



Kempinski Hotel
Corvinus

BUDAPEST

**PRIVACY NOTICE AND PROCESS DESCRIPTION REGARDING DATA PROCESSING ACTIVITIES
CONDUCTED DURING THE USE OF THE WEBSITE OF KEMPINSKI HOTEL BUDAPEST ZRT.**

Kempinski Hotel Budapest Zrt. (hereinafter: **The Company** or **Data Controller**), in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter referred to as GDPR), hereby informs you, by means of this information notice and process description, of all facts relating to the processing of your personal data. By participating in the process, you, as the data subject, will become a data subject in accordance with this process description.

NAME AND CONTACT DETAILS OF THE DATA CONTROLLER:

Name of Data Controller: Kempinski Hotel Budapest Zrt.
Data Controller company registration number: 01-10-041234
Data Controller tax number: 10250378-2-41
Data Controller's registered office: 1051 Budapest, Erzsébet tér 7-8.
Data Controller email address: hotel.corvinus@kempinski.com
Individuals entitled to represent Data Controller: Stephan Interthal CEO
René Frischknecht - Chairman of the Board of Directors
Jasmeet Sehmi - Vice Chairman of the Board of Directors
Xavier Destribats - Member of the Board of Directors

THE (NAME AND) CONTACT DETAILS OF THE DATA CONTROLLER'S DATA PROTECTION OFFICER:

Data Controller's Data Protection Officer: L-Tender Data Protection and Information Security Services Ltd.

Contact details of the Data Protection Officer: privacy.corvinus@kempinski.com

COOKIES USE

DESCRIPTION OF THE DATA MANAGEMENT PROCESS:

The *Company operates its own website*, which can be accessed at <https://www.kempinski.com/hu/hotel-corvinus-budapest>. The website uses automatic data collection (cookies, Google Analytics, etc.).

Visitors to the website may access and navigate it through the use of small data files known as cookies, which the website places on and retrieves from visitors' computer devices. Cookies are employed to ensure the website operates correctly, to enhance service efficiency, and to collect anonymous data for statistical analysis.

Cookies may be removed from the visitor's device either automatically upon closing the browser or manually by the visitor, who can also configure their browser to disable cookie usage. The website remains accessible even if you have manually disabled cookies in your browser settings.

On the one hand, the website uses a unique, temporary "spublic" cookie to identify workflows, i.e. to determine whether the visitor is logged in to the website or not. The "spublic" cookie is therefore used to allow visitors to enter and leave the website. A "spublic" cookie is a temporary cookie that is automatically deleted from the visitor's computer device when the browser is closed, or can be manually deleted by the visitor in the browser settings.



Kempinski Hotel
Corvinus

BUDAPEST

The following cookies are used to help us to determine the following statistical information about your visit to the website and the number of visitors to the website, collected for this purpose:

- a Visitor has reached the website through a search engine, keyword or link ("utmz" cookie),
- how many times the visitor has visited the website ("utmb" cookie),
- how long the visitor has been on the website ("utma" and "utmv" cookies),
- when the visitor first visited the website ("utma" and "utmv" cookies),
- when the visitor last visited the website ("utmc" and "utmv" cookies).

In addition to the above, some cookies protect the website from being overloaded ("utmt" cookie), and some cookies used by Google Analytics also record the IP address of the visitor's computer device for analytical, statistical and security purposes. The data is stored on the visitor's IT device. The independent measurement and auditing of the website's traffic and other web analytics data is facilitated by Google Analytics servers as an external service provider, using the cookies listed above. The Data Controller for the measurement data provides detailed information regarding the handling of such data on the website <https://www.google.com/analytics/>, while further information on Google's privacy principles can be accessed via the link <http://www.google.hu/intl/hu/policies/privacy/>. The data transmitted from the website to Google Analytics servers cannot directly and exclusively identify the visitor but serves only to identify the IP address of the computer device.

