**PRIVACY POLICY**

**Hotel OTP Budapest**

Data processing is carried out in accordance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter: GDPR or General Data Protection Regulation) and the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information (hereinafter: Information Act)**.**

**CIL Babér Kft.** (registered office: H-1051 Budapest, Nádor utca 16., hereinafter: Company) as the operator of **Hotel OTP Budapest** ensures the lawfulness and expediency of data processing in respect of the personal data processed by it in all cases. The purpose of this information is to provide our guests booking their accommodation and providing their personal data with adequate information about the conditions and guarantees under which our company processes their data and the duration of data processing even before booking or providing their personal data. Our company adheres to the contents of this notice in all cases involving personal data processing and we are bound by what is described here.

This Privacy Notice is valid until its withdrawal. The company reserves the right to amend the Privacy Notice and will provide notification thereof by publishing the amended Prospectus on the website.

1. **THE CHARACTERISTICS OF DATA PROCESSING ACCORDING TO THIS PRIVACY NOTICE ARE SUMMARIZED IN THE FOLLOWING TABLE**

## 1.1 DATA PROCESSING RELATED TO REQUEST FOR QUOTATION AND ONLINE ACCOMMODATION BOOKING

Our company provides an opportunity for our guests to electronically request a quotation on the prices of rooms and services. The offer is made by our Company through an electronic system, taking into account the available capacities.

We also offer our guests the option to book accommodation online so that they can book a room quickly, comfortably and free of charge.

In addition to the above, based on the consent of the data subject, we try to help our guests prepare for their trip and shorten the time spent checking into the accommodation upon arrival by means of a pre-arrival email. Because, the pre-arrival e-mail serves for online check-in and it contains useful information, including the current weather forecast and programme recommendations.

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| PURPOSE OF DATA PROCESSING | LEGAL BASIS OF DATA PROCESSING | SCOPE OF PROCESSED DATA | DURATION OF DATA PROCESSING |
| By electronic quotation, prior information about hotel prices (providing an exact quotation, preparing a reservation) | The processing is necessary to take steps at the request of the data subject prior to the conclusion of the contract – Article 6 (1) (a) of the GDPR | salutation; surname and first name; telephone number; e-mail address; number of guests (number of adults, number of children) | - in case of successful quotation, two years after the last day of the stay as per the booked date- in case of a rejected quotation, until the date of rejection,- if there is no response to the quotation, until the day after the expiry of the quotation |
| Providing electronic booking | Necessary for the performance of the contract, pursuant to Article 6 (1) (b) of the GDPR | salutation; surname and first name; address (country, postal code, city, street, house number); telephone number; e-mail address, date of arrival, date of departure, number of adults, number of children, room type, payment method, possible food sensitivity data; in the case of a business association, company name and registered office, bank card number | Personal data received during the reservation will be processed for the duration of the contractual relationship with the data subject, except: data to be retained under Act C of 2000 on Accounting for 8 years, and data to be retained under Act CL of 2017 on the Rules of Taxation until the last day of the 5th year following the year in question |

**1.2. MEASURING SATIETY**

As a hotel, we aim to provide our guests with a high standard of service, which is why we constantly ask our guests for feedback on their experience during their stay in our hotel.

During the satisfaction measurement, our Company does not aim to identify the data subject, no personal data is required for the completion of the survey, and the data subject cannot be identified from the answers.

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| PURPOSE OF DATA PROCESSING | LEGAL BASIS OF DATA PROCESSING | SCOPE OF PROCESSED DATA | DURATION OF DATA PROCESSING |
| Requesting feedback from hotel guests in order to further develop and improve our services. | Consent of the data subject pursuant to Article 6 (1) (f) of the GDPR | name, email address | Two years after the last day of the stay booked. |

**1.3. COOKIE DATA MANAGEMENT**

Cookies are small programs that help the functional operation of the website you visit, collect data for traffic analysis purposes, or serve marketing purposes.

During the use of cookies, these small programs or data packages are placed on the user’s computer and stored there for a longer or shorter period of time. During the use of cookies, the website “asks” the user’s computer or other means to store data about the use of the computer in the user’s browser. Cookies are either from the site you are visiting or from a third party. Cookies allow the website to “remember” certain actions or preferences of the user. Cookies help identify users, record users’ unique settings related to the use of the website, and allow users to use the websites without re-entering data (e.g. remembering passwords).

