

GDPR Data Protection Policy Notice

Bewital Bt. (hereinafter: “Oázis a Klastromhoz Wellness Guesthouse”), as the operator of the webpage domain accessible at www.balatonivendeghaz.hu (hereinafter: “Webpage”) hereby make public the rules, data protection and data processing principles, as well as the data processing notice related to the webpage and the services connected to that webpage.

Upon initiating usage of the webpage the user visiting the webpage (hereinafter “User”) accept all the conditions stated in this notice. For this reason, we ask that you read all the conditions in the Data Protection Policy Notice (“Notice”) carefully before using the webpage.

1. Data Controller Details:

The data controller is the operator of the Webpage Bewital Bt. (hereinafter: “Controller”).

Headquarters: 9228 Halászi, Damjanich u. 28.

Representative: Molnár Zsolt József (Guest House Manager)

E-mail address: recepicio@balatonivendeghaz.hu

Data storage is carried out by the Data Controller. The Data Controller reserves the right to add further data processes to the data processing of which the User will be informed by the modification of this Notice

The User can provide information and data about themselves in two possible ways on the Webpage:

- On the balatonivendeghaz.hu webpage, when requesting information on the services of or when requesting the actual services of Oázis a Klastromhoz Wellnes Guesthouse, and only personal data given for this purpose (see part I).
- The information provided to the Controller in relation to the usage of the Webpage based on webpage visit and usage related data (see part II).

2. Rules of Data Processing

The current data processing notice is in effect as of 22 May 2018 until it is withdrawn. The current rules and regulations comply with the explanation of concepts determined in GDPR article 4 as well as in certain points with the regulation in effect as of 25 May 2018, Infotv 3.§, on the basis of which:

Personal data: any information related to identified or identifiable natural persons (“subject”); a natural person is deemed to be identifiable who either directly or through an agent is identifiable based on data factors in particular but not limited to name, number, details of location, online ID, bodily, physical, genetic, spiritual, economic, cultural or social identification.

Consent: the will of the subject is voluntary, concrete and based on appropriate information and is a clear statement that the subject with their declaration or confirmation as an unmistakable pronouncement that they give their consent for their personal data to be managed;

Controller: this is the natural or legal person, public body, agency or any other body who define their data processing goals and tools either individually or together with others. If the data processing goals and tools are determined by the EU or member states law, the controller or the particular viewpoints related to the appointed controller are determined by the EU or member states law;

Data Processing: is any operation or the sum of operations, either automatic or non-automatic, performed on data or data storage centre, including collection, data entry, systematization, articulation, storage, transformation, alteration, inquiry, viewing, usage, notification, forwarding, distribution or any other method which involves accessing the data, co-ordination or harmonization, deleting, restricting or destruction

Data Processor: is the natural or legal person public body agency or any other body which processes data in the name of the Controller;

Data Protection Incident: is the breach of security by which data forwarded, stored or handled in other ways is accidentally or illegally destroyed, lost, changed, disclosed without approval, or anything resulting in the unauthorized access to data;

Personal data processing must be carried out in a legal, respectful, and transparent method for all stakeholders.

The controller shall make this notice permanently accessible on the webpage. Acceptance of the Notice (by checking the appropriate checkbox) confirms that it has been acknowledged and is classified as authorization for data processing. Thus, data processing is only possible if the subject gives a clear authorization, for example in written form – including those performed electronically – that they authorize voluntarily, concretely, clearly and in an informed way that their data as a natural person can be managed.

Personal data collected by the Controller can only occur for determined, clear and legal goals and that data which does not fit into these goals and can only be stored for that time which is necessary to reach the goals of data processing.

Employees involved in data processing at the Controller or those participating in data processing as a subcontractor to the Controller must treat the personal data as a strict business secret.

Employees of the Controller must ensure during their work that no unauthorized people can view the personal data and furthermore that data storage is carried out in such a way that no unauthorized person could access, destroy, change, or copy the data.

If the subject gains knowledge that the personal data handled by the Controller is incorrect, lacking, or out of date, he must correct the data or have the data corrected by the person responsible for data entry.

