on other interfaces. This cookie is stored for 90-180 days.

#### **-Google Ads**

Further information about the cookies used by Google Ads is available on the following page:  
<https://policies.google.com/technologies/ads?hl=hu>

#### **-Meta Ads**

More information about the cookies used by the Meta Ads service is available on the following page:

[https://www.facebook.com/privacy/policy/?entry\\_point=data\\_policy\\_redirect&entry=0](https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0)

#### **TikTok Ads**

More information about the cookies used by the TikTok Ads service is available on the following page:

<https://ads.tiktok.com/i18n/official/policy/terms>

If you wish to exercise any of your rights in relation to the above, or if you wish to contact us for any other reason in relation to the above processing, please let us know by sending an e-mail to [hello@lujzaeskoriander.hu](mailto:hello@lujzaeskoriander.hu).

### **3. Data management on the Lujza & Koriander social media platforms**

(1) Please note that we operate a Facebook page called "Lujza & Koriander", an Instagram page called "Lujza & Koriander - @lujzaeskoriander" and a TikTok page called "lujzaeskoriander" (hereinafter collectively referred to as "social networking page").

(2) A complaint about data management made to a community site operated by us on its website does not constitute a formal complaint.

(3) We do not process personal data posted by visitors to the Community Site.

(4) Visitors are governed by the Privacy Policy and Terms of Service of the Community Site.

(5) In the event of publication of unlawful or offensive content on social networking sites, we, as the data controller, as the operator of the social networking site, may exclude the data subject from the site without prior notice and delete his or her comments.

(6) We are not responsible for any unlawful content or comments posted by users of the Community Site on our Community Site. We are not responsible for any personal data protection errors, malfunctions or problems arising from the operation of the Community Site or from changes to the operation of the system.

(7) The provisions of this section shall apply mutatis mutandis to any additional social networking sites that may be created in the future.

#### **4. Data processing related to the newsletter service**

(1) The natural person registering for the newsletter service may give his/her consent to the processing of his/her personal data by ticking the relevant box. The box will not be ticked in advance. When subscribing, this privacy policy will be made available via a link. The data subject may unsubscribe from the newsletter at any time by using the "Unsubscribe" button in the newsletter sent by e-mail or by sending a declaration by e-mail, which will constitute a withdrawal of consent. The name of our newsletter service partner will be indicated in the list of data processing partners in this privacy statement. Please note that you can also subscribe to our newsletter by registering with the Querko and Yalty apps, in which case your consent will be requested by the app, and your data will be processed, stored, the purpose, the legal basis and the possibility to unsubscribe/unsubscribe will be in accordance with the apps' privacy policy. In this case, the application will transmit to us the data required for sending the newsletter, which are the same as those set out below.

**The scope of personal data processed** is the natural person:

1. name (surname, first name);
2. your e-mail address.

**Purpose of processing personal data:** sending newsletters about the products and services of the accommodation; sending advertising material.

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

**Recipients and categories of recipients of personal data** Employees of our accommodation who perform tasks related to customer service and marketing activities, our partner providing newsletter services as a data processor.

**The storage period of personal data** lasts until the newsletter service is discontinued or until the data subject's consent is withdrawn (request for deletion).

### **CHAPTER VI**

#### **SPECIFIC PROVISIONS ON THE PROCESSING OF DATA OF THE GUESTS OF THE ACCOMMODATION**

##### **1. [Reservations through our website, e-mail address and reception]**

(1) For the purpose of the performance of the contract, our accommodation shall process the data of the natural person who has contracted with it as a guest, by filling in the data request form sent by e-mail or provided at the reception of the accommodation, for the purpose of the conclusion and performance of the contract necessary for the provision of the accommodation service.

1. surname and first name,
2. place and date of birth,
3. your passport number or identity card number,
4. citizenship,
5. address,

6. your e-mail address,
7. your phone number,
8. the names of the natural persons using the accommodation service with the guest as additional guests,
9. if applicable, the type of accommodation service (leisure, business, event, other),
10. the signature of the guest.

(2) Such processing shall also be lawful where it is necessary for the purposes of taking steps at the request of the data subject prior to the conclusion of the contract. The recipients of the personal data are the accommodation, its employees and its processors. The period of storage of personal data shall be the period specified in the applicable legislation, failing which, or, as appropriate, 5 years after the termination of the contract, after which they shall be deleted.

(3) Our accommodation facility shall process the encrypted payment data of the natural person contracted with it as a guest for the purpose of concluding and performing the contract necessary for the provision of the accommodation service. Such processing shall also be lawful if it is necessary for the purposes of taking steps at the request of the data subject prior to the conclusion of the contract.

Data processed: encrypted with a code, so the data is not accessible by the Hotel, only by the data processing partner operating the credit card payment: payment method, cardholder name (name on the card), card number, expiry date.

Legal basis for processing: consent of the data subject, performance of a legal obligation and performance of a contract. The information may also be provided in the contract. The provision of the data is a condition of the provision of the service contractually agreed.

Recipients of the data: the recipients of the personal data are the Hotel, its employees and its data processors (accommodation management software, billing software, accountant, data reporting obligations under the Turtv.) If the data subject pays for the accommodation service by credit card, the recipient of the payment data is the data processor contracted by the accommodation provider to process the payment services. The accommodation does not have access to the payment data, but only to a code that is linked to the payment through the data processor, but cannot be traced back to the natural person. The data processor providing the payment service has the necessary security and IT measures and systems in place to ensure the secure handling of the payment data. If necessary in the event of a temporary malfunction or other failure of the payment service system, the payment data shall be encrypted by the accommodation.

Duration of data storage: bank card data are encrypted and can only be disclosed for the purpose of the transaction and only to the authorised person. Once the service has been completed, the data can no longer be disclosed and access is not possible. The data will be deleted after 8 years.

