

DANUBIUS FRIENDS LOYALTY PROGRAM

PRIVACY POLICY

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The following text was generated by automatic machine translation from the original Hungarian version and does not constitute an official translation.

This Privacy Policy applies exclusively to data processing closely related to the loyalty program. Information regarding data processing in connection with room reservations, communications, complaints, and all other types of data processing can be found here:

www.danubiushotels.com/en/privacy-policy

1. Data Controller

Danubius Hotels Zrt.

Registered office: 1051 Budapest, Szent István tér 11.

Representative: Balázs Kovács, Chief Executive Officer

Email: adat@danubiushotels.com

(hereinafter referred to as the “Data Controller”)

2. Data Processing

By joining the loyalty program, Guests consent to the processing of their personal data by the Data Controller for marketing purposes, including creating a specialized guest profile, providing discounts, and sending relevant notifications. A detailed description of data processing, including specific sub-purposes within the marketing scope and the rights associated with each data processing activity, is summarized in the table below.

Data	Purpose of data processing	Data retention period	Legal basis of data processing	Rights
Registration: Title; Surname*; First Name* Preferred form of address Email address* Phone number Country*; Preferred communication language* Date of birth* Additional profile data: Membership ID* Membership level* Date of joining* (* indicates mandatory fields)	Marketing purpose: Joining the loyalty program, creating a user account on the guest portal, communication, providing discounts. For date of birth: Providing birthday discounts, age verification, statistical purposes.	Until deletion of profile and membership.	Your consent [GDPR Art. 6(1)(a)], given upon joining. Consent can be withdrawn at any time: Personal data can be modified; phone number can be modified or deleted in the profile. Name and email modifications or complete profile deletion can be requested at friends@danubiushotels.com. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.	3.1. 3.2. 3.3. 3.4. 3.5. 3.6.
Notifications about discounts: Name, email, phone, country, city, address, postal code, preferred language, marketing consent, booking and consumption history, booking preferences	Marketing purpose: Notifying members about discounts.	Until deletion of profile and membership. Preferences can be set.		
Virtual loyalty card: Name, email, membership ID, membership level, date of joining, preferred language	Marketing purpose: Providing an easy-to-use virtual card compatible with digital wallets.	Until deletion of profile and membership.		
Discounted bookings: Arrival and departure dates, arrival time, hotel	Marketing purpose: Managing bookings to ensure loyalty	Until deletion of profile and membership;	Your consent [GDPR Art. 6(1)(a)], given upon joining. Consent can be withdrawn at any time: Complete profile deletion can be	3.1. 3.2. 3.3.

name, booking codes, booking channel (e.g., booking.com), rate code data, room type, booking preferences (PMS codes), membership ID, membership level	discounts, communication related to bookings and discounts.	however, data related to the last stay is retained for 5 years after departure.	requested at friends@danubiushotels.com. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. If the profile is deleted, data related to bookings will be retained after departure or cancellation based on our legitimate interests [GDPR Art. 6(1)(f)] for complaint handling and traceability. You can object to this data processing at any time via contact details provided in point 1.	3.4. 3.5. 3.6. 3.7.
Loyalty member preference questionnaire: Answers provided to questionnaire questions	Marketing purpose: Sending personalized discounts and marketing communications, statistical purposes.	Until withdrawal of consent (deletion of responses).	Your consent [GDPR Art. 6(1)(a)], given within the profile. Consent can be withdrawn anytime by deleting answers. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.	3.1. 3.2. 3.3. 3.4. 3.5. 3.6.
Data transfer to Meta Ads, Google Ads, Microsoft Ads: Email address (hashed), phone number (hashed), first name/surname (optionally hashed), postal code (optionally hashed), country (optionally hashed), year of birth (optionally hashed)	Marketing purpose: Displaying targeted ads for loyalty members on other channels and reaching similar target audiences.	Until withdrawal of consent.	Your consent [GDPR Art. 6(1)(a)], given upon joining. Consent can be withdrawn anytime within the profile. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.	3.1. 3.2. 3.3. 3.4. 3.5. 3.6.
Abandoned cart reminder and newsletters not limited to Danubius Friends members:	Marketing purpose: Sending newsletters and abandoned cart reminders.	Until unsubscribing.	Your consent [GDPR Art. 6(1)(a)], given upon subscribing to the newsletter and/or upon joining. Consent can be withdrawn anytime through the unsubscribe link or at friends@danubiushotels.com. Withdrawal of consent does not affect the lawfulness of	3.1. 3.2. 3.3. 3.4. 3.5. 3.6.

