



PRIVACY POLICY

We consider protection of personal information of high importance. Naturally, your personal data are also protected when you are using our online reservation system or subscribing to our newsletter. We'd like to inform you about the operations we carry out for holding and processing personal data in connection with providing our services in our online reservation system. In this document we advise you what we do for the protection of your personal data, what data we collect and for what purpose we collect them.

Impressum (Contact details)

This website is operated by Accent Hotel Solutions Kft.

Registered office: 1132 Budapest, Visegrádi u. 31.

Postal address: 1132 Budapest, Visegrádi u. 31.

Telephone: +36 1 780 45 93

E-mail: info@accenthotelmanagement.com

Data protection

By sending your online reservation or filling in the hotel check-in form you give us your consent to processing your personal data, provided by you, in compliance with the principles and rules set out in this privacy policy for the performance of the services requested by you.

We are committed to keep the personal information of the persons using our services and users of our online reservation system in confidence, and we undertake to fully comply with current data protection legislation, such as the provisions of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information ("Info Act") and other relevant laws. We use the terms related to personal data in this document in accordance with the provisions of the Info Act.

On the other hand, we reserve the right to amend this privacy policy without previous notice from time to time in case there are changes in the relevant legal regulations and legal practice. Out of the various versions of this Privacy Policy the one published on our website, www.gotthardhotel.hu should be considered valid.

The controller of the personal data collected and recorded in connection with the use of the online reservation system and the services provided by GRAL EUROPE Kft. is GRAL EUROPE Kft. The data processing has been registered under number NAIH-100286/2016 in the Data Protection Register kept by the Hungarian National Authority for Data Protection and Freedom of Information.

We process your personal data for fulfilling online orders as well as for market research and advertising purposes, and so that, in particular, we will be able to send information and promotional materials for you as a person who has voluntarily subscribed to our newsletter.

We process personal data only based on the consent of the data subject or in order to comply with our statutory obligations. GRAL EUROPE Kft. will process your personal data in compliance with the consent granted by you to the data processing, within the scope of your consent and in accordance

with the provisions of the relevant laws. The data processing satisfies these requirements in its each stage.

All the personal data you have made available for us of your free will and processed by us according to the relevant legal regulations will be recorded, processed and held for the performance of the services requested by you. Please do not give other data than those required for the performance of such services.

In this respect we undertake to fully comply with the following privacy rules:

- We collect and process personal data lawfully and fairly.
- We collect personal data only for specific and legitimate purposes, and we will not use them in deviation from such purposes.
- The personal data are processed and stored in a way to permit identification of the data subject for no longer than it is necessary for the purposes for which the data were recorded.
- We process only personal data that are absolutely necessary to attain the purpose of processing. The personal data processed by us are accurate, complete and up to date, if necessary.
- The personal data are stored for no longer than is necessary to achieve the purposes for which the data were recorded.
- During the processing operation we provide the rights of the data subjects specified in the Info Act and in other relevant laws.
- We implement the technical and organizational measures and enforce the procedural rules required to prevent any unauthorized or unlawful use, loss, damage or destruction of personal data.

By granting your consent to data processing you will also assent to holding, storing and processing your personal data as set out above.

We allow access to stored personal data for third party only in the manner specified in this policy. We transmit your personal data only for compliance with our statutory obligations or by your explicit consent, in compliance with legal regulations and provided that such third party also undertakes to abide by privacy regulations against us.

Please note that you will be liable for the authenticity of your personal data; we refuse to assume liability for any damage arising from false personal data.

You may request for information about the processing of your personal data at any time. Contact details of our company are provided in the impressum. At your request we will inform you about the personal data processed by us, purpose, legal grounds and duration of the processing as well as about our activity related to the processing. You can also request for rectification, erasure or blocking of your personal data. Apart from this you have the right to object to the processing of your personal data in compliance with applicable laws. If you disagree with our decision concerning your objection, you may seek remedy at the court within 15 days following the delivery of the decision.

We also advise you that upon you request we will erase your personal data stored in our system. The request for the data can be sent either via e-mail or by post to any of the addresses indicated in the

impressum for GRAL EUROPE Kft.

We inform you that concerning the data processing and sending newsletters by Accent Hotel Solutions Kft. the privacy policy of Accent Hotel Solutions Kft. is governing.