By visiting the website and clicking the "Accept" button, the visitor consents to the Data Controller's use of cookies, managed either by external service providers or by the Data Controller itself, for purposes related to the operation of the website, and to the potential recording of data and information as outlined in this policy, subject to the applicable settings.

Such data includes information about the visitor's computer, generated during use of the website and recorded by the cookies employed on the website as a result of automatic technical processes. Data that is automatically recorded is logged by the system without any specific declaration or action by the user when the user visits or exits the website.

Depending on the settings, the saved data will not be associated with other personal user data and will be accessible only to the third-party cookie service provider (e.g., Google) and the Data Controller. The Visitor cannot be identified from this data.

PURPOSE OF DATA PROCESSING:

Recording of visitor data during visits to the website in order to monitor the functioning of the service and prevent abuse.

LEGAL BASIS FOR PROCESSING:

The legal basis for processing is the data subject's consent pursuant to **Article 6(1)(a) of the GDPR**

SCOPE OF DATA PROCESSED:

the date, time, IP address of the user's computer, the address of the page visited, the address of the page previously visited, the user's operating system and browser

IN THE COURSE OF THE PROCESSING, THE DATA WILL BE TRANSFERRED TO THE FOLLOWING THIRD PARTIES UNDER THE INDICATED LEGAL BASIS:

The *Company* does not transfer the data to third parties, but shall remind data subjects that the disclosure of personal data to courts and authorities may be required by law. If the *Company* is required by a court or authority to provide personal data in the course of legal proceedings, in



Kempinski Hotel
Corvinus

BUDAPEST

fulfilment of its legal obligation, the **Company** is obliged to provide the requested data to the court or authority in question.

PERSONAL DATA STORAGE DURATION:

Personal data will be electronically processed by **Company** for 30 days from the date of visiting the website.

FACT OF AUTOMATED DECISION MAKING:

No automated decision making is performed during the processing.

RULES ON THE EXERCISE OF DATA SUBJECT RIGHTS:

The **Company** informs you that, under the GDPR, you may, after verifying your identity, exercise the following rights:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- may withdraw your consent to the processing,
- may request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- exercise your right to data portability (if the processing is carried out by automated means).

CONTACT VIA THE WEBSITE

DESCRIPTION OF THE DATA MANAGEMENT PROCESS:

The **Company operates its own website**, which can be accessed at <https://www.kempinski.com/hu/hotel-corvinus-budapest>.

Anyone can access the website without revealing their identity or revealing their personal data, and can obtain information freely and without restriction on the website and its linked pages.

The Company provides the possibility for the visitor to contact it through the website it operates, by clicking on "Contact us" <https://www.kempinski.com/en/contact-us>. Under the contact menu, the visitor can send a message by entering his/her name, e-mail address, telephone number. However, in all cases, you will only be able to send your message if you accept the **Company's** privacy policy, which you can do by ticking a box.

The domain of the website www.kempinski.com is owned by Kempinski Hotels S.A. The Company is responsible for the content and updating of the <https://www.kempinski.com/hu/hotel-corvinus-budapest> website.

The Company provides the possibility for the visitor to contact the Company through the website. By filling in a form, the visitor can provide the relevant information needed to contact you. The data subject may only submit their data if they accept the Company's data processing rules, which is done by ticking a box; otherwise, they will be unable to send the message.

PURPOSE OF DATA PROCESSING:

Facilitation of contact with the **Company** through the website is available under the menu item <https://www.kempinski.com/en/contact-us>.

LEGAL BASIS FOR PROCESSING:

The legal basis for processing is the data subject's consent pursuant to **Article 6(1)(a) of the GDPR**



Kempinski Hotel
Corvinus

BUDAPEST

SCOPE OF DATA PROCESSED:

Under the menu item <https://www.kempinski.com/en/contact-us>: name of the data subject, email address, telephone number, and content of the message.

INDICATION OF THE DATA PROCESSORS INVOLVED IN THE PROCESSING AND THE PROCESSING OPERATION:

The *Company* involves a data processor in the processing of data.