(4) The data subject shall inform the natural person concerned, before the processing starts, in this privacy notice uploaded on the website of the accommodation, that the processing is based on the performance of a contract, on the consent of the data subject and on the fulfilment of a legal obligation. The information may also be provided in the contract. The data subject shall also be informed of the transfer of his/her personal data to a data processor.

## **2. [Book a room by phone, email or through our community page]**

The provisions of this section shall be governed mutatis mutandis by point 1 of this Chapter.

## **3. [Booking with a third party agency]**

(1) Our accommodation establishment may use the services of a third party or agency for the purpose of concluding, performing or terminating a contract necessary for the provision of accommodation services or for the purpose of granting a contractual discount.

(2) In the course of the service provided for in paragraph (1), the personal data of the natural person concerned shall be provided to the third party agency as data controller and the third party agency shall transmit the data of the natural person concerned to the accommodation provider for the purposes of the reservation. If the accommodation service is used by the person concerned, the accommodation shall receive the data received, process them and keep them as data controller in accordance with points 1 and 2 of this Chapter.

#### **4.[Information on the obligation to provide data under the Turtv.]**

Accommodation providers are obliged to provide data on the registration of accommodation service users under Act CLVI of 2016 on State Tasks for the Development of Tourist Areas (hereinafter: Turtv.)<sup>7</sup> and Government Decree 235/2019 (X. 15.) on the implementation of the Turtv.

Pursuant to Section 9/H (1) (b) of the Turtv., in order to protect the rights, safety and property of the person concerned and others, and to monitor compliance with the provisions on the stay of third-country nationals and persons enjoying the right of free movement and residence, the accommodation provider shall, upon check-in, record, via the accommodation management software, the identification data of the accommodation user's identity document or travel document, among others, on the storage space provided by the hosting provider designated by Government Decree - i.e. the VIZA system.

In other words, the purpose of data processing is defined in Section 9/H (1) of the Turtv.tv: to protect the rights, safety and property of the data subject and others, and to monitor compliance with the provisions on the residence of third-country nationals and persons enjoying the right of free movement and residence.

Paragraph 9/H (1) of the Turtv. provides, in addition to the purpose of the processing, the legal basis for the processing, as the processing is necessary for the fulfilment of a legal obligation imposed on the controller by law.

The data management is specified in Article 14/C (1)-(2) of the Act, according to which the accommodation provider shall transmit the data pursuant to Article 9/H (1) of the Act to the hosting system, i.e. the VIZA system, in an electronic form and encrypted per accommodation unit, using the accommodation management software. The accommodation service provider shall record the data pursuant to Section 9/H (1) (a) and (b) of the Act in the accommodation management software via the document reader. Data that cannot be recorded via the document reader shall be recorded by the accommodation provider in the accommodation management software by means of manual data entry.

The accommodation provider must record the personal data of guests in the accommodation management software at check-in and store it until the last day of the first year after it becomes known to the accommodation provider. This personal data is transferred from the accommodation management software to the VIZA system in encrypted form. The purpose of the registration of guests is to ensure that, in the event that the accommodation provider becomes involved in a civil dispute with the guest or wishes to claim compensation from the guest, the exact details of the guest using the accommodation service are available. For the legal interest, the use is only possible for the period of storage required by the accommodation provider, after which the personal data will also be deleted from the VIZA system.

The scanning and transmission of guests' identifiable documents to VIZA by the accommodation provider is therefore necessary to comply with the legal obligation under Article 6(1)(c) of the GDPR, as defined by the Turtv.

According to the legislation in force, if the guest does not present an identity document or travel document, the accommodation provider will refuse to provide the accommodation. If the guest fails to present his/her documents to the accommodation provider, the accommodation provider is obliged to refuse to provide the accommodation and has no discretion.

In connection with the above, a brief reference should be made to the statistical data reporting to the National Tourism Data Service Centre (hereinafter referred to as NTAK) operated by the Hungarian Tourism Agency (hereinafter referred to as MTÜ). The provision of data to the NTAK is also done through the accommodation management software, and statistical data not containing personal data recorded in the software are automatically transferred to the NTAK. Only aggregated statistics are therefore included in the NTAK. The NTAK does not have access to the data of the guests (they are automatically encoded by the system), but the accommodation provider can access the data if necessary.

## **5. [Data management at events organised by our accommodation]**

(1) Our Establishment shall, subject to the consent of the data subject, process the following data of the natural person concerned participating in the event during the events provided on the premises of the Establishment, provided that it complies with the legal conditions, judicial practice and information contained in this Section:

1. name,
2. e-mail address,
3. recording of images, sound and moving images.

(2) The consent of the natural person concerned must be obtained before the processing starts. In any event, at the request of the data subject, the images, sounds and video images of the data subject shall be erased.

(3) The Accommodation shall carry out the processing of data pursuant to paragraph (1)(1) of this section taking into account the following:

a) Pursuant to the provisions of the Infotv., a person's face or likeness is personal data, and the taking of a picture or any operation performed on the data constitutes processing for which the the person concerned consent of is required. The consent must be voluntary, explicit and based on appropriate information, by which the data subject gives his or her unambiguous consent to the processing of all or some of the personal data relating to him or her.

(b) In the case of minors, the consent of the legal representative of a minor aged 16 or over is not required for the validity of the declaration of consent of the minor concerned. After the age of 16, the minor may independently declare the use of his or her personal data, and the consent or subsequent approval of his or her legal representative is not required for the declaration of consent.

c) Consent may be given by implied conduct. Consent must be voluntary, firm and based on proper information, otherwise it will not be considered admissible. After having been informed, access to the venue of the event and participation therein shall be considered as an implied act of the Hotel. The person concerned shall be deemed to have engaged in such conduct if he/she knows that a recording is being or may be made in the room where he/she enters. However, the consent to the taking of a photograph, audio or video recording does not imply the authorisation

of its use, as the right to dispose of the use is independent and separate from the authorisation to take the recording.