Some of the cookies are managed by an external web server, these cookies are called HTTP header cookies. Another way to store cookies is through JavaScript code found or referenced on that page. In practice, the process can be described as follows: every time the user wants to use the page again, the web server can receive the data of the previously set cookies, making it easier and more convenient to load and use the previously used page.

Cookies and other similar technologies may be able to identify specific individuals, and therefore their use for the purposes of the General Data Protection Regulation constitutes the processing of personal data.

Cookies and other similar technologies are used when visiting all websites. Questions about the processing of cookies refer to the information provided to users or the need for their consent.

Cookies used by the website:

1. **Cookies that provide basic functionality**

Basic functionality cookies help us make our website usable by enabling basic features such as site navigation and access to secure areas of the website. The website cannot function properly without these cookies.

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| PURPOSE OF DATA PROCESSING | LEGAL BASIS OF DATA PROCESSING | Expiration |
| To ensure the proper functioning of the website. | Legitimate interest of the controller pursuant to Article 6 (1) (f) of the GDPR | 12 months |

1. **Statistical cookies**

By collecting and reporting data in an anonymous form, statistical cookies help the website owner understand how visitors interact with the website.

They provide information about the number of users, the number of visits to each page,

dates, durations, device with which the visit took place (mobile, desktop, tablet, display size, operating system type), maximum city level, geographical location of the visit, frequency of the visit (proportion of recurring or new visits).

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| PURPOSE OF DATA PROCESSING  | LEGAL BASIS OF DATA PROCESSING  | Expiration  |
| To ensure the proper functioning of the website. | Consent of the data subject pursuant to Article 6 (1) (a) of the GDPR | \_ga 2years\_gid 24hours\_gat\_gtag\_<property-id>session |

To remove cookies from your device:

You can remove all cookies from your device by clearing your browsing history. This will delete all cookies associated with the websites you visit.

However, keep in mind that you may lose some saved information (e.g. login credentials, search settings) by deleting your history.

Manage site-specific cookies:

If you would like to define in more detail the options for the use of site-specific cookies, you can check and change the privacy and cookie settings of the browser you are using as you wish.

To disable cookies:

Most of the browsers currently in use allow users to disable all cookies on their machines. However, in this case, the necessary settings must be made separately on each website. Some services and features may not work properly at all (e.g., creating a user profile, logging in).

**1.4. DATA PROCESSING FOR CAMERA SURVEILLANCE**

Cameras (CCTV) are operated in the hotel area to ensure the safety and security of guests and property. The cameras provide continuous surveillance (live view) and record footage.

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| PURPOSE OF DATA PROCESSING  | LEGAL BASIS OF DATA PROCESSING  | SCOPE OF PROCESSED DATA  | DURATION OF DATA PROCESSING  |
| The purpose of data management is the effective protection of persons and propertyensuring and enabling the detection and proof of violations, andfacilitation. | Legitimate interest of the controller pursuant to Article 6 (1) (f) of the GDPR | those travelling in the area monitored by the monitoring systemfacial image, behaviour | Recorded images will be retained for 3 business days from the date of recording. |

**1.5. DATA PROCESSING RELATED TO TOURIST TAX RETURN AND INVOICE ISSUANCE**

Tax liability shall be imposed on an individual who, as a non-resident, spends at least one guest night in the jurisdiction of the municipality, and who is the owner of a building suitable for holiday or recreation in the jurisdiction of the municipality, which does not qualify as an apartment.

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| PURPOSE OF DATA PROCESSING  | LEGAL BASIS OF DATA PROCESSING  | SCOPE OF PROCESSED DATA  | DURATION OF DATA PROCESSING  |
| For the purpose of fulfilling the tax payment obligation required for the provision of accommodation services. | Fulfilment of a legal obligation under Article 6 (1) (c) of the GDPR | name, place of birth, date of birth, address, identity card number, start and end date of stay | Until the date specified in the law assigned to the data processing purposes or for two years after the last day of the stay of the booked date |
| Issue of an invoice | Fulfilment of a legal obligation under Article 6 (1) (c) of the GDPR | name, address, price, amount of payment, method of payment chosen, date of use of the service | According to the Accounting Act, 8 years from the date of issue of the invoice |

1. **DATA OF THE DATA CONTROLLER**

Name of the data controller: **CIL Babér Kft.** (registered address: H-1051 Budapest, Nádor utca 16.; postal address: 8636 Budapest, Parti sétány 159.; company registration number: 01-09-896519; tel.: +36 84 560 911; e-mail: Budapest@otphotel.hu)

 Privacy contact: informacio@otpbank.hu

1. **RECIPIENTS OF PERSONAL DATA**

Recipient is a natural or legal person, public authority, agency or any other body to whom the personal data are disclosed whether a third party or not.

