

Privacy Statement of „Paprika Hotel Kft.”

1. INTRODUCTION

„Paprika Hotel Kft.” (with its registered address at 9222 Hegyeshalom, Miklóshalmi utca 1.) (hereinafter referred to as „Paprika Hotel Kft.”, Service Provider and/or Data Controller) as data controller, acknowledges and agrees to be bound by the contents of this Privacy Statement. The Data Controller represents and agrees that any and all data processing performed in connection with its activities shall comply with the requirements set out herein and in the applicable laws valid from time to time.

The data protection guidelines applicable to the data processing issues arising in connection with the service available at the address are permanently available on the website www.paprikapanzio.hu.

“Paprika Hotel Kft.” reserves the right to amend and modify this Privacy Statement at any time. We shall notify our clientele on any changes in a timely manner.

In the event that our users have any question that cannot be unequivocally answered on the basis of this Privacy Statement, please write to us if you need any further information and our colleagues will answer your query.

“Paprika Hotel Kft.” shall keep any and all personal data confidential and shall apply any and all safety, technical and organisational measures in order to guarantee the confidentiality of such data. “Paprika Hotel Kft.” provides its data processing principles hereinunder, and describes the requirements formulated and observed by “Paprika Hotel Kft.” as data controller. Our data processing principles are in accordance with the valid and binding laws governing data protection, and in particular with the following acts:

- Act CLV of 1997 on Consumer Protection (the „Consumer Protection Act”);
- Act XIX of 1998 on Criminal Proceedings (the „Criminal Proceedings Act”);
- Act C of 2000 on Accounting (the „Accounting Act”);
- Act CVIII of 2001 on Certain Aspects of Electronic Commerce Services and Information Society Services (the „E-commerce Act”);
- Act C of 2003 on Electronic Communications as valid and effective from time to time;
- Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (the „Commercial Advertising Act”);
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (the "Privacy Act");
- Act V of 2013 on the Civil Code (the „New Civil Code”).

2. DEFINITIONS

Data subject: shall mean any natural person directly or indirectly identifiable by reference to specific personal data;

Personal data shall mean data relating to the data subject, in particular by reference to the name and identification number of the data subject or one or more factors specific to his/her physical, physiological, mental, economic, cultural or social identity as well as conclusions drawn from the data in regard to the data subject;

The data subject's consent shall mean any freely and expressly given specific and informed indication of the will of the data subject by which he/she expresses his/her agreement to personal data relating to him/her being processed fully or to the extent of specific operations;

The data subject's objection shall mean a declaration made by the data subject objecting to the processing of his/her personal data and requesting the termination of data processing, as well as the deletion of the data processed;

Data controller shall mean any natural or legal person, or organisation without legal personality which alone or jointly with others determines the purposes and means of the processing of data; makes and executes decisions concerning data processing (including the means used) or have it executed by a data processor;

Data management shall mean any operation or the totality of operations performed on the data, irrespective of the procedure applied; in particular, collecting, recording, registering, classifying, storing, modifying, using, querying, transferring, disclosing, synchronising or connecting, blocking, deleting and destructing the data, as well as preventing their further use, taking photos, making audio or visual recordings, as well as registering physical characteristics suitable for personal identification (such as fingerprints or palm prints, DNA samples, iris scans);

Data transfer shall mean ensuring access to the data for a third party;

Disclosure shall mean ensuring open access to the data;

Data deletion shall mean making data unrecognisable in a way that it can never again be restored;

Data tagging shall mean marking data with a special ID tag to differentiate it;

Data blocking shall mean marking data with a special ID tag to indefinitely or definitely restrict its further processing;

Data destruction shall mean complete physical destruction of the data carrier recording the data;

Data processing shall mean performing technical tasks in connection with data processing operations, irrespective of the method and means used for executing the operations, as well as the place of execution, provided that the technical task is performed on the data;

Data processor shall mean any natural or legal person or organisation without legal personality processing the data on the grounds of a contract, including contracts concluded pursuant to legislative provisions;

Third party shall be any natural or legal person, or organisation without legal personality other than the data subject, the data controller or the data processor;

Third country shall be any State that is not an EEA State.

Binding corporate rules (BCR) shall mean internal data protection rules adopted by a data controller or a group of data controllers operating in multiple countries, at least in one EEA Member State, and approved by the National Authority for Data Protection and Freedom of Information (hereinafter referred to as Authority) binding upon the data controller or group of data controllers that, in case of a data transfer to third countries, ensures the protection of these data by unilateral commitment of the respective controller or group of controllers.