IN THE COURSE OF THE PROCESSING, THE DATA WILL BE TRANSFERRED TO THE FOLLOWING THIRD PARTIES UNDER THE INDICATED LEGAL BASIS:

The *Company* does not transfer the data to third parties, but shall remind data subjects that the disclosure of personal data to courts and authorities may be required by law. If the *Company* is required by a court or authority to provide personal data in the course of legal proceedings, in fulfilment of its legal obligation, the *Company* is obliged to provide the requested data to the court or authority in question.

PERSONAL DATA STORAGE DURATION:

The Company retains the data processed during contact via the website until the objective is achieved and the matter of the inquiry is resolved.

FACT OF AUTOMATED DECISION MAKING:

No automated decision making is performed during the processing.

RULES ON THE EXERCISE OF DATA SUBJECT RIGHTS:

The *Company* informs you that, under the GDPR, you may, after verifying your identity, exercise the following rights:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- may withdraw your consent to the processing,
- may request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- exercise your right to data portability (if the processing is carried out by automated means).

DATA PROCESSING IN CONNECTION WITH THE SENDING OF THE NEWSLETTER

PURPOSE OF DATA PROCESSING:

Communicating through marketing communication channels by sending newsletters to subscribers' e-mail addresses.

LEGAL BASIS FOR PROCESSING:

The legal basis for processing is the data subject's consent pursuant to **Article 6(1)(a) of the GDPR**

SCOPE OF DATA PROCESSED:

Mandatory information: e-mail address, language.

Optional information: name (first name, surname), title, gender, date of birth, company name, job title, country, postcode, city, membership number, interests.



Kempinski Hotel
Corvinus

BUDAPEST

INDICATION OF THE DATA PROCESSORS INVOLVED IN THE PROCESSING AND THE PROCESSING OPERATION:

The **Company** does not involve a data processor in the data processing.

IN THE COURSE OF THE PROCESSING, THE DATA WILL BE TRANSFERRED TO THE FOLLOWING THIRD PARTIES UNDER THE INDICATED LEGAL BASIS:

The **Company** does not transfer the data to third parties, but shall remind data subjects that the disclosure of personal data to courts and authorities may be required by law. If the **Company** is required by a court or authority to provide personal data in the course of legal proceedings, in fulfilment of its legal obligation, the Company is obliged to provide the requested data to the court or authority in question.

PERSONAL DATA STORAGE DURATION:

Data will be retained until the cessation of the newsletter service; however, if the data subject requests the deletion of their data (unsubscribes from the newsletter), this will occur immediately upon receipt of the deletion request.

DESCRIPTION OF THE DATA MANAGEMENT PROCESS:

The **Company** operates multiple newsletters. Newsletters are sent by the **Company** to the email addresses listed in the database associated with each newsletter at specified intervals. As email addresses are considered relative personal data under current legal interpretations, the **Company** handles all email addresses in compliance with personal data protection requirements.

Accordingly, an email address may only be included in the database with the explicit consent of the data subject and upon their specific request. To obtain the data subject's consent for processing their email address by the **Company**, the **Company** provides full details of all relevant facts concerning the processing.

In all cases, the **Company** ensures the data subject's right to prior information and the ability to provide consent voluntarily. This is accomplished by providing the information and using a checkbox to obtain and evidence explicit consent for the processing.

If the data subject provides their email address on paper rather than electronically, the document will include information about the data processing, and the data subject consents to this by completing the data collection form.

The **Company** treats the sending of newsletters as a distinct data processing purpose and does not combine it with other purposes, such as service usage. Accordingly, the Company provides the data subject with a separate declaration for any different purposes, such as service usage and consent to receive newsletters, whether the data is provided via a data collection interface (paper or online).

The user of the relevant email address may unsubscribe from the newsletter at any time, free of charge.