Our company always treats the personal data of the data subjects confidentially, transfers the data only to the recipients in the table below, only for the purpose of fulfilling a legal obligation, no data is transferred to other third parties.

* 1. **DATA TRANSFERS**

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| RECIPIENT OF DATA TRANSFER  | LEGAL BASIS FOR DATA TRANSFER | SCOPE OF DATA TRANSFER  | PURPOSE OF DATA TRANSFER  |
| National Tourism Agency | Fulfilment of a legal obligation according to Art. 6 (1) (c) GDPR | Anonymous statistical data | The Company provides anonymous statistics on the guest turnover of the accommodation on a daily basis through the accommodation management software. |
| District III Municipality Budapest | Fulfillment of a legal obligation according to Art. 6 (1) (c) GDPR | name, phone number, gender, email address, home address, date of arrival and departure, time of booking, nationality | For the purpose of fulfilling the tax payment (IFA) obligation required for the provision of accommodation services. |

* 1. **USE OF SUB-DATA PROCESSOR**

In order to make the service more convenient and customized, the Data Processor uses additional data processors as follows:

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| Sub-processor name | Registered office | Description of the sub-processor task |
| Hostware Kft. | H-1149 Budapest, Róna utca 120-122. | Performing customer management tasks when using the Hostware Front Office hotel system. |
| OTP Mobil Kft. | H-1093 Budapest, Közraktár u. 30-32. | Conducting data communication necessary for payment transactions between the merchant and the payment service provider’s system, providing customer support to users, confirming transactions and fraud monitoring to protect users. |

In addition to the above, some authorities, public bodies and courts may contact our company for the purpose of communicating personal data. Our Company shall disclose personal data to these bodies only to the extent and to the extent strictly necessary to achieve the purpose of the request and if the relevant body has indicated the exact purpose and scope of the data, and if the fulfillment of the request is required by law.

1. **DATA SECURITY**

Our company’s computer systems and other data storage locations are located at the headquarters and on servers rented by the data processor. Our Company selects and operates the IT tools used for the processing of personal data during the provision of the service in such a way that the processed data:

* Accessible to authorised persons (availability);
* its authenticity and authentication is ensured (authenticity of data processing);
* its invariance can be verified (data integrity);
* protected against unauthorized access (data confidentiality).

We pay particular attention to the security of the data, and also take the technical and organizational measures and establish the procedural rules necessary to enforce the guarantees under the General Data Protection Regulation. In particular, the data will be protected by appropriate measures against unauthorized access, alteration, transfer, disclosure, deletion or destruction, as well as accidental destruction, damage and inaccessibility due to changes in the technology used.

Both our company and our partners’ IT systems and networks are protected against computer-aided fraud, computer viruses, computer intrusions and denial of service attacks. The operator ensures security with both server-level and application-level protection procedures. Data is backed up daily. In order to prevent data protection incidents, our company will take all possible measures, and in the event of such an incident – in accordance with our incident management policy – we will take immediate action to minimize risks and eliminate damages

1. **RIGHTS OF THE DATA SUBJECT IN RELATION TO DATA PROCESSING**

In accordance with Articles 12-21 of the General Data Protection Regulation, the data subject may request the data controller to access, rectify, restrict or delete the processing of personal data relating to him or her, or to withdraw consent.

## In the event of a violation of the data subject’s rights set out in the General Data Protection Regulation, the data subject may complain to the data controller at the contact details set out in point 2.

In the case of data processing based on consent, the consent is always voluntary and can be withdrawn at any time during the data processing period. You may indicate your intention to withdraw your consent to the Company at any of the contact details specified in point 2. The revocation does not affect the lawfulness of the previous processing.

In accordance with Article 12 (3) of the General Data Protection Regulation, the Company shall fulfill the request of the data subject to exercise his/her rights without undue delay, but not later than within one month of its receipt. If necessary, taking into account the complexity of the application and the number of applications received, this deadline may be extended by a further two months. The Company shall inform the data subject of the extension of the deadline within one month of the receipt of the request, indicating the reasons for the delay.

If the data subject has submitted the application electronically, the response should also be provided electronically, if possible, unless the data subject requests it in another form explicitly stated in his/her application.