(d) Consent to the making of images, sound and moving images, even if obtained by means of implied conduct, does not constitute an authorisation to make the recordings available to the public. Thus, with the exception of crowd-sourced recordings, the publication of images, sound recordings and moving images requires the voluntary consent of the persons concerned. In the event of proceedings against the controller for possible unlawful processing, such as processing in the absence of consent, it is for the controller to prove the lawfulness of the processing, since, in accordance with the legal provisions in force, it must be presumed, in case of doubt, that the data subject has not given his or her consent. Therefore, from a data controller's point of view, for the uses referred to in this point (d), except for mass recordings, it is recommended in principle that consent is given in writing.

(e) In accordance with the provisions of the Civil Code, the consent of the data subject is not required for the making of the recording and the use of the recording made in the case of public recordings and recordings of public appearances. In the case of the photographs taken, it is necessary to examine on a case-by-case basis whether the photograph constitutes a publicity photograph, otherwise the publication of the photographs is only lawful with the consent of the persons concerned or, in the case of minors under the age of 16, of the parents.

f) The accommodation shall inform the data subjects about the processing of data at events in its Privacy and Data Protection Privacy Policy published on its website and available at the reception. In addition, the accommodation shall, if necessary, provide information on data processing subject to consent on a separate notice (on the registration form or on the back of the ticket for the event) upon entry to the event. The accommodation shall inform the data subject of the identity of the controller, the purpose of the processing, the location where the recordings can be accessed, the means by which the data subject may request that the recording not be disclosed, the possibility to erase the recording and where the detailed and comprehensive information on the processing of personal data can be obtained.

## **6. [Table reservation]**

Our accommodation will treat guests who book a table and an appointment for the services of the café and restaurant in accordance with the terms and conditions set out in section 1 and in this information:

- a) your first and last name;
- b) your telephone number;
- c) your e-mail address.

## **7. [Data processing concerning food sensitivities and food allergies]**

For the health safety of both our regular guests and guests attending events and other events, our accommodation processes the personal data of the data subject relating to food sensitivities and food allergies, which are considered as special health data within the meaning of Article 6 of the Regulation. Data processed by the accommodation: type of food sensitivity or food allergy. The accommodation shall process the data until the day after the event or for as long as the guest has a contractual relationship with the accommodation (as long as the reservation is valid). After that, the data will be deleted.

# **CHAPTER VII**

## **CONTRACT-RELATED DATA PROCESSING**

### **1. Processing the data of our contracting partners and customers**

(1) For the purpose of the conclusion, performance, termination, granting of contractual benefits, business relations, we process the personal data of natural have contracted with us for the purpose of the performance of the contract.

- a) your first and last name,
- b) your address/place of business/premises,
- c) your tax identification number/tax identification number,
- (d) the registration number,
- e) your telephone number,
- f) your e-mail address,
- g) where applicable, your bank account number.

Such processing is also lawful if it is necessary for the purposes of taking steps at the request of the data subject prior to the conclusion of the contract.

(2) Recipients of personal data As the Data Controller, we may transfer the personal data we receive to our accommodation and employees, and to our data processing partners performing billing services and accounting activities, as registered in the register of data processing activities.

(3) The period of storage of personal data, with the exception of data processed for the fulfilment of tax and accounting obligations, shall be the period specified in the applicable legislation, failing which, or, as the case may be, 5 years after the termination of the contract or business relationship, after which they shall be deleted.

(4) Our employee shall inform the natural person concerned before the processing starts that the processing is based on the performance of a contract or a legal obligation or, where applicable, request the consent of the data subject. The information may be provided in the contract or, in the case of contracts concluded by the accommodation by electronic means, by means of the information notice accompanying the electronic contract. The data subject shall also be informed of the transfer of his or her personal data to a data processor.

## **2. Contact details of the natural person representatives of our legal entity clients, contracting partners**

(1) We may process your personal data for the performance of a contract with our legal entity partner, for the purpose of business relations, with the consent of the natural person representative concerned. The scope of the personal data that may be processed includes the natural person

- a) first and last name,
- b) your address,
- c) your telephone number,
- d) your e-mail address.

(2) The recipient of the personal data The Data Controller and our employees and, in order to carry out billing services and accounting activities, we may transfer the data received to our data processing partners carrying out these activities, as registered in the register of data processing activities.

(3) The period of storage of personal data, with the exception of data processed for the fulfilment of tax and accounting obligations, shall be the period specified in the applicable legislation, failing which, or for 5 years after the termination of the contract or business relationship or the termination of the capacity of representative of the data subject, after which they shall be deleted.



(4) Our employee shall inform the natural person concerned before the processing starts that the processing is based on the performance of a contract or a legal obligation or, where applicable, request the consent of the data subject. The information may be provided in the contract or, in the case of contracts concluded by the accommodation by electronic means, by means of the information notice accompanying the electronic contract. The data subject shall also be informed of the transfer of his or her personal data to a data processor.

### **3. Data processing based on legal obligations**

#### **Data processing for tax and accounting obligations**

(1) For the purpose of fulfilling our legal obligations, tax and accounting obligations (invoicing, accounting, taxation), we process the data of natural persons who have business relations with us, as defined by law. The data processed are in particular the data specified in Act CXXVII of 2017 on Value Added Tax, Act C of 2000 on Accounting and Act CXVII of 1995 on Personal Income Tax.

(2) The period of storage of personal data shall be the period specified in the legislation in force at the time, failing which, or, as the case may be, 8 years after the termination of the legal relationship giving rise to the legal basis.

(3) The recipients of the personal data are our third-party accountancy and invoicing data processing partners performing tax, accounting, payroll and social security functions. The accounting firm listed in the register of data processing activities in Annex 9 to these Rules performs data processing activities on behalf of our accommodation as data controller. For the issuing of invoices, we use the services of our data-processing partner, the invoicing service provider as published in the register of processing activities.

(4) Our data management activities based on legal obligations include our data management activities and data reporting obligations based on the Turtv. and its implementing regulation, which we have informed you about in Chapter VI.4. above.

