

Privacy Information Guide

We place great emphasis on the protection of personal data, which, of course, includes our online booking system as well as our newsletters; that is why we would like to inform you about the data management and processing procedures we use in relation to our services, in our online booking system and with reference to our newsletters. The following sections contain information on what we do in order to protect your data, what types of data we record and for what purposes we record them.

Website Information

The operator of the website: Móra-Invest Kft.

Head office: Millenniumi sétány 4-6., 6782 Mórahalom, Hungary

Postal address: Millenniumi sétány 4-6., 6782 Mórahalom, Hungary

Telephone: +36 30 206 6622

Email: hotel@colosseumhotel.hu

Newsletters

I. Sign-up via the Sign up for Newsletters menu item

In the Sign-up for Newsletters menu item of our homepage, by providing your personal data (surname, first name, email address the newsletters should be sent to and any other data at your own discretion), ticking the relevant square and finally clicking on the Sign-up button, you give your explicit consent to receiving information and advertising newsletters from Móra-Invest Kft. via email (to the email address provided at sign-up) and also via regular mail (as long as a postal address has also been provided). At the same time, you also expressly agree that, in accordance with the contents of the present Privacy Information Guide, Móra-Invest Kft. may manage and process your personal data (given during the newsletter sign-up) for advertising and market research purposes. Furthermore, by ticking the relevant square on the newsletter sign-up datasheet, you expressly agree that Móra-Invest Kft. may forward the same data to Accent Hotel Solutions Kft. (registered at Visegrádi u. 31, 1132 Budapest, Hungary) and that the latter company can also manage these data for advertising and market research purposes. You also agree to receiving newsletters from Accent Hotel Solutions Kft.

II. Sign-up during online booking

We wish to inform you that by ticking the square authorizing newsletter sending in our online booking system, you give your explicit consent to receiving information and advertising newsletters from Móra-Invest Kft. via email (to the email address provided during online booking) and also via

regular mail (as long as a postal address has also been provided). On condition that you expressly agree by ticking the relevant square on our booking surface, Móra-Invest Kft. is entitled to forward your data provided during online booking to Accent Hotel Solutions Kft. Furthermore, Accent Hotel Solutions Kft. will also become entitled to manage these data for advertising and market research purposes and to send newsletters to you.

III. Sign-up personally or via phone

By ticking the relevant square on the registration form filled in at the reception of the Colosseum Hotel, or by the confirmation in your response sent to our email which you had received from us for your previous telephone inquiry, you give your explicit consent to receiving information and advertising newsletters from Móra-Invest Kft. via email (to the email address provided on the registration form or during our telephone conversation) and also via regular mail (as long as a postal address has also been provided). At the same time, you also expressly agree that, in accordance with the contents of the present Privacy Information Guide, Móra-Invest Kft. may manage and process your personal data (given during the newsletter sign-up) for advertising and market research purposes. By ticking the relevant square on the registration form filled in at the reception of the Colosseum Hotel, or by the confirmation in your response sent to our email which you had received from us for your previous telephone inquiry, you expressly agree that Móra-Invest Kft. may forward your data (provided on the registration form or during our telephone conversation) to Accent Hotel Solutions Kft. and that the latter company can also manage these data for advertising and market research purposes. You also agree to receiving newsletters from Accent Hotel Solutions Kft. Please note that you are entitled to disclaim your declaration of consent regarding the reception of newsletters at any time without any justification Your disclaimer can be sent to the releasers of the newsletters (Móra-Invest Kft. and Accent Hotel Solutions Kft.) by using the disclaimer link found at the bottom of the electronic newsletters or by post or email to one of the availabilities indicated in the present Information Guide.

Privacy

By signing up to our newsletters, sending your online booking or filling in the hotel registration form, you agree that, in accordance with the contents of the present Privacy Information Guide, we may manage and process the personal data provided by you in order to perform the service(s) you require. We commit ourselves to treat the personal data of the individuals using our services and booking system or signing up to our newsletters as confidential, and we also take responsibility to comply with the current privacy laws completely. We are bound to observe the provisions of Law CXII of 2011 on