			processing based on consent before its withdrawal.	
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Data Transfer for Marketing Purposes

As detailed in the table above, we transfer the following hashed or optionally hashed data—email address, phone number, first name/surname, postal code, country, year of birth—to advertising platforms (Meta Ads, Google Ads, Microsoft Ads) to display targeted advertisements to loyalty members and to reach similar audience groups.

When transferring data to Meta, the operator of Facebook and Instagram pages ensures ad delivery and provides page analytics functionality. Page analytics present aggregated data, helping the Data Controller understand how visitors interact with the given page and its advertisements, enabling the Data Controller to draw conclusions for more efficient operation. No personal data appears in these statistical analyses. Data processing for advertising and statistical purposes on these pages constitutes joint data processing between the Data Controller and Meta Platforms Ireland Limited (Serpentine Avenue, Block J, Dublin 4, Ireland). Details of the joint data processing agreement can be found in the Facebook Page Insights Controller Addendum, available at the following link:

https://www.facebook.com/legal/terms/page_controller_addendum

The recipients of these transfers act as independent data controllers. Their privacy notices can be accessed at:

- **Facebook and Instagram:** Meta Platforms Ireland Limited (Address: Serpentine Avenue, Block J, Dublin 4, Ireland; <https://www.facebook.com/privacy/explanation>, <https://www.facebook.com/help/instagram/155833707900388/>)
- **Google:** Google Ireland Limited (Address: Gordon House, Barrow Street, Dublin 4, Ireland; <https://policies.google.com/technologies/product-privacy?hl=en>)
- **Microsoft:** Microsoft Corporation (Address: One Microsoft Way, Redmond, Washington 98052 USA; Microsoft Hungary Ltd. Headquarters: Graphisoft Park 3 (Záhony u.), 1031 Budapest; <https://www.microsoft.com/en-us/trust-center/privacy>)

3. Your Rights

Regarding data processing, you have the rights detailed in sections 3.1 to 3.7. If you wish to exercise any of these rights, please contact us using one of the contact details indicated in section 1.

Identification

Before fulfilling your request, we must verify your identity. If we cannot verify your identity, unfortunately, we cannot fulfill your request.

Responding to Requests

Following identification, we will provide you with information about your request in writing, electronically, or orally upon your request. Please note that if you submitted your request electronically, we would respond electronically as well. Of course, you have the option to request a different method.

Time Limit for Handling Requests

We will inform you of the measures taken regarding your request within 1 (one) month from the receipt of the request. This period may be extended by an additional 2 (two) months if necessary, considering the complexity and number of requests. In such cases, you will be notified within the initial 1-month period.

We are obliged to inform you within one month if we do not take action regarding your request. You can lodge a complaint about this to the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) (section 4.1) and have the right to seek judicial remedy (section 4.2).

Fees for Handling Requests

Providing the requested information and measures is free of charge. Exceptions apply if the request is clearly unfounded or excessive, especially due to its repetitive nature. In such cases, we may charge a fee or refuse to fulfill the request.

3.1. Withdrawal of consent

In cases where data processing is based on your consent, you may withdraw this consent at any time. In such cases, we will immediately and irreversibly delete your personal data related to the specific data processing. Please note that the withdrawal of consent does not affect the lawfulness of processing carried out based on consent prior to its withdrawal. Consent can be given and withdrawn separately for each processing purpose.