## **CHAPTER VIII**

### **USE OF SECURITY, PERSONAL AND PROPERTY PROTECTION CAMERAS**

#### **1.[Processing of personal data for the purpose of personal security and property surveillance]**

(1) In the premises of our accommodation, including the rooms open for the reception of our guests - not including the accommodation rooms, changing rooms, showers, toilets, etc. - we use an electronic surveillance system for the protection of human life, physical integrity, personal freedom, trade secrets and the protection of property, which allows the recording of images, and therefore the behaviour of the data subject recorded by the camera is considered personal data.

(2) The legal basis for processing is the legitimate interests. The purpose of video surveillance and data processing: In addition to live camera surveillance, the purpose of data processing is to reconstruct the activities of natural persons within the cameras' field of view, to prove the rights and obligations set out in the contract, to cooperate in evidence-gathering procedures during official proceedings, and to ensure the protection of natural persons and property protection in relation to the data controller's assets.

(3) We shall place information (hereinafter collectively referred to as "information" for the purposes of this clause) on the fact that an electronic surveillance system is being used in a given area in a clearly visible and legible place, in a manner that will help to inform third parties wishing to enter the area. The information will be provided for each camera. This information shall also include information on the fact of surveillance by the electronic asset protection system and the purpose of the recording and storage of the images containing personal data recorded by the system, the legal basis for the processing, the place where the recording is stored, the duration of the storage, the identity of the person using (operator) the system, the persons who are entitled to access the data and the provisions on the rights of the data subjects and the procedures for exercising them.

(4) Images of third persons (e.g. customers, guests) entering the monitored area may be taken and processed with their consent. Consent may also be given by means of an impulse, in particular if the natural person entering the monitored area enters the area despite an information sign or notice on the use of the electronic surveillance system placed at the entrance to the area.

(5) Recordings may be retained for a maximum of 12 calendar days if not used, after which they will be deleted. Use shall be deemed to have been made if the recorded images or other personal data are intended to be used as evidence in judicial or other official proceedings.

(6) Any person whose right or legitimate interest is affected by the recording of the data of the image recording may, within 3 (three) working days of the recording of the image recording, request that the data not be destroyed or deleted by the data controller by providing evidence of his or her right or legitimate interest.

(7) Camera surveillance systems shall not be used in premises where such surveillance could offend human dignity, in particular in accommodation rooms, changing rooms, showers and toilets. The camera position must not be specifically directed at the purpose of observing the person concerned. The fact that the overall field of view of the camera includes the area in which the data subject is carrying out his or her activities does not constitute explicit observation of the data subject, if the data subject is included in it to a proportionate and justified extent [e.g. a camera monitoring the reception/kitchen and its surroundings, where the recording is not explicitly, exclusively and clearly intended to monitor the person in the reception/kitchen/anterior, but includes, together with the area monitored for security purposes (e.g. the reception area), a proportionate and justified presence of the person and therefore possibly his/her activity].

(8) If no one is lawfully present on the premises of our Accommodation, in particular outside business hours, the entire area of our Accommodation may be monitored.

(9) In addition to those authorised by law, the staff operating the surveillance system, the manager and deputy manager of our accommodation and the workplace manager of the monitored area are entitled to view the data recorded by the camera surveillance system for the purpose of detecting violations and monitoring the operation of the system.

## **CHAPTER IX**

### **INFORMATION ON THE RIGHTS AND OBLIGATIONS BETWEEN THE CONTROLLER AND THE PROCESSOR**

(1) Processors included in the register of processing activities shall implement technical and organisational measures to ensure compliance with the requirements of the GDPR Regulation, including security of processing, in particular in terms of expertise, reliability and resources.

(2) The data processors shall be bound by the obligation of confidentiality with regard to the data disclosed to them by the accommodation provider.

(3) In the course of its activities, the processor shall ensure that persons authorised to have access to the personal data concerned are bound by an obligation of confidentiality in relation to the personal data they have access to, unless they are otherwise subject to an appropriate obligation of confidentiality based on law.

(4) The data processor shall have appropriate hardware and software facilities and shall ensure the implementation of technical and organisational measures suitable to ensure the lawfulness of data processing and the protection of the rights of data subjects.

(5) As the data controller, our accommodation shall conclude a written contract with the data processor for the data processing activity, which contract shall contain the data processing rights and obligations.

(6) As the data controller, our accommodation shall have the right to monitor the processor's performance of the contract pursuant to paragraph (5).

## **CHAPTER X**

### **DATA SECURITY MEASURES**

#### **1. [Data security measures]**

(1) For all purposes and in relation to our lawful processing, we are obliged to take the technical and organisational measures and to establish the procedural rules necessary to ensure the security of personal data.

(2) We take appropriate measures to protect the data against accidental or unlawful destruction, loss, alteration, damage, unauthorised disclosure or access.

(3) We classify and treat personal data as confidential.

(4) With regard to the data received through our website, electronic data processing and record-keeping is carried out by means of a computerised IT system that meets the requirements of data security.

(5) If, for necessary reasons, we process the data of the natural persons concerned in the context of our data management activities on a suitable paper document, we will process and store them in a locked file at our headquarters, in accordance with the provisions of our Privacy Policy and this Privacy Policy (legal basis, scope of data processed, retention period).

(6) We ensure that incoming and outgoing communications by electronic means are monitored to protect personal data.

(7) Documents containing personal data in the course of ongoing work or processing may only be accessed by our Accommodation and will be kept securely locked.

(8) We ensure adequate physical protection of the data and the media and documents carrying them.

## **CHAPTER XI**

### **HANDLING DATA BREACHES**

#### **1. [The concept of a data breach]**

(1) A personal data breach is a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed (GDPR Regulation Article 4.12.)

(2) The most common reported incidents include, but are not limited to: loss of laptop or mobile phone, unsecure storage of personal data; unsecure transmission of data, unauthorized copying or transmission of customer or partner lists, server attacks, website hacking.