I. Data processing realised during usage of the Controller's Webpage, Processing of data expressly provided by the User

1) What kind of personal data is requested?

a) Upon opening the webpage, on the left column is the “Sign up for our Newsletter” box. Requesting this newsletter requires the following persona data to be provided:

- Full name
- Email address

The subject may only send the data if they accept the GDPR notice by checking the appropriate box. Without this acceptance, it is not possible to complete the process of signing up.

b) Apartment booking procedure.

The following data is necessary to be provided when booking the apartments or services related to the apartment:

- Full Name
- Company Name
- Telephone Number
- E-mail address
- Address (Country, Post Code, City/County, Street, House Number)

It is necessary to give an email address for online correspondence. The telephone number is necessary for prompt contact. Billing data (Address, Company name in certain cases) is necessary to produce the invoice.

2) Goals and duration of data processing.

The Controller uses the data in order to provide the services listed on the Webpage, in particular for the following reasons:

- Point 1./a): publicising any points of interest related to the apartments presented on the Webpage; maintaining contact through the newsletter.
- Point 1./b): In the interests of booking the accommodation, the Guest can only send firm bookings to Oázis a Klastromhoz Wellness Guesthouse if they provide their own personal data (name, email address, telephone number, invoicing address) and indicate how many guests and for what dates he requires the booking.

3) Data Processing related to the Newsletter and Direct Marketing

In the interests of providing the most wide ranging demands of clients, the Controller may send to the subject parties direct offers as well as informal recommendation emails and newsletters based on their direct clear and expressed approval of this. If the subject signs up for the newsletter on the webpage, they must accept the GDPR rules by checking the

appropriate box. The controller assures the possibility for the subject to opt out of these emails at any point.

The Controller gives Facebook the email addresses of those people who have requested direct marketing activities. Thus, Facebook is categorised as a data processor of the Controller. The goal of giving the email address to Facebook is to send targeted adverts via Facebook.

The settings for changing the authorization of Facebook adverts can be reached via the following link.

https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen

If the subject signs up for the newsletter, the Controller can send them targeted adverts in the process of direct marketing activities. If the subject does not approve of this he can state his complaint at the email address provided by the Controller

Data Processing Goal: informing the subject parties about the Controller's most important news and direct marketing.

Scope of Data Managed: Subject name, email address, address, telephone number in the case of booking or price quotes

Legal Basis of Data Processing: *Based on the subject authorization in GDPR 6. article (1) par. a) point*

Data Storage Deadline: Until the newsletter service exists unless the subject requests their data to be deleted (opt out of newsletter) in which case the deletion should be immediate.

Mode of Data Storage: *Electronic*

Legal basis of personal data processing

With the use of the functions described in points 1. a)-b) (e.g. signing up to the newsletter of booking accommodation) the User provides consent for the Controller to process their personal data. The User's voluntary consent is based on the acceptance of this current notice.

In certain cases it may be necessary by law for the scope of the data to be processed, stored and forwarded in which case the subject will be informed by the Controller.

4) Who may view the registered data?

The Controller and any Data Processors contracted by him are legally authorized to view the personal data.

5) User's rights in relation to processed data

The Controller shall provide upon request by the User, information about the personal data he has processed, that is about their source, the goals of data processing, the legal basis, the duration, as well as – in the case of having forwarded the subject's personal data – the legal basis for forwarding and the addressee. This information is available in email form at the email address recepcio@balatonivendeghaz.hu as well as by post at the following address: Balaton, H-8257 Badacsonytomaj-Badacsonyörs városrész, Klastrom u. 7. In both cases personal identification and a correspondence address are required. The Controller shall reply in writing within a maximum of 30 days following the date of receiving the request.

The User may also request the correction of their data (indicating the correct data to be used) at the above address.

Other than the above the User can request at anytime that their data be deleted or closed either in part or entirely, using the above address, without payment or reason, by providing their email address. The Controller shall take care of cancelling the user's data and deleting them from the records without delay following the receipt of the request.

Instead of deleting, the Controller can lock the personal data if the User so requests. This locked data may only be treated like this while the data processing goal remains which ruled out the deleting of the personal data.

Furthermore, the User may decide at any time that the Controller should no longer send them the Newsletter. The User can at anytime request to opt out of the newsletter by clicking on the link at the bottom of the newsletter, by email at recepcio@balatonivendeghaz.hu or by post at Balaton, H-8257 Badacsonytomaj-Badacsonyörs városrész, Klastrom u. 7 without any cost, reason or limit. The User's data will be deleted from the direct marketing database without delay upon receipt of the request and no further newsletters will be sent to the User.