the right to informational self-determination and freedom of information (“Information Law”) and those of any other relevant regulations in all respects. We apply the concepts related to personal data in accordance with the provisions of the Information Law. Moreover, in case of changes occurring in the applicable legal provisions or in jurisprudence, we reserve the right to modify the information stated in the present Privacy Information Guide according to these changes without prior notice. From the different versions of this Privacy Information Guide, the one currently published on the website www.colosseumhotel.hu shall be considered operative. The personal data gathered and recorded in relation to the use of the online booking system, the newsletters and the services offered by Móra-Invest Kft. are managed by Móra-Invest Kft. The data management activity has been registered under number NAIH-81585/2014 in the Data Protection Register supervised by the National Data Protection and Freedom of Information Authority. In case of making online reservations and signing up to our newsletters, we manage your personal data for market research and advertising purposes, thus especially for the purpose to send you, as a person having voluntarily signed up to our newsletters, advertising and information newsletters. We manage personal data solely by the consent of the concerned or in order to comply with our legal obligations. Móra-Invest Kft. makes use of your personal data exclusively in accordance with and within the frames of your data management consent while observing the provisions of applicable legislation. Our data management complies with the above objective in all of its stages. Each and every item of personal data you provide us with, or the ones we manage on the grounds of the provisions of the applicable legislation are recorded, managed and processed so that the services you have opted for could be performed. We only ask for data necessary for the performance of these services. In this respect, we undertake to fully comply with the following data protection directives. We collect and manage personal data fairly and lawfully. We collect personal data only for definite, lawful purposes, and we do not use them for purposes other than those. The way we manage and store data enables that the concerned can only be identified for the time needed for the purpose of the data management. We solely manage data strictly indispensable for the purpose of data management. The data we manage are exact, complete, and if necessary, timed, that is storage of data does not take longer than it is needful for the achievement of their intended use. During the management of data, the individuals concerned are fully provided with the rights laid down in the Information Law and in any other applicable legislation. We take those technical and organizational measures and create those procedures which are necessary for the prevention of the unauthorized and unlawful use or the loss, damage and destruction of personal data. By giving your consent to data management, you approve of the management, storage and procession of your personal data in the above mentioned way. We provide access to stored data for a third party solely in a way it is stated in the present Guide. We

forward your personal data to a third party exclusively for the performance of our legal obligations, or with your explicit consent while observing all legal provisions, and only if third party have also committed itself towards us that it shall observe the current data protection provisions. Please be aware that you are held responsible for the authenticity of your personal data; we accept no liability for any damage caused by incorrect data. You are free to request information on the management of your personal data from our company at any time. Our availabilities are indicated in the Website Information above. On your demand, we provide detailed information on your data we manage, on the purpose, legal base and duration of data management and also on our activity related to it. You may also ask for the correction, the deletion or the blocking of your personal data. In addition, you may also object to the management of your personal data in accordance with the applicable legal provisions. As long as you do not agree with our decision made upon your objection, you may turn to court within 15 days of the notification. We inform you that we delete your personal data from our system upon your request. The request for deleting data can either be sent by post or email to Móra-Invest Kft.'s availabilities indicated in the above Website Information. Please note that for the data management and newsletter sending by Accent Hotel Solutions Kft., their own privacy information guide applies.

Information about the electronic surveillance systems operated by Móra-Invest Kft. on the premises of the Colosseum Hotel

Dear Guests,

1. We inform you hereby that in our Colosseum Hotel (located at Millenniumi sétány 4-6, 6782 Mórahalom, Hungary), Móra-Invest Kft. (registered at Millenniumi sétány 4-6, 6782 Mórahalom, Hungary) operates electronic surveillance systems, which are handled by the employees of the company.

2. We also inform you that for the rules of the use of electronic surveillance systems, the provisions of Law CXXXIII of 2005 on the rules for the use of electronic surveillance of private security and private investigation activities ("Law on Private Security Services") and the provisions of Law CXII of 2011 on the right to informational self-determination and freedom of information ("Information Law") apply. Accordingly, the operation of our electronic surveillance systems (as it is stated in §30 (2) of the Law on Private Security Services) happens on the grounds of explicit consent in a way elaborated below, and serves the purpose of protecting human life, physical wellbeing and property as well as the prevention and detection of infringements and

accidents. It also serves the purposes of catching an offender committing a criminal act and providing evidence for infringements. As the operation of electronic surveillance systems involves data management as well, this kind of activity is subject to supervision by the National Data Protection and Freedom of Information Authority.

3. We would like to draw your attention to the fact that entering a room monitored by cameras in knowledge of the present Guide is automatically considered to be an explicit consent to data management.

4. The registration number of the data management by Móra-Invest Kft. is NAIH-81390/2014.

5. The managed data involves the guests' and employees' facial images seen on the security footage as well as some of their other personal data.