#### **2.[Data breach handling, remediation]**

(1) As a service provider, it is our responsibility to prevent and manage data breaches and to comply with the relevant legal requirements.

(2) If our data processing partner providing IT services becomes aware of a data breach in the course of its duties, it will notify us immediately. Access and attempted access to IT systems must be logged and analysed on an ongoing basis.

(3) Data breaches can be reported to our central email address ([hello@lujzaeskoriander.hu](mailto:hello@lujzaeskoriander.hu)), where visitors, customers, contractors or other stakeholders can report the underlying events, security weaknesses.

(4) In the event of a data breach notification, we will promptly investigate the notification, identify the incident and determine whether it is a genuine incident or a false positive. We will investigate and determine:

- a) the time and place of the incident,
- b) a description of the incident, its circumstances and its effects,
- c) the scope and quantity of data compromised during the incident,
- d) the persons affected by the compromised data,
- e) a description of the measures taken to remedy the incident,
- f) a description of the measures taken to prevent, remedy or reduce the damage.

(5) In the event of a data breach, we will contain and isolate the systems, people and data involved and ensure the collection and preservation of evidence that supports the occurrence of the breach. We will then begin to repair the damage and restore lawful operations.

#### **3.[Data breach records]**

(1) We keep records of data breaches, which include:

- a) the scope of the personal data concerned,
- b) the scope and number of data subjects affected by the data breach,
- c) the date of the data breach,
- d) the circumstances and effects of the personal data breach,
- e) the measures taken to remedy the personal data breach,
- f) other data specified in the legislation requiring the processing.

(2) Data relating to data protection incidents in the register will be kept for 5 years.

#### **4. [Notification of data breaches to the authority]**

We will report those data breaches to the competent supervisory authority, the National Authority for Data Protection and Freedom of Information (hereinafter: NAIH), pursuant to Article 33(1) of the GDPR. The GDPR Regulation imposes a requirement on the controller to

notify a data breach to the NAIH without undue delay and, if possible, no later than 72 hours after the data breach has come to its attention. The notification can be made electronically through the NAIH's Incident Reporting System or on paper (<https://www.naih.hu/adatvedelmi-incidensbejelento-rendszer>)

## **CHAPTER XII**

### **RIGHTS OF THE DATA SUBJECT, REMEDIES**

Below you will find information about your rights and remedies available to you and other natural persons concerned with regard to the protection of your personal data. **The submission and processing of data subjects' requests are governed by Chapter XIV.**

#### **1 [Right to prior information and right of access]**

The data subject shall have the right to be informed of the facts and information relating to the processing before the processing starts. You can request information by sending an e-mail to [hello@lujzaeskoriander.hu](mailto:hello@lujzaeskoriander.hu). If you request it, we will provide you with the requested information without undue delay and within one month at the latest, on whether or not your personal data are being processed and, if so, whether you have the right to know what personal data we are processing, on what legal basis, for what purposes and for how long; to whom, when, on the basis of what law and to which personal data we are granting access, to whom we are transferring your personal data; from what source we are accessing your data; whether or not we are using automated decision-making and, if so, the logic behind it and, in the case of profiling, whether or not we are informing you about it.

You may request a copy of your personal data, which will be provided to you free of charge on the first occasion, after which we may charge you a reasonable fee based on administrative costs. Please note that, in order to meet data security requirements, we are entitled to verify your identity when requesting data and making copies.

#### **2. [Right to rectification]**

The data subject shall have the right to obtain, at his or her request and without undue delay, the rectification by the controller of inaccurate personal data relating to him or her. Having regard to the purposes of the processing, the data subject shall have the right to obtain the rectification of incomplete personal data, including by means of a supplementary declaration. If the data subject provides credible evidence of the accuracy of the corrected data, his or her request will be complied with within a maximum of one month and the data subject will be informed of this on the contact details provided.

#### **3. [Right to erasure ("right to be forgotten")]**

The data subject has the right to obtain, at his or her request and without undue delay, the erasure of personal data relating to him or her by the controller through our contact details provided in point 1, and the controller is obliged to erase personal data relating to the data subject without undue delay if one of the grounds set out in the Regulation applies (Article 17 GDPR Regulation). Where the data processed is necessary for the exercise of legal claims or for accounting purposes, for example to a public authority, the processing may be based on the fulfilment of a legal obligation or on legitimate interest. In the course of erasure, the controller must also notify the data processors involved of the erasure obligation.

The controller shall delete personal data concerning the data subject without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) the storage period set by the controller has expired;

- c) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- d) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- e) the personal data have been unlawfully processed;
- f) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- g) personal data are collected in connection with the provision of information society services.

#### **4. [Right to restriction of processing]**

The data subject has the right to request the restriction of processing via our contact details provided in point 1 if the following conditions set out in the GDPR Regulation are met:

- a) contest the accuracy of your personal data (limited to the time of our verification);
- b) the data processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- c) the controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to the processing (limited to the period until the priority of the controller's legitimate grounds is established).

#### **5.[Obligation to notify the rectification or erasure of personal data or restriction of processing]**

We will inform all recipients of any rectification, erasure or restriction of processing to whom or with which we have disclosed the personal data, unless this proves impossible or involves a disproportionate effort. The data subject will be informed of these recipients upon request (Article 19 GDPR Regulation).

#### **6. [Right to data portability]**

Subject to the conditions set out in the GDPR Regulation, the data subject has the right to receive personal data relating to him or her that we have received in a structured, commonly used, machine-readable format and the right to transmit such data to another controller without our hindrance (Article 20 GDPR Regulation).

#### **7. [Right to object]**

The data subject has the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation on the basis of Article 6(1)(e) of the GDPR Regulation (processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller) or (f) (processing necessary for the purposes of the legitimate interests pursued by the controller or by a third party). (Article 21 GDPR Regulation) In the event of an objection, the controller may no longer process the personal data, except on legitimate grounds which override the interests of the data subject or are necessary for the establishment, exercise or defence of legal claims.