II. Other Information collected in relation to usage of the Webpage.

1) What kind of information do we collect in relation to usage of the webpage?

A software runs on the webpage to collect data on the visitors to the page. Oázis a Klastromhoz Wellness Guesthouse automatically receives information about the visitors to the Webpage: The visitors IP address, the time of the visit, data on which pages were visited and which internet browser was used.

Data Processing Goal: *To examine the habits of visitors to the webpage, to assist contact with the Controller*

Scope of Data Processed: *Visitor's IP address, time of visit, data on which pages were visited, which internet browser was used*

Legal basis of Data Processing: *Based on the subject authorization in GDPR 6. article (1) par. a) point*

Data storage deadline: *One year from the recording of the data*

Method of Data Storage: *Electronic*

Based on the above written in Part I, if the User on the Webpage does not expressly provide data about himself, the Controller in no way collects or handles any data about the user by which the User could be identifiable by person.

By visiting the webpage, every User gives consent that the Controller, based on Part II of this notice, uses cookies on the Webpage for the necessary information recording by external service providers.

This data recorded is used on the computer that the User is logged into and the cookies used on the Webpage generate results for that computer as a result of automatic technical processes. The system logs this automatically recorded data when the User visits and leaves the Webpage unless the User especially requests or takes action to prevent this.

These data are not connected to any of the user's personal data and thus the User is not identifiable in this manner. Only the Controller and the external service provider handling the cookies have access to this data.

The Controller uses exclusively the cookies of external service providers (Google, Facebook). Cookies are short word files which the Webpage sends to the hard-drive of the User's computer and contain information about the User.

The Controller uses the services of the Google Analytics system in relation to the Webpage. Cookies handled by Google Analytics assist in the measurement of visitor and web analytics data. Information generated by the cookies is forwarded to external servers operated by Google for storage. Google uses this information in the interests of the Controller to assist him in tracking visits to the Webpage and analysing activities carried out on the Webpage. Google has the right to forward this information to third parties if it is legally required. Detailed information about data analysed by Google Analytics can be found here: (<http://www.google.com/analytics>).

The Controller advertises on the internet using external service providers (Google, Facebook). These external service providers (Google, Facebook) store, with the help of Cookies, that the User has visited the Controller's Webpage previously and on the basis of this the tailor-made adverts appear to the User (that is remarketing activities are carried out).

2) How do we use this information?

The above mentioned data collected using technology can not be used to identify the User and the Controller in no way connects the information with any other data used for possible identification.

The primary purpose of the data is for the Controller to be able to operate the Webpage effectively, for which it is necessary to be able to track the data of visits to the page, and to eliminate any possible abuse of the Webpage..

Other than the above, the Controller can use the data for the purposes of analysing user tendencies and for improving the functionality of the Webpage as well as receiving general traffic data on the usage of the Webpage.

The Controller can use that information for creating statistics about the usage of the webpage as well as analyse statistical data which are not usable for personal identification. (e.g. Visitor numbers, most viewed themes, content) and can forward this to third parties or publish the data using anonymous methods.

3) Possibility to turn off cookies:

If you wouldn't like data to be collected on you as detailed above based on your usage of the Webpage, it is possible to turn off cookies either partially or entirely using your browser settings. It is also possible to modify the cookie messages.

Google cookies can be disabled using the Advertising Settings (for more information see: <http://www.google.hu/policies/privacy/ads/>). The User can disable the cookies of external service providers using Network Advertising Initiative (<http://www.networkadvertising.org/choices/>)

4) Cookies located at Third Parties:

The Webpage may contain information, especially adverts, which derive from such third parties and advertisers who do not have an official connection to Oázis a Klastromhoz Wellness Guesthouse. It may happen that these third party service providers place cookies or web beacons on the user's computer, or use similar technologies in order to collect data in the interests of sending their own advertising messages to the user. In these cases, the data protection notice of the third party takes precedence and the Controller takes no responsibility for this form of data processing.