Methods of giving and withdrawing consent within the loyalty program:

Data processing	Method of giving consent	Method of withdrawing consent
Profile, notifications about discounts, virtual card, booking discounts, marketing communications via email and on Meta, Microsoft, and Google platforms	You accepted the terms outlined in the Privacy Policy and gave consent upon joining.	Personal data can be modified; phone number can be changed or deleted in your profile. To modify your name and email or to delete your entire profile, please contact us at friends@danubiushotels.com .
Notifications based on preferences	You answered questions in your profile.	Delete your responses.
Data transfer to Meta, Microsoft, and Google for targeted marketing purposes	You accepted the terms outlined in the Privacy Policy and gave consent upon joining.	Withdraw consent within your profile.
"Cart abandonment" reminder and newsletter not limited to Danubius Friends members	You subscribed to the newsletter (e.g., via the website) and/or accepted the terms outlined in the Privacy Policy upon joining.	Withdraw consent via the unsubscribe link or by contacting friends@danubiushotels.com .

3.2. Right to request information (access)

You may request confirmation regarding whether your personal data are being processed, and if so, information about the following:

- The purpose of processing;
- The categories of personal data involved;
- To whom these data are transferred;
- The retention period of your personal data;
- Your rights and available remedies related to data processing;
- The source of your personal data;
- Whether automated decision-making involving your personal data is used. In such cases, you can also request details on the logic (method) involved, its significance, and the expected consequences;
- If your data has been transferred to an international organization or a third country (non-EU member state), you may request information regarding the guarantees that ensure appropriate data handling;
- You may request a copy of your personal data (additional copies may incur an administrative fee).

3.3. Right to rectification

You have the right to request correction or completion of inaccurate or incomplete personal data.

3.4. Right to erasure ("right to be forgotten")

You may request deletion of your personal data if:

- The personal data are no longer needed for the purposes for which they were collected;
- Data processing was based on your consent, and you withdraw this consent;
- It has been established that your personal data are processed unlawfully;
- Your objection to processing was successful;
- EU or national law mandates deletion;
- Personal data were collected in relation to offering information society services to children.

Personal data cannot be deleted if processing is necessary:

- For exercising the right of freedom of expression and information;
- For compliance with a legal obligation under EU or national law applicable to the Data Controller or for tasks carried out in the public interest;
- For public health reasons in the public interest;
- For archiving purposes in the public interest, scientific or historical research, or statistical purposes if deletion would likely render impossible or seriously impair the achievement of such processing; or
- For the establishment, exercise, or defense of legal claims.

3.5. Right to request restriction of processing

You have the right to request restriction of processing of your personal data under the following circumstances:

- If you contest the accuracy of your personal data; in this case, the restriction applies for the period necessary to verify the accuracy of your personal data.
- If the data processing is unlawful, but you oppose the deletion of the data and instead request restriction of their use.
- If we no longer need the personal data for processing purposes, but you require them for the establishment, exercise, or defense of legal claims.
- If you have objected to the data processing; in this case, the restriction applies for the period until it is determined whether the Data Controller's legitimate grounds override your grounds.

During the restriction period, your personal data may only be processed with your consent, or for the establishment, exercise, or defense of legal claims, for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or a Member State. You will be informed in advance of any lifting of the restriction.

3.6. Right to data portability

You have the right to receive the personal data you provided to us in a structured, commonly used, machine-readable format, and you have the right to transfer these data to another data controller, or to request us to transfer them directly to another controller, provided that the data processing is based solely on your consent or is necessary for the performance of a contract with you or made in your interest, and the data processing is carried out by automated means.

This right does not apply if the processing is necessary for the performance of a task carried out in the public interest. This right must not adversely affect the rights and freedoms of others and cannot infringe upon the right to erasure.

3.7. Right to object

You have the right to object to the processing of your personal data if the processing is based on legitimate interests, direct marketing purposes (e.g., sending newsletters), or the performance of a task carried out in the public interest. In such cases, your personal data will be erased unless there are compelling legitimate grounds for processing that override your interests, rights, and freedoms, or if the processing is necessary for the establishment, exercise, or defense of legal claims.

You may also object to the processing of your personal data for scientific or historical research or statistical purposes. In such cases, your personal data will be erased unless processing is necessary for the performance of a task carried out for reasons of public interest.

4. Legal Remedies

4.1. Right to Lodge a Complaint with the NAIH

If you believe that the processing of your personal data is in violation of the provisions of the Data Protection Regulation (GDPR), you have the right to lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH).

NAIH

President: Dr. Attila Péterfalvi

Postal address: 1363 Budapest, Pf. 9.