#### **8.[Automated decision-making in individual cases, including profiling]**

We do not use or perform profiling, automated decision making or automated mechanisms. We do not allow our processors to carry out automated decision-making or profiling, unless the data subject has given his or her explicit consent in writing. In addition, we inform you that each data subject has 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 (Article 22 GDPR).

#### **9. [Restrictions]**

The EU or Member State law applicable to us as a controller or to our processing partner may, by legislative measures, in the cases set out in the GDPR Regulation, limit the scope of the rights and obligations to process personal data (Article 5 of the GDPR Regulation) in respect of its provisions in accordance with certain rights and obligations set out in the GDPR Regulation (Article 23 of the GDPR Regulation). In the case of a limitation, personal data may be stored only for storage purposes, and other processing may only be carried out with the consent of the data subject, for the purpose of a legal claim or in the public interest.

#### **10. [Informing the data subject about the personal data breach]**

If the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, we will inform the data subject of the personal data breach without undue delay (Article 34 GDPR Regulation).

### **CHAPTER XIII**

#### **RIGHT OF THE DATA SUBJECT TO A REMEDY**

##### **1. [Right to lodge a complaint with a supervisory authority (right to official redress)]**

The data subject has the right to lodge a complaint with the supervisory authority if he or she considers that the processing of personal data concerning him or her infringes the GDPR Regulation (Article 77 GDPR Regulation).

##### **2. [Right to an effective judicial remedy against the supervisory authority]**

Every natural and legal person has the right to an effective judicial remedy against a legally binding decision of a supervisory authority relating to him or her, or if the supervisory authority does not deal with the complaint or does not inform the data subject within three months of the procedural developments concerning the complaint lodged or of the outcome of the complaint (Article 78 GDPR Regulation).

##### **3 [Right to an effective judicial remedy against the controller or processor]**

Every data subject has an effective judicial remedy if he or she considers that his or her rights under the GDPR Regulation have been infringed as a result of the processing of his or her personal data in a way that does not comply with the GDPR Regulation (Article 79 of the GDPR Regulation). If you consider that your personal data have been processed in a way that infringes the applicable data protection requirements, you can lodge a complaint with the supervisory authority - see Chapter XI, point 2 for contact details - and you can also take your data to court, which will rule on the matter out of turn. In this case, you are free to choose whether to bring your action before the competent court in the place where you reside (permanent address) or stay (temporary address) or where the controller is established. You can find the court of your place of residence or domicile at <https://birosag.hu/birosag-kereso>. The Metropolitan Court of Budapest has jurisdiction over the lawsuit according to the seat of the data controller.

### **CHAPTER XIV**

#### **SUBMISSION OF THE DATA SUBJECT'S REQUEST, ACTIONS BY THE CONTROLLER**

##### **1. [Measures taken at the request of the data subject]**

(1) In the cases covered by this Privacy Policy, the data subject may submit his or her request in the first instance by sending an electronic mail to the e-mail address [hello@lujzaeskoriander.hu](mailto:hello@lujzaeskoriander.hu). The data subject will be informed without undue delay, and at the latest within one month of receipt of the request, of the action taken in response to his or her request to exercise his or her rights. If, for any excusable reason, we have not been informed of the receipt of the request, we

are obliged to act without delay after having been informed, without delay, of the data subject's request.

(2) If necessary, taking into account the complexity of the application and the number of applications, this time limit may be extended by a further two months. The extension will be notified to the person concerned within one month of receipt of the request, stating the reasons for the delay.

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

(4) If we do not take action on the data subject's request, we shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the possibility to lodge a complaint with a supervisory authority and to exercise his or her right of judicial remedy.

(5) We will provide the information pursuant to Articles 13 and 14 of the GDPR Regulation and the information on the rights of the data subject (Articles 15 to 22 and 34 of the Regulation) and take action free of charge. If the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, we may charge administrative costs incurred in providing the information or information requested or in taking the requested action, or refuse to act on the request. The burden of proving that the request is manifestly unfounded or excessive lies with us as the controller.

(6) Where we, as data controller, have reasonable doubts as to the identity of the natural person making the request, we may request additional information necessary to confirm the identity of the data subject.

## **2. Contact details of the supervisory authority:**

National Authority for Data Protection and Freedom of Information

Address: 1055 Budapest, Falk Miksa utca 9-11.

Website: <http://naih.hu>

Postal address: 1363 Budapest, Pf.: 9.

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Phone number: +36 (1) 391-1400



## **Register of our data processing partners carrying out data processing activities Lujza and Coriander**

### **I. Our IT, security and financial data partners**

The Service Provider uses a hosting service provider for the operation of its IT services, who processes the personal data of the data subject in accordance with this clause.

**Name of the data processor:**

Company name: Webonic Kft.

Headquarters: 8000 Székesfehérvár, Budai út 9-11.

E-mail: support@webonic.hu

**The purpose of data processing:** proper operation and maintenance of the website, providing the customer with the possibility to contact us.

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

**Duration of data processing:** until the termination of the contract between the data controller and the data processor or until the withdrawal of the data subject's consent, with the understanding that the personal data provided in the contact form may be accessed by the hosting provider, but the data are not stored on the server, they are directly received by the Service Provider's closed mail system.

**Scope of data processed:** data provided during contact and booking.

### **II. The data processing partner facilitating online booking**

#### **I. Our external contractors for booking and sales**

For the processing of the data of the guest concerned in the course of reservations and sales, our accommodation uses external contractors who provide the related IT and other services on their own systems, through their own network, and in this context, under the scope of their own data management policy, process the personal data transmitted to them and, if necessary for the performance of the operation carried out by them, store the personal data transmitted on their servers. For more detailed information on data processing and the duration of data storage, please contact our partners at the following contact details. The names and contact details of these partners are given below:

We inform our guests that their data transmitted to these partners will only be subject to our Hotel's Privacy Policy if their data is received by our Hotel's system. Prior to this, their data will be processed by our sales intermediary partners.