III. Links

Oázis a Klastromhoz Wellness Guesthouse does not take any responsibility for the content and data protection processes of links on the Webpage leading to external web pages. If Oázis a Klastromhoz Wellness Guesthouse discovers that links provided by it violate any laws or third party rights it will immediately remove them from the Webpage.

IV. Data Security

The Controller is committed to taking care of data security and furthermore will take the necessary technical and organisational steps as well as establishing the procedural regulations necessary to ensure that the data recorded, stored and handled be protected and in addition to prevent the data being destroyed, or used or altered without consent. The Controller is also

committed to contacting any third parties to whom data is sent or forwarded with the consent of the User to ensure that they are doing enough to meet the data security requirements.

The Controller has to ensure that the handled data is not accessible to unauthorised persons who may not publish, forward, modify, or delete the data. The managed data can only be viewed by the Controller, his employees and Data Processors employed by him. The Controller can not provide the data to those persons who are not authorised to view it.

The Controller shall do everything in his power in order that that data not be damaged or destroyed accidentally. The above commitment is also provided to the subcontractors hired by the Controller for the purposes of data processing activities.

The User recognizes and accepts that by giving providing their personal data on the webpage – despite the fact that Oázis a Klastromhoz Wellness Guesthouse has up-to-date security features in the interests of preventing unauthorized access or viewing of data – that entire protection of data on the internet can not be guaranteed. Oázis a Klastromhoz Wellness Guesthouse is not responsible for consequences resulting from unauthorized access to or efforts to see the data. In addition to this, the User can also give their personal data to third parties who could use their data for illegal purposes.

In no circumstances does the Controller collect particular data, that is such data relating to racial origins, national or ethnical minority groups, political opinions or party preferences, religious or other world views, membership of interest groups, health status, diseases, sexual life or previous convictions.

In the interests of data security it is essential that if internet is used in public places or on public computers to log out of the Webpage after use. If you use our webpage on your own computer then it may be the case that you remain logged in for a certain period of time depending on the application. In these cases, it is necessary to be wary that strangers can not access the computer and can not carry out transactions (sign-up, bookings) in your name.

V. Data Processors

The Controller uses the following data processor for activities of an exclusively technical nature in the process of personal data processing:

Data Processor Name: ERMI-TIM Könyvvizsgáló és Adótanácsadó Korlátolt Felelősségű Társaság

Address: 9012 Győr, Ybl sétány 17.

Data Processing Goal: Bookkeeping, Payroll

Data Processor Name: Facebook Inc.

Address: 1601 WILLOW ROAD, MENLO PARK, CA 94025

Data Processing Goal: marketing

The Data Processors carry out the data handling on the instructions of the Controller and they do not make meaningful decisions affecting the data processing, they can only process the personal data received exclusively on the orders of the Controller, they can not process the data for their own purposes and they must store and protect the personal data according to the orders of the Controller.

VI. Changes to the Notice.

The Controller reserves the right to make changes to the notice. If the changes affect the use of the personal data provided by the subject, the user will be informed of the changes in the form of an email information letter.

If as a result of the changes the details of the data processing change, the Controller will make a specific request for the subject's consent.

VII. Questions not stated in the current notice.

For questions not stated in the current notice, GDPR or the Infotv. regulations as an assisting guide are the authoritative voice.

VIII. Possibilities to enforce legal rights.

Oázis a Klastromhoz Wellness Guesthouse does everything in its power to conform to the regulations relating to data processing. If you feel that this is not the case, please write to us by email at recepicio@balatonivendeghaz.hu or by post at Balaton, H-8257 Badacsonytomaj-Badacsonyörs városrész, Klastrom u. 7.

If you feel that your rights to personal data protection have been violated you may exercise your legal rights at the relevant authority bodies:

- National Authority for Data Protection and Freedom of Information (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.)
- At Court.

The National Media and Infocommunications Authority deal with complaints sent electronically. The detailed regulations on information technology self-determination law can be found in the law of 2011 CXII and certain questions on commercial electronic service providers and information technology services related to society can be found in the law of 2001 CVIII.

IX. Other provisions

The current notice is guided by the principles of Hungarian law, and in particular the law of information technology self-determination and the 2001 law CXII. related to freedom of information. The Controller reserves the right to change the notice unilaterally at any time by informing those affected previously.

Badacsonyörs, May 22 2018.

Oázis a Klastromhoz Wellness Guesthouse Controller