Privacy incident shall mean the unlawful processing or process of personal data, in particular the illegitimate access, alteration, transfer, disclosure, deletion or destruction as well as the accidental destruction or damage to said data.

3. THE SCOPE OF PERSONAL DATA; THE PURPOSE, LEGAL TITLE AND DURATION OF DATA MANAGEMENT

Any data in connection with the home page of „Paprika Hotel Kft.” available at www.paprikapanzio.hu are managed on the basis of voluntary consent. In certain cases, however, the management, storage and forwarding of certain groups of the provided data are rendered mandatory by the applicable laws, and we shall notify our clientele accordingly, in a separate notice, when such events occur. We hereby advise our clients who provide „Paprika Hotel Kft.” any data other than their own that it is the obligation of the data provider to obtain the consent and approval of the data subject concerned.

The data shall be processed by the following data processor appointed for the purpose by the Data

Controller:

- interword kft.
8200 Veszprém, Óváros tér 2.
Tax Code No. 12870305-2-19

The purpose of such data processing is to provide hosting services necessary for the operation of the website www.paprikapanzio.hu.

The Data Controller reserves the right to involve any additional data processors in the data management in the future; the Data Controller shall notify its clientele by amending and modifying this Privacy Statement accordingly. In the absence of any express authorisation by the applicable laws to such effect, the Data Controller shall make available and transfer any data allowing identification of the data provider to any third party whatsoever only with the express authorisation of the user (data provider) concerned.

4. CUSTOMER SERVICE

Customer service, both by e-mail and by telephone, shall be provided by „Paprika Hotel Kft.”.

5. DATA MANAGEMENT IN CONNECTION WITH ONLINE RESERVATIONS AND ONLINE REQUESTS FOR PRICE QUOTE

Purpose of the data management: management of online reservations and communication with the customer

Legal basis of the data management: consent of the data subject; Act CXII of 2011 on Informational Self-Determination and Freedom of Information; Section 13/A of Act CVIII of 2001 on Certain Aspects of Electronic Commerce Services and Information Society Services; Section 169(2) of Act C of 2000 on Accounting.

Scope of the managed data: surname, given name(s), company name, e-mail address, telephone number, fax number, mailing address.

Duration of the data management: the Data Controller shall manage the data provided during the online price quoting process as long as the quoting process with the concerned party (data subject) is not concluded, or the cooperation agreement entered into as a result of such process does not expire.

During the data management described in this Section, the data provided by the concerned party (data subject) are managed and processed in a closed and sealed system, and such data shall not be forwarded to any third party whatsoever.

By using the web page www.paprikapanzio.hu and by providing their data, the concerned parties (data subjects) grant their voluntary, explicit and specific consent thereto that their data be managed for the purposes set out in this Privacy Statement, for the duration set out in this Section.

The consent of the concerned party (data subject) may be withdrawn in any stage of the data management process; the specific rules thereof are set out in Section 11 of this Privacy Statement.

6. DATA MANAGEMENT RELATIVE TO NEWSLETTERS

Purpose of the data management: sending newsletters for subscribers

Legal basis of the data management: consent of the data subject; Act CXII of 2011 on Informational Self-Determination and Freedom of Information; Section 13/A of Act CVIII of 2001 on Certain Aspects of Electronic Commerce Services and Information Society Services; Section 6(5) of Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities.

Scope of the managed data: surname, given name(s), e-mail address

Duration of the data management: deletion upon request from the concerned party (data subject)

Our data management registration number: **NAIH-126693/2017**

During the data management described in this Section, the data provided by the concerned party (data subject) are managed and processed in a closed and sealed system, and such data shall not be forwarded to any third party whatsoever.

By using the web page www.paprikapanzio.hu and by providing their data, the concerned parties (data subjects) grant their voluntary, explicit and specific consent thereto that their data be managed for the purposes set out in this Privacy Statement, for the duration set out in this Section. The consent of the concerned party (data subject) may be withdrawn in any stage of the data management process; the specific rules thereof are set out in Section 11 of this Privacy Statement.

7. WEB ANALYTICS AND ADSERVERS

„Paprika Hotel Kft.” uses Google Analytics, a web analysis service of the Google Inc. Google Analytics uses so-called “cookies”, text files, which enable an analysis of the use of the website. The information generated by the cookie (including the IP address of the User) is usually transmitted to a Google server in the USA and stored there. Google Inc. may make available any such collected data to third parties if required by law or such third parties process the information by appointment of Google Inc. Within the framework of AdWords remarketing, Google Inc. places tracing cookies on the computer hard disks of the Users that monitor the online activities of visitors and on the basis whereof Google Inc. offers them advertisement on other web pages based on their behaviour and interest. The tracing cookie enables Google Inc. to identify the visitors of a home page on other websites as well.