Office address: 1055 Budapest, Falk Miksa utca 9-11.

Telephone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Website: <http://naih.hu>

Email: ugyfelszolgalat@naih.hu

4.2. Right to Judicial Remedy

If you believe that the processing of your personal data violates the provisions of the Data Protection Regulation and thus infringes your rights under that Regulation, you have the right to seek judicial remedy.

In Hungary, the court proceedings fall under the jurisdiction of the regional courts (törvényszék). At your discretion, the lawsuit may be initiated at the regional court of your place of residence or habitual residence. Persons who otherwise lack procedural legal capacity may also be parties in the lawsuit. The Authority (NAIH) may intervene in the proceedings on behalf of the data subject. The court proceedings are governed not only by the Data Protection Regulation but also by the provisions stipulated in Act V of 2013 of the Hungarian Civil Code (Second Book, Part Three, Title XII, Sections 2:51-2:54), as well as other regulations concerning judicial proceedings.

4.3. Compensation and Damages

If the Data Controller unlawfully processes personal data, thereby causing damage or infringing upon your personality rights, you may claim damages or compensation. The Data Controller shall be exempt from liability and obligation to pay damages if it proves that the damage or infringement of personality rights was caused by an unavoidable event beyond the scope of data processing.

5. Data Security

We make every effort, considering the current state of science and technology, the cost of implementation, the nature of data processing, and the risks posed to the rights and freedoms of natural persons, to implement appropriate technical and organizational measures ensuring a level of data security appropriate to the risk.

Personal data are always handled confidentially, with restricted access, encryption, resilience maximized to the extent possible, and the capacity for restoration in the event of a problem. Our systems are regularly tested to guarantee security. When determining the appropriate level of security, we consider risks arising from data processing, especially those resulting from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access to personal data that are transmitted, stored, or otherwise processed.

We ensure that individuals under our control who have access to personal data process such data exclusively according to our instructions, unless deviation from these instructions is required by European Union or Member State law.

6. Data Processors

- **Sceptre Hospitality Resources, LLC** (address: 1334 Brittmoore Rd, #2410, Houston, TX 77043, United States; hereinafter: SHR): tool facilitating data recording, tracking changes, and communication. SHR is active under the EU-U.S. Data Privacy Framework (<https://www.dataprivacyframework.gov/list>).
- **Oracle** (2300 Cloud Way, Austin, United States; Hungary address: Oracle Hungary Kft., Budapest, Balatoni út 2/a, 1112): tool facilitating data recording and tracking changes. Oracle is active under the EU-U.S. Data Privacy Framework (<https://www.dataprivacyframework.gov/list>).
- **Skycore LLC** (address: 397 Moody St., Suite 202, Waltham, MA 02453, USA): provider of the virtual card service (WalletThat). The adequacy of data transfer is ensured through the application of Standard Contractual Clauses (https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en) and individual safeguards.

Appendix 1: Definitions used in the Privacy Policy

"Personal Data": Any information relating to an identified or identifiable natural person (data subject); for example: name, number, location data, online identifier, or data related to the physical, physiological, genetic, mental, economic, cultural, or social identity of the natural person.

"Data Subject": An identifiable natural person to whom the personal data relates (for example: website visitor, newsletter subscriber, job applicant).

"Data Processing": Any operation or set of operations performed on personal data or sets of personal data, whether automated or not, including collection, recording, organization, structuring, storage, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.

"Data Controller": The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

"Data Processing (Technical Handling)": The execution of technical tasks related to data processing operations.

"Data Processor": The natural or legal person, public authority, agency, or other body that processes personal data on behalf of the Data Controller (on its instructions and decision).

"Third Party": A natural or legal person, public authority, agency, or body other than the data subject, data controller, data processor, or persons who, under the direct authority of the data controller or processor, are authorized to process personal data.

"Consent of the Data Subject": Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they, by a statement or clear affirmative action, signify agreement to the processing of personal data relating to them.

"Recipient": A natural or legal person, public authority, agency, or other body to whom personal data are disclosed, irrespective of whether they are a third party. Public authorities that may receive personal data in the framework of a particular inquiry in accordance with EU or Member State law shall not be regarded as recipients.