Information on the use of electronic surveillance system:

Dear Guests,

We hereby inform you that GRAL EUROPE Kft. (1137 Budapest Pozsonyi u. 30.) operates an electronic surveillance system (outdoor surveillance camera system) in the hotel operating under name **GOTTHARD THERME HOTEL & CONFERENCE**, located at 9970 Szentgotthárd, Füzési u. 3/b.

We advise you that the rules of making video and audio recordings, their processing and retention are provided for by Act CXXXIII of 2005 on Security Services and the Activities of Private Investigators (Security Service Act) and Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (Info Act). According to section 30 (2) of the Security Service Act the use of the electronic surveillance system operated, as described below, is based on the specific consent of the data subject with the aim to protect the human life, physical integrity and property, to prevent or detect offences or accidents, to surprise the perpetrators and to prove offences. Please note that entering the location monitored with cameras after reading this policy is considered as specific consent to data processing.

Scope of the processed data: guests' face, voice and other personal data perceptible on the video and audio recordings.

The registration number of data processing by GRAL EUROPE Kft: **100286/2016**.

The electronic surveillance system is operated 24 hours on each day of the week; the recordings are stored by a server on the premises of GRAL EUROPE Kft.

For the secure processing of personal data the protection of the data stored on the server is ensured by unique user name and password, based on these it can be determined which authorised person accessed the data and when.

The hotel's managing director and director of operations or – in case they are unavailable – the hotel's current manager in charge are entitled to view the camera recordings.

The recordings of the camera surveillance and recording system operated by GRAL EUROPE Kft. can be accessed only by authorised persons exclusively in order to prove offenses against human life, to protect human life, physical integrity and property, to identify the offender and to reveal other events or accidents.

GRAL EUROPE Kft. draws up minutes on the inspections of the recordings, specifying the name of the person and the reason and time of the data access.

Personal data may be transmitted only in the case of proceedings pending with regard to unlawful act or violation of obligation to authorities or courts conducting them. The scope of the transmitted personal data may cover recordings which contain relevant information recorded by the surveillance camera system as well as possibly the name of the persons visible on the recordings.

We inform you that the data subjects whose right is affected by the video and audio recordings

may request for a copy of the recordings made of them by the electronic surveillance system as well as for the erasure of the recordings in accordance with the relevant legal regulations. In addition, the data subject whose right or lawful interest is affected by the video and audio recordings may request GRAL EUROPE Kft. within 3 working days of the recording not to destruct or erase the personal data.

You may request for information about the processing of your personal data from GRAL EUROPE Kft. at any time. You may also request for the rectification or blocking of your personal data in compliance with the relevant legislation. Apart from this, you may object to the processing of your personal data.

We advise you that in the case of violation of your rights you may seek remedy at the court in accordance with the relevant laws or you may contact the National Authority for Data Protection and Freedom of Information to initiate inspection with reference to the actual or directly threatening grievance in relation to the processing of your personal data.

Areas under surveillance:

- Camera 1: Entrance from direction of the main road (outdoor)
- Camera 2: Receipt of goods, staff entrance (outdoor)
- Camera 3: Roundabout (outdoor)
- Camera 4: Main entrance (outdoor)
- Camera 5: Back terrace (outdoor)
- Camera 6: Back courtyard (outdoor)
- Camera 7: Back parking lot entrance (outdoor)
- Camera 8: Back parking lot – side from direction of the garages – (outdoor)
- Camera 9: Back entrance - terrace (outdoor)
- Camera 10: Parking lot – side from direction of the park (outdoor)
- Camera 11: Staff entrance (indoor)
- Camera 12: Kitchen lobby (indoor)
- Camera 13: Kitchen entrance (indoor)
- Camera 14: Storeroom of beverages (indoor)
- Camera 15: Lobby bar (indoor)
- Camera 16: Reception (indoor)
- Camera 17: Entrance to the suite of offices – from direction of luggage storage (indoor)
- Camera 18: Main entrance lobby (indoor)
- Camera 19: Lobby bar – terrace door (indoor)
- Camera 20: -1st floor workshop (indoor)
- Camera 21: -1st floor bath corridor (indoor)
- Camera 22: -1st floor furniture storeroom hallway (indoor)
- Camera 23: -1st floor conference bar (indoor)
- Camera 24: -1st floor Administration hallway – server room (indoor)
- Camera 25: -1st floor lift lobby (indoor)

Szentgotthárd, 13 June 2016