The Privacy Policy of Google Inc. is available here: www.google.hu/intl/hu/policies/privacy

Information regarding the data management by Google Inc., the deactivation of cookies and the customisation of advertisements: www.google.com/intl/hu/policies/privacy/ads

8. MISCELLANEOUS

We advise our customers that the courts of law, the public prosecutor’s office, the investigating authorities, the authority dealing with administrative offences, the administrative authorities, the Commissioner for Data Protection, and other organisations authorised by law may contact the Data Controller for information, provision and transfer of data and also the provision and transfer of documents.

In the event that the authority has indicated the exact purpose and the scope of data, „Paprika Hotel Kft.” shall disclose any personal data to the authorities to the extent it is essential and strictly necessary for the achievement of the purposes indicated by the authority in the respective request.

9. STORAGE OF PERSONAL DATA, SAFETY OF DATA MANAGEMENT

„Paprika Hotel Kft.” shall select and operate the IT equipment used for the management of personal data in such manner that such managed data

- a) be accessible by the authorised parties (availability);
- b) its authenticity and verifiability are guaranteed (authenticity of data management);
- c) its consistency can be proven (data integrity);
- d) be protected against any unauthorised access (confidentiality of data).

„Paprika Hotel Kft.” shall provide for the protection of data management safety by adopting such technical, managing and organisational measures that provide an adequate level of protection against the risks arising in connection with data management.

In data management, „Paprika Hotel Kft.” shall protect and preserve

- a) confidentiality: information shall be protected so that access shall be granted to authorised parties only;
- b) integrity: the exactness and completeness of the information and the processing method shall be protected;

c) availability: when the authorised user needs it, the data controller shall guarantee effective access to the information required and shall provide that the equipment needed for such access be available as well.

The IT systems of „Paprika Hotel Kft.” and its partners are protected against computer fraud, espionage, sabotage, vandalism, fire and flood, computer viruses, hacking and denial of service attacks. The operators apply both server and software level protection measures in order to guarantee safety.

We wish to advise all parties concerned that electronic messages transmitted over the internet are vulnerable, independently from the protocol applied (email, web, ftp etc), against network threats that might result in unlawful and unfair practices, challenged agreements or information disclosure and/or modification. We take all reasonable and necessary measures for ample protection. All systems are monitored to record any security breaches and to provide the respective evidence. System monitoring also enables us to verify the efficiency of the protection measures applied by us.

10. PARTICULARS AND CONTACT ADDRESS OF THE DATA CONTROLLER

Name: Paprika Hotel Kft.

Registered office: 9222 Hegyeshalom, Miklóshalmi utca 1. (Hungary)

Email: info@paprikahotel.hu

Telephone: +36 96 568 410

Duly represented by: Mr Dániel Takács

Tax Code No. 25833553-2-08

Trade Register No. 08-09-028695

Court of registration: “Győri Törvényszék Cégbírósága” (the Court of Registration of the Tribunal of Győr)

Our data management registration number: **NAIH-126693/2017**

11. LEGAL REMEDIES

The concerned party (data subject) has the right to require information regarding the management of his/her personal data, may require that his/her personal data be corrected, and – with the exception of certain data management cases regulated by law – may also require that his/her personal data be deleted, in the manner indicated for the collection of his/her personal data and/or through the customer service department of the data controller.

Upon request from the concerned party (data subject), "Paprika Hotel Kft." as data controller shall provide information regarding the data of the concerned party (data subject) that are managed by the data controller and/or such data processed by the data processor appointed for the purpose by the data controller, the purpose, legal basis and duration of the data management, the name and address (registered office) of the data processor and the activities of the data processor in connection with the management of such data; furthermore that said data have been or will be made available to whom and for what purpose. Within the shortest term possible following submission of the respective request, however not longer than within 25 days, the data controller shall provide the information in writing, in a reasonable manner understandable by the general public. The provision of such information is free of charge, provided the party requesting such information has not yet submitted any request for information to the data controller in the same field and in the current calendar year. In any other cases "Paprika Hotel Kft." will impose a charge. "Paprika Hotel Kft." shall delete the personal data if the management of such data is in violation of the applicable laws; the concerned party (data subject) requests such deletion; the purpose of such data management or the deadline determined by law for data storage has expired; or a court of law or the Commissioner for Data Protection has ordered that such data be deleted.

