**PRIVACY NOTICE**
**for contact persons, signatories and other persons acting on behalf of business partners**

## 1. Data Controller

**Danubius Hotels Zrt.**
**registered seat:** 1051 Budapest, Szent István tér 11.
**represented by:** Balázs Kovács, Chief Executive Officer
**e-mail:** adat@danubiushotels.com
**company registration number:** 01-10-041669
**tax number:** 10594702-2-44
**data protection officer:** dr. Erika Tihanyi (e-mail: adat@danubiushotels.com)

## 2. The individual processing activities

### 2.1. Communication with contact persons and other persons acting on behalf of business partners

In the course of our contractual or non-contractual relationships with our business partners, we share the contact details of our own contact persons and we process the contact details of the contact persons provided to us by our business partners.

| Data | Purpose of processing | Retention period | Legal basis of processing |
|---|---|---|---|
| **Personal data of the contact person(s) and re presentative(s):** *name*, *position*, *e-mail address*, *telephone number*, *any other personal data that may become necessary* | Keeping in contact, including in particular: communication for the purpose of submitting offers and concluding contracts, as well as the performance of the contract. | We process contact person data for the duration of the business relationship, until our business partner notifies us of a change of contact person. Data that also appear in the contract are further processed as set out in section 2.2. | Our **legitimate interest** in keeping in contact and in the performance of the contract. **You may object to the processing at any time via any of the contact details indicated in section 1.** [Article 6(1)(f) GDPR] |

Rights: 3.1.–3.5.

### 2.2. Contracts and the personal data contained in them

We sign contracts with our contractual partners, which we retain – as documents underlying our invoices – even after the termination of the contract; consequently, the personal data contained in the contracts are also retained.

| Data | Purpose of processing | Retention period | Legal basis of processing |
|---|---|---|---|
| **Personal data of contact persons, representatives and signatories appearing in the contract:**<br><br>*name, position, e-mail address, telephone number, any other personal data that may become necessary* | Compliance with a legal obligation | We retain signed contracts for 8 (eight) years following the termination of the contract. | **Compliance with a legal obligation**. Following invoicing, retention is required under tax and accounting rules[1]. Without providing the data, the contract cannot be concluded. [Article 6(1)(c) GDPR] |

Rights: 3.1., 3.2., 3.4.

### 2.3. Further information applicable to all processing activities

**Source of the data:** we primarily receive the personal data of contact persons, representatives and signatories from the business partner for which you act as contact person, representative or signatory, or directly from you when contact is established. The data may also originate from publicly accessible sources (in particular the company register or the partner's website).

**Recipients, processors:** personal data may be accessed by those employees of Danubius Hotels Zrt. who need them to perform their duties. As processors, we use the operator of our IT systems, our accounting service provider, and our document management and archiving service provider. In the event of a legal dispute, the data may also be transferred to our legal representative, as well as to an authority or court. Information on the current list of processors used may be requested via the contact details indicated in section 1.

**Transfers to third countries:** we do not transfer your personal data to countries outside the European Economic Area or to international organisations. Should this become necessary in the future, it would take place only subject to the appropriate safeguards under Chapter V of the GDPR, of which we would inform you in advance.

**Automated decision-making, profiling:** we do not carry out automated decision-making – including profiling – on the basis of your personal data.

**Legitimate interest assessment:** with respect to processing based on legitimate interest (section 2.1), we have carried out a legitimate interest assessment in which we examined whether our legitimate interest is proportionate to your interests and fundamental rights and freedoms. The essence of the assessment is made available to you on request via the contact details indicated in section 1.

## 3. Rights

In connection with the processing, you may have the rights detailed in the following sections, as indicated in section 2. If you wish to exercise any of them, please write to us at one of the contact details indicated in section 1.

*Identification*
Before fulfilling your request, we must in every case verify your identity. If we are unable to identify you, we are unfortunately unable to fulfil your request.

*Responding to the request*
Following identification, we provide information concerning the request in writing, electronically or – at your request – orally. Please note that if you submitted your request electronically, we will respond electronically. Naturally, in this case you may also ask for a different form of response.

*Time limit for handling requests*
We inform you of the measures taken in response to your request at the latest within **1 (one) month** of receipt of the request. Where necessary, taking into account the complexity and number of the requests, this period may be extended by a further 2 (two) months, of which we inform you within the 1 (one) month time limit.

We are also obliged to inform you within the one-month time limit if no action is taken. You may lodge a complaint against this with the NAIH (section 4.1) and seek a judicial remedy (section 4.2).

*Fees*
The information and measures requested are provided **free of charge**. An exception applies where the request is manifestly unfounded or excessive, in particular because of its repetitive character. In such a case we may charge a fee or refuse to act on the request.