* 1. **RIGHT TO ACCESS**

The data subject shall have the right to request information from the Company through the contact details provided in this notice as to whether or not his or her personal data is being processed and, if such processing is being carried out, the right to know that the Company:

* What personal data you process; on what legal basis; for what data processing purpose and for how long;
* to whom, when, under what law, to which personal data you have granted access or to whom you have transferred your personal data; from which source your personal data comes;
* apply automated decision making and, if so, have the right to know its logic, including profiling.

The Company shall provide a copy of the personal data subject to data processing free of charge at the request of the data subject for the first time, then in accordance with Article 12 (5) of the General Data Protection Regulation, if the data subject’s request is clearly unfounded or, in particular due to its repetitive nature, may charge a reasonable fee based on excessive administrative costs or refuse to act on the request.

In order to meet the data security requirements and to protect the rights of the data subject, the Company is obliged to ensure that the identity of the data subject and the person wishing to exercise his/her right of access match, and for this purpose, the provision of information, access to the data and the issuance of a copy thereof are also subject to the identification of the data subject.

* 1. **RIGHT TO RECTIFICATION**

The person concerned may request in writing, through the contact details provided in this notice, that the Company amend or clarify any of his/her personal data, provided that he/she can credibly prove the accuracy of the corrected data. If you send the application to the Company electronically, the Company will also send your reply letter electronically. If you request a different way to send your response, please indicate this in your request.

* 1. **RIGHT TO RESTRICTION OF PROCESSING (BLOCKING)**

The person concerned may request through the contact details provided in this notice that the processing of his/her personal data be restricted by the Company (with a clear indication of the limited nature of the processing and ensuring separation from other data) if:

* Dispute the accuracy of your personal data (in this case, the Company will limit the processing to the period for which it verifies the accuracy of your personal data);
* considers the processing to be unlawful, but the data subject opposes the erasure of the data and instead requests the restriction of their use;
* the controller no longer needs the personal data for the purposes of processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
* the data subject has objected to the processing (in this case, the restriction applies for the period until it is established whether the legitimate grounds of the controller override the legitimate grounds of the data subject).
	1. **DATA PORTABILITY**

You have the right to receive the personal data concerning you and which you have provided to the Company in a structured, commonly used and machine-readable format and the right to transfer this data to another controller without hindering the Controller if:

- The processing is based on consent or a contract; and

- data processing is carried out by automated means.

* 1. **RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)**

The data subject may request the Company to delete his/her personal data in writing through the contact details provided in this notice.

The Company is obliged to delete personal data concerning you without undue delay if, among other things, one of the following reasons applies:

- Personal data is no longer required for the purpose for which it was collected or otherwise processed;

- you withdraw your consent and there is no other legal basis for the processing;

- the legal basis for the processing is a legitimate interest, public interest or public authority, and there is no overriding legitimate reason for the processing, or

- if the personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for this purpose;

- the personal data have been processed unlawfully;

The Company will reject the erasure request only if it is legally obliged to store the personal data further.

* 1. **OBJECTION TO DATA PROCESSING**

You have the right to object to processing based on legitimate interest through any of the contact details indicated in point 2.

* 1. **RIGHT TO WITHDRAW CONSENT**

The data subject may withdraw his/her consent to data processing at any time during the period of data processing in writing through the contact details provided in this notice. In the event of withdrawal of consent, the Company’s data processing before withdrawal remains lawful.

## RIGHT TO AN EFFECTIVE JUDICIAL REMEDY

## If the data subject considers that the Company has violated the applicable data protection rules when processing his/her personal data, he/she may file a complaint with the National Authority for Data Protection and Freedom of Information (address: H-1055 Budapest, Falk Miksa utca 9-11; mailing address: 1363 Budapest, P.O. box: 9.; phone: +36-1-391-1400; email: ugyfelszolgalat@naih.hu). The data subject shall also have the right to lodge a complaint with another supervisory authority, in particular a supervisory authority established in the European Union Member State of his or her habitual residence.

A lawsuit may also be brought against the data controller in court for violation of the rules on the processing of personal data. The data subject may initiate the lawsuit before the Metropolitan Court of Justice or the court of his/her place of residence. In Hungary, the contact details of the tribunals can be found at the following link[: http://birosag.hu/torvenyszekek](http://birosag.hu/torvenyszekek). If the data subject is habitually resident in another Member State of the European Union, the action may also be brought before the competent court of the Member State of habitual residence.