The data subject shall have the right to object to the processing of data relating to him/her:

- a) if processing or disclosure is carried out solely for the purpose of discharging the controller's legal obligation or for enforcing the rights and legitimate interests of the controller, the recipient or a third party, unless processing is mandatory;
- b) if personal data is used or disclosed for the purposes of direct marketing, public opinion polling or scientific research; and
- c) in all other cases prescribed by law.

In the event of objection, "Paprika Hotel Kft." shall suspend the management of any such data and shall investigate the cause of objection within the shortest possible time within a 15-day time period, adopt a decision as to merits and notify the data subject in writing of its decision. If, according to the findings of the controller, the data subject's objection is justified, the controller shall terminate all data management operations (including data collection and transmission), block the data involved and notify all recipients to whom any of these personal data had previously been transferred concerning the objection and the ensuing measures, upon which these recipients shall also take measures regarding the enforcement of the objection.

If the data subject disagrees with the decision taken by the controller, the data subject shall have the right to apply for remedy at a court of law within thirty days from the date of delivery of the decision.

In the event that the rights of the concerned party (data subject) are violated, the concerned party may apply for remedy at a court of law. The Court of law shall give priority to such request while proceeding.

„Paprika Hotel Kft.” shall be liable for any damage suffered by data subjects as a result of an unlawful processing of their data or as a result of an infringement of the technical requirements of data protection. The data controller shall be exempted from liability if it proves that the damage was the result of *force majeure* beyond the sphere of data management.

No compensation shall be paid by the data controller for the part of damage suffered by the damaged person as a result of his/her intentional or grossly negligent conduct.

Requests for legal remedy and/or complaints may be submitted to „Nemzeti Adatvédelmi és Információszabadság Hatóság” (The Hungarian National Authority for Data Protection and Freedom of Information):

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság (The Hungarian National Authority for Data Protection and Freedom of Information)

Registered office: 1055 Budapest, Falk Miksa utca 9-11. (Hungary)

Telephone: +36 1 391 1400

Fax: +36 1 391 1410

Email: ugyfelszolgalat@naih.hu

In the event that someone is denied access to public information because such information has been classified as national security information, such person may petition that a review procedure be conducted regarding the classification of such information. Such review procedure may be conducted by the data protection authority; however, if the party requesting such public information considers such measure insufficient, then he/she is permitted to initiate a secret control procedure thereafter. Such procedure for secret control may be conducted by the authority as well; the procedure shall be deemed to be initiated *ex officio* also in the event that a review procedure initiated by a private party had been previously conducted relative to the subject matter. The party initiating the review procedure shall be notified of the fact that a secret control procedure has been initiated and also the decision that concludes such proceedings. As a result of such secret control procedure the authority may find that the classification of the information in question as national security information was unlawful, and the authority instructs the subject who previously classified such information as national security information to change the confidentiality level or the period of data protection in accordance with the applicable laws, or obliges such party to cancel such classification. Another possible outcome of such procedure is that the authority finds that the data in question is lawfully classified and protected as national security information. The authority has two months at its disposal to conduct such secret control procedure, and such term may be extended once with a maximum additional duration of thirty days.

DISCLAIMER

Limitation of liability:

1. "Paprika Hotel Kft." shall not be liable for any of the events described hereinunder, regardless of how any of these events has occurred:

- Any data forwarded and/or received through the Internet.
- Any failure in the functioning of the Internet network that prevents the proper and undisturbed functioning of our home page and the reservations.
- Any failure of any communication device in the communication lines.
- Any loss of any letter – regardless whether such letter was dispatched on paper or in electronic format - and any data loss in particular.
- Any inadequate functioning of any software.
- Any consequences of any defect in programming, any extraordinary/abnormal event and/or technical failure.

2. "Paprika Hotel Kft." shall not be liable for any damages in connection with any *force majeure* event and/or any other event beyond its reasonable control.

3. "Paprika Hotel Kft." reserves the right to change and/or update the home page without any prior notice, and/or to temporarily or permanently suspend or terminate the functioning of the home page. The user of the home page acknowledges and agrees that "Paprika Hotel Kft." declines any liability whatsoever for any damages arising out of any modification, updating, suspension and/or cancellation of the home page.

4. Any amendment and/or modification to this Privacy Statement shall become effective and binding when appears online on the website www.paprikapanzio.hu.

Copyright

Any and all information and photograph on the website, furthermore the graphic and technical design of the website constitute the sole and exclusive property of "Paprika Hotel Kft." and are subject to copyright protection (Act LXXVI of 1999 on Copyright).

Any unauthorised use hereof without the permission of the copyright owner shall constitute a violation of copyright and shall result in civil and criminal liability.

Any utilisation of any component of the website shall be subject to the prior written authorisation of "Paprika Hotel Kft.".