Once your data is received by our system, it will be processed in full in accordance with the Privacy Policy.

**Name of the data processor:**

Company name: thePass Ltd (Sabecapp)

Company registration number: 01-09-172346

Tax number: 24327567-2-42

Head office: 1061 Budapest, Király utca 30-32. building A. 105.  
Privacy notice: <https://www.sabeeapp.com/hu/security-compliance>

The data processor provides our website with the plugin that we use to run our booking system.

**Purpose of data processing:** proper functioning of our reservation system, provision of the service

**Legal basis for processing:** the data subject's consent by making the reservation.

**Duration of processing:** until the termination of the contract between the controller and the processor or until the withdrawal of the data subject's consent.

**Scope of data processed:** the processor may have access to personal data provided during the booking.

### **III. Partner facilitating electronic online and on-site credit card payment services**

#### **A) When using the Sabeeapp booking system:**

Company name: **SecureTrust**  
Location: 70 W. Madison St.  
Suite 600  
Chicago, IL 60602  
Contact: <https://www.securetrust.com/contact/>

#### **SabeePay**

Company name: thePass Ltd (Sabeeapp)  
Company registration number: 01-09-172346  
Tax number: 24327567-2-42  
Head office: 1061 Budapest, Király utca 30-32. building A. 105.  
Privacy notice: <https://www.sabeeapp.com/hu/security-compliance>

#### **B) When paying by credit card on the spot:**

Company name: **OTP Bank Nyrt.**, 1051 Budapest, Nádor utca 16.  
OTP Bank Plc, 1876 Budapest  
E-mail address: [informacio@otpbank.hu](mailto:informacio@otpbank.hu)  
Telephone number: (+36 1/20/30/70) 3 666 666  
Data subjects may also contact the Data Protection Officer of OTP Bank in writing with their comments on data processing:  
Zoárd Gasmár  
1131 Budapest, Babér u. 9.  
[adatvedelem@otpbank.hu](mailto:adatvedelem@otpbank.hu)  
More information: <https://www.otpbank.hu/portal/hu/adatvedelem>

#### **C) Stripe, Inc.**

Data Processor Name: **Stripe, Inc.**  
354 Oyster Point Boulevard, South San Francisco, California, 94080  
E-mail: [privacy@stripe.co](mailto:privacy@stripe.co)  
More information: <https://stripe.com/en-hu/privacy>

#### **D) Querko (QR code payment system)**

Data processor name: **Qerko s.r.o.**  
Head office: 598/3 Pivovarská, Prague 5  
commercial identification number: 06678815  
<https://www.qerko.com/hu#contacts>

A QR code payment system, which can be used in the restaurant area, is located on each table and manages the guest's name and e-mail address, and sends the bill to the guest. The guest has the possibility to subscribe to the newsletter of the Service Provider (Accommodation), in which case his/her name and e-mail address will be transmitted to the Service Provider by the Qerko system. Chapter V, point 4)

**The purpose of the processing:** to ensure the functioning of the payment service for online reservations, to provide on-site payment by credit card in the restaurant (in case of Qerko only in the restaurant area) and in the accommodation, to ensure the secure electronic payment of the requested product.

**Legal basis for processing:** consent of the data subject, performance of a legal obligation.

**Duration of processing:** the Processor processes the data for the purpose of providing the service, and thus processes the data entrusted to it until this is achieved, at the latest until the termination of the contract. Invoicing, accounting - for 8 years after termination of the contract; Customer complaint handling - for 5 years; Prevention of money laundering and terrorist financing - for 8 years after termination of the contract.

**Scope of the data processed:** Data that the data processor receives from the data controller in order to be able to complete the payment and the information relating to it: data relating to the purchase (e.g. amount of the purchase, items). Data required to complete the payment by bank transfer (e.g. telephone number, e-mail). Data generated during the payment transaction by credit card and bank transfer: transaction data (e.g. identifiers, date, content of payment transactions).

#### **IV. Data processing partner for billing services**

**Name of data processor:** Számlázz.hu - KBOSS.hu Kft.

**Registered office:** 1031 Budapest, Záhony utca 7/D.

Representative name: Ángyán Balázs managing director

Company registration number: 01-09-303201

Tax number: 13421739-2-41

E-mail: [info@szamlazz.hu](mailto:info@szamlazz.hu)

Data Protection Officer: Dr. Istvánovics Éva lawyer

Contact: [dpo@kboss.hu](mailto:dpo@kboss.hu)

For more information about our partner's data management activities, please click here

<https://www.szamlazz.hu/adatvedelem/>

**Purpose of data processing:** the data processor is provided with the data necessary to issue an invoice to the data subjects, which the data processor stores in an online system and issues an invoice on behalf of the data controller using the parameters provided by the data controller, the data processor transmits the data in accordance with the data processing prospectus of our partner.

**Legal basis for processing:** the data subject's consent to the use of the service, the data processor processes the data transferred to the extent and for the duration necessary for the performance of the service in the framework of its contractual relationship with the data controller.

**Duration of processing:** until the termination of the contract between the controller and the processor or until the withdrawal of the data subject's consent.

**Data processed:** the name, address, billing details and individual items of the invoice of the data subject.

## **V. Data processing partner for accounting services**

For the fulfilment of our tax and accounting obligations, our Hotel uses an external accounting service provider under contract, who also processes personal data of natural persons who have a contractual or paying relationship with our Hotel, for the purpose of fulfilling the tax and accounting obligations of our Hotel (see Data Processing Based on Legal Obligations, Chapter VII.3.) Name and contact details of this data processor:

### Accountant

Name: Aurum Accounting Business Accounting and Economic Services Ltd.

Registered office: 1139 Budapest, Tahi utca 40/a fsz. 3.

Address for correspondence: 1133 Budapest, Árbóc utca 6. 5. floor.