6. The electronic surveillance systems operate seven days a week and 24 hours a day.

7. Only authorized individuals are allowed to view the security footage stored in the camera surveillance and recording systems operated by Móra-Invest Kft., and they may solely do so for the proof of infringements against human life, physical wellbeing and properties and for the investigation of other events and accidents concerning human life and physical wellbeing.

8. Móra-Invest Kft. records the views of the security footage, the name of the person performing them, the reason for and the time of data inspection in minutes. For safe data management, the protection of the data stored on the servers enlisted below is ensured by a personal username and password, which can identify who and when had access to the data.

9. Data can exclusively be forwarded to the authorities and courts carrying out the procedures ongoing with respect to an illegal practice or misconduct. The transmitted data may involve footage by the camera systems containing relevant information and the name(s) of the person/people possibly appearing on the footage.

10. We inform you that the ones whose rights or legitimate interests are concerned by the recording of the images may ask for a copy of the footage

taken of them by the electronic surveillance systems. They may also demand the deletion of the footage in accordance with the applicable legal provisions. Furthermore, the ones whose rights or legitimate interests are concerned by the recording of the images, having justified their rights or legitimate interests, may request Móra-Invest Kft. not to destroy or delete the data within 15 workdays of the recording of the images.

We also inform you that you are free to request information on the management of your personal data from Móra-Invest Kft. at any time. You may also ask for the correction or the blocking of your personal data in accordance with the applicable legal provisions. In addition, you may also object to the management of your personal data.

Please note that in case of the violation of your rights, you may turn to court in the context of the provisions of the applicable legislation. Furthermore, anybody is allowed to initiate an investigation by reporting to the National Data Protection and Freedom of Information Authority that an impairment of a right with respect to the management of personal data has taken place or there is an imminent risk of it.

11. The following cameras operate on the premises of the Colosseum Hotel:

Car park: the whole area of the closed-off car park is monitored by 9 cameras, which are mounted on lighting columns.

The security footage is stored on the server placed in the server room for 15 workdays. The people eligible to review it in case of the infringements and events detailed in point 7 are the Managing Director of Móra-Invest Kft., the Hotel Manager and the current Manager on Duty of the Hotel.

Wellness: 2 cameras monitor the pools and their immediate surroundings (relaxation area) in the hotel's wellness area. Further 2 cameras record the surroundings of the outdoor adventure and training pools. The aim of the surveillance is to protect human life and physical wellbeing, to minimize the chances of accidents in the wellness area and to enable hotel staff to react to possible accidents occurring there as soon as possible. A further reason for installing cameras in the wellness area is the property protection of the greater value items increasingly brought here and left unattended by our guests. The camera images are continuously checked by the pool attendant; the security footage is stored for 15 days on the server placed in the pool attendants' room.

In case of the infringements and events detailed in point 7, the people entitled to review the security footage are the Managing Director of Móra-Invest Kft and the Manager of the Hotel or in case the latter one is prevented from attending, the current manager in charge.

The images recorded by the cameras:

1. Pools
2. Relaxation area with exits
3. Adventure and training pool
4. The areas outside the footbaths of the adventure and training pools, the towel rack

Public spaces: the outside/inside entrances of the hotel and its inner spaces are monitored by 16 cameras. The aim of the surveillance is primarily the protection of the hotel's assets, equipment and supplies and also that of the properties the guests bring with themselves. In this respect, the surveillance of the hotel's entrances, access paths, reception and depositories is particularly justified. Another purpose of the surveillance is to prevent accidents endangering human life and physical wellbeing, or to reconstruct their events in case they might occur. The camera images are occasionally checked by our colleague on duty at the reception; the security footage is stored for 15 days on the server placed in the server room.

In case of the infringements and events detailed in point 7, the people entitled to review the security footage are the Managing Director of Móra-Invest Kft. and the Manager of the Hotel or in case the latter one is prevented from attending, the current manager in charge.

The location of the cameras:

1. Main entrance
2. Service entrance path
3. Lobby bar
4. Fire escape, ground floor exit
5. Wellness entrance
6. Ground floor elevators
7. Reception
8. Lobby and main entrance

9. Kitchen passageway
10. Service entrance
11. Ground floor rooms' corridor
12. Beauty and hair saloons' hallway
- 13-19. 1st-floor passageway
- 20-26. 2nd-floor passageway
- 27-31. 3rd-floor passageway
- 32-33: 4th-floor rooms' corridor