### 3.1. You may request information (access)

You may request information as to whether your personal data are being processed and, if so:

- ✓ What is the purpose?
- ✓ Exactly which data are being processed?
- ✓ To whom do we transfer these data?
- ✓ For how long do we store these data?
- ✓ What rights and remedies do you have in this respect?
- ✓ From whom did we receive your data?
- ✓ Do we make automated decisions concerning you using your personal data? In such cases you may also request information on the logic (method) applied, as well as the significance and the envisaged consequences of such processing.
- ✓ If you have found that we transferred your data to an international organisation or a third country (a non-EU Member State), you may ask us to demonstrate what guarantees the appropriate handling of your personal data.
- ✓ You may request a copy of the personal data being processed (for any further copies we may charge a fee based on administrative costs).

### 3.2. You may request rectification

You may ask us to correct or complete your personal data that have been recorded inaccurately or incompletely.

**3.3. You may request the erasure of your personal data ("right to be forgotten")**

You may ask us to erase your personal data where:

- ✓ The personal data are no longer necessary for the purpose for which we processed them;
- ✓ You have withdrawn your consent and there is no other legal basis for the processing;
- ✓ Your objection is successful;
- ✓ It is established that we process the personal data unlawfully;
- ✓ EU or Hungarian law so requires.

We may not erase the personal data where they are necessary:

- ✓ for exercising the right of freedom of expression and information;
- ✓ for compliance with an obligation under EU or Member State law to which the controller is subject that requires the processing of personal data, or in the public interest;
- ✓ for reasons of public interest in the area of public health;
- ✓ for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as erasure is likely to render impossible or seriously impair that processing; or
- ✓ for the establishment, exercise or defence of legal claims.

**3.4. You may request the restriction of processing**

You may ask us to restrict processing where one of the following applies:

- ✓ You contest the accuracy of the personal data, in which case the restriction applies for a period enabling us to verify the accuracy of the personal data;
- ✓ The processing is unlawful, but you oppose the erasure of the data and request the restriction of their use instead;
- ✓ We no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims;
- ✓ You have 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 your legitimate grounds.

Where processing is restricted, the personal data may – with the exception of storage – only be processed with your consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State. We will inform you in advance before any restriction is lifted.

**3.5. You may object to the processing of your personal data**

You may object to the processing of your personal data where:

- ✓ The processing is necessary for the performance of a task carried out in the public interest; or
- ✓ The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child;

- ✓ The data are processed for direct marketing purposes (in this context you may also object to profiling);
- ✓ The personal data are processed for scientific or historical research purposes or statistical purposes.

If you object to the processing of your personal data, we will erase your personal data. An exception applies where the processing is justified by compelling legitimate grounds, including the public interest, or where the processing is necessary for the establishment, exercise or defence of legal claims.

**4. Remedies**

**4.1. You may lodge a complaint with the NAIH**

If you consider that the processing of personal data relating to you infringes the provisions of the 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.
address: 1055 Budapest, Falk Miksa utca 9-11.
telephone: +36 (1) 391-1400
customer service: +36 (30) 683-5969, +36 (30) 549-6838
web: http://naih.hu
e-mail: ugyfelszolgalat@naih.hu

**4.2. You may bring court proceedings**

If you consider that the processing of personal data relating to you infringes the provisions of the GDPR and that your rights under the GDPR have thereby been violated, you have the right to bring court proceedings.

The case falls within the competence of the regional court (törvényszék). At the data subject's choice, the proceedings may also be brought before the regional court having jurisdiction over the data subject's place of residence or place of stay. A person who otherwise lacks legal capacity to be a party may also be a party to the proceedings. The Authority may intervene in the proceedings in support of the data subject.

In addition to the provisions of the GDPR, the court proceedings are governed by Book Two, Part Three, Title XII (Sections 2:51–2:54) of Act V of 2013 on the Civil Code, as well as by the other statutory provisions applicable to court proceedings.

**5. Data security**

Taking into account the state of the art, the costs of implementation and the nature of the processing, as well as the risk to the rights and freedoms of natural persons, we make every effort to implement appropriate technical and organisational measures in order to ensure a level of data security appropriate to the risk.

We always process personal data confidentially, with restricted access, with encryption and by maximising resilience as far as possible, ensuring restorability in the event of an incident. We regularly test our systems in order to guarantee security. In assessing the appropriate level of security, we take account of the risks presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

We take all steps to ensure that persons acting under our authority who have access to personal data process those data only on our instructions, unless they are required to do so by EU or Member State law.

[1] *Pursuant to Section 169(2) of Act C of 2000 on Accounting, accounting documents directly or indirectly supporting the bookkeeping (including general ledger accounts and analytical and itemised records) must be retained in legible form for at least 8 years, in a manner retrievable by reference to the accounting entries.*