E-mail: [info@aurumgroup.hu](mailto:info@aurumgroup.hu)

Data processed: billing name, billing address, tax number, tax identification number.

## **VI. Data processing partner supporting restaurant and accommodation services**

In order to provide our accommodation, restaurant and café services, we use the services of a third party catering service provider who processes the personal data of the natural persons concerned (name given at the time of booking, contact details: telephone number or email address) in accordance with the provisions of Chapter V of the Privacy Policy. The names and contact details of these data processors are set out below:

Name of data processor: **Primestore Kft.**

Headquarters: 1146 Budapest, Thököly út 71. basement 1.

E-mail: [info@placcon.hu](mailto:info@placcon.hu) , [help@placcon.hu](mailto:help@placcon.hu)

Tax number: 25121797-2-42

Company registration number/registration number: 13 09 173686

We use a third party catering service provider to operate a loyalty scheme to provide our accommodation, restaurant and café services. The natural persons concerned may apply for a loyalty card by registering with our partner, and their name and e-mail address will be transmitted to us via our partner if they wish to subscribe to our newsletter through our partner's system. The guest has the possibility to subscribe to the newsletter of the Service Provider (Yalty) during the use of the system, in which case his name and e-mail address will be transmitted to the Service Provider by the Yalty system. Chapter V, point 4)

Name of data processor: **Yalty Kft.**

registered office and mailing address: Hungary 6726 Szeged, Tanács utca 1.

e-mail address: [office@yalty.com](mailto:office@yalty.com)

telephone number (30) 206 3620

[https://yalty.com/views/adatkezelesi\\_tajekoztato.html](https://yalty.com/views/adatkezelesi_tajekoztato.html)

## **VII. Data processing partner sending the newsletter**

**Data Processor Name: MailerLite Limited**

Registered office: 88 Harcourt Street, Dublin 2, D02 DK18, Ireland

Website, contact: [mailerlite.com](https://www.mailerlite.com)

Privacy notice: <https://www.mailerlite.com/legal/privacy-policy>

(For the time, purpose, legal basis and scope of the data processed, see. Chapter V, point 4)

Closed: 20 March 2025.

## NOTICE ON THE USE OF A CAMERA SYSTEM

Dear Guest!

Please be informed that our Hotel **Lujza & Koriander** (hereinafter referred to as "the Hotel") will not use the rooms and other private rooms, toilets, etc. The Hotel shall use a camera surveillance system for the purpose of protecting human life, physical integrity, personal liberty, business secrets and the protection of property, which allows the recording of images, on the basis of which the behaviour of the data subject recorded by the camera may be considered personal data. If you enter the designated premises, the camera may also record your behaviour.

The purpose of video surveillance and data processing: In addition to live camera surveillance, the purpose of data processing is to reconstruct the activities of natural persons within the cameras' field of view, to prove the rights and obligations set out in the contract, to cooperate in evidence-gathering procedures during official proceedings, and to ensure the protection of natural persons and property protection in relation to the data controller's assets.

Legal basis for processing: the legitimate interests of our accommodation and the voluntary consent of the data subject. If you enter the monitored area, your consent is deemed to be given for the purpose of taking the picture. Please do not enter our Dining Area or our café/restaurant without consenting to the taking and storing of the images. With regard to our data management activities based on legitimate interest, we have prepared a balancing of interests test on the use of security cameras, a copy of which is available at our reception and will be presented upon request.

The place of storage of the recording is Lujza és Koriander Korlátolt Felelősségű Társaság (registered office: 2600 Vác, Ady Endre sétány 5.)

Duration of storage: Recordings may be retained for a maximum of 12 (twelve) working days in the absence of use, after which they will be deleted. Use is deemed to be made if the recorded images and other personal data are intended to be used as evidence in judicial or other official proceedings. Any person whose right or legitimate interest is affected by the recording of the image recording may, within 3 (three) working days of the recording of the image recording, request that the data controller not destroy or erase the data by providing evidence of his or her right or legitimate interest.

The system is operated by Lujza és Koriander Korlátolt Felelősségű Társaság

Persons entitled to access data: the data recorded by the camera surveillance system may be accessed by the managers of our accommodation facility at any time, in addition to those authorised by law to do so, for the purpose of detecting infringements and monitoring the operation of the system. At the time of issuing this information, these persons are László Dániel Pajor and Tibor Levente Pajor.

Your rights as a data subject and the rules for enforcing those rights are set out in 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: the Regulation), and Act CXII of 2011 on the right to self-determination and freedom of information. In accordance with Articles 12-21 of the Regulation, the data subject may request the data controller to access, rectify, erase or restrict the processing of personal data concerning him or her, and may object to the processing of such personal data and exercise his or her right to data portability. Under the conditions laid down by law, you may request information about our camera data processing, data correction, deletion, blocking, object to the processing of personal data, and take legal action in the event of a violation of your rights. Further information on camera surveillance can be found in the Service Provider's data processing information, which is available on our website and at the reception desk, and will be provided by our staff upon request. The same policy also contains information on how to lodge a complaint and contact us, as well as our protocol for handling complaints (see Chapters XII-XIV of the Data Protection Policy). In the event of a violation of their rights under the Regulation, the data subject may lodge a complaint with the data controller at the contact details provided. The data subject may also lodge a complaint with the National Data Protection and Freedom of Information Authority at the contact details below.

Contact details of the data protection supervisory authority:

National Authority for Data Protection and Freedom of Information  
Address: 1055 Budapest, Falk Miksa utca 9-11.  
Website: <http://naih.hu>  
Postal address: 1363 Budapest, Pf.: 9.  
E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)  
Phone number: +36 (1) 391-1400

Data Controller:

Lujza és Koriander Korlátolt Felelősségű Társaság  
Location: 2600 Vác, Ady Endre sétány 5.  
Company registration number: 13-09-204981  
Tax number: 25958625-2-13  
represented by: László Dániel Pajor and Tibor Levente Pajor, managing directors individually