However, the **Company** reserves the right to send requests to an e-mail address that does not constitute personal data. In such instances, you will receive the following information in your newsletter:

"The e-mail address to which this newsletter is sent is obtained from the public register, where it is designated as the electronic contact information of the company. Consequently, data relating to the representation of the company are not classified as personal data, even if they (also) include the name of the owner or representative of the company. According to Article 6 (1) of Act XLVIII of 2008 on the basic conditions and certain restrictions of economic advertising activities, no prior consent is required for direct advertising communications via electronic mail or other equivalent means



Kempinski Hotel
Corvinus

BUDAPEST

concerning the aforementioned data. However, if you do not wish to receive any further correspondence from us, please [click here to unsubscribe](#)."

QR code card:

The **Company** will always provide you with a small card featuring a QR code along with your hotel room key. By scanning the QR code, the data subject can subscribe to the **Company's** newsletter. If the data subject does not possess a QR code reader, they may subscribe directly to the newsletter using the contact details provided on the card.

In all cases, the **Company** ensures the data subject's right to prior information and the ability to provide consent voluntarily. This is accomplished by providing the information and using a checkbox to obtain and evidence explicit consent for the processing.

The user of the relevant email address may unsubscribe from the newsletter at any time, free of charge.

FACT OF AUTOMATED DECISION MAKING:

No automated decision making is performed during the processing.

RULES ON THE EXERCISE OF DATA SUBJECT RIGHTS:

The **Company** informs you that, under the GDPR, you may, after verifying your identity, exercise the following rights:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- may withdraw your consent to the processing,
- may request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- exercise your right to data portability (if the processing is carried out by automated means).

DATA PROCESSING IN RELATION TO THE TABLE RESERVATION SYSTEM

DESCRIPTION OF THE DATA MANAGEMENT PROCESS:

The Company operates an online reservation system that allows guests to book a table at the hotel restaurant.

Pursuant to the contract, the operation and maintenance of the system will be carried out by an external service provider, Eat2Eat, which will act as a data processor in the process.

PURPOSE OF DATA PROCESSING:

This includes making reservations at the hotel restaurant, recording guest requests, and fulfilling prior guest requests.

Additionally, a database will be established within the Kempinski network chain (with data transfer) to provide a higher level of service to returning guests.

LEGAL BASIS FOR PROCESSING:

Article 6(1)(f) of the GDPR, which states that processing is necessary for the purposes of the legitimate interests pursued by Data Controller or a third party.

SCOPE OF DATA PROCESSED:

Name, phone number, e-mail address.



Kempinski Hotel
Corvinus

BUDAPEST

INDICATION OF THE DATA PROCESSORS INVOLVED IN THE PROCESSING AND THE PROCESSING OPERATION:

Your electronically recorded data is also processed by Eat2eat Pte Ltd.(120 Robinson Road #08-01 Singapore 068913).

Data management: using restaurant reservation software, recording, storing and transmitting data.

IN THE COURSE OF THE PROCESSING, THE DATA WILL BE TRANSFERRED TO THE FOLLOWING THIRD PARTIES UNDER THE INDICATED LEGAL BASIS:

Data Controllers will transfer the data to third parties, Kempinski Hotels S.A., designated as joint data controller. The details of the joint controller's privacy statement can be accessed via this link:

<https://www.kempinski.com/en/privacy-policy>

However, data subjects are reminded that the disclosure of personal data to courts and authorities may be required by law. If the **Data Controllers** are required by a court or authority to provide personal data in the course of legal proceedings, in fulfilment of its legal obligation, the **Data Controllers** are obliged to provide the requested data to the court or authority in question.

PERSONAL DATA STORAGE DURATION:

For the Hungarian entity, 5 years after the purpose of the processing has been achieved.

FACT OF AUTOMATED DECISION MAKING:

No automated decision making is performed during the processing.

RULES ON THE EXERCISE OF DATA SUBJECT RIGHTS:

The **Data Controllers** shall hereby inform you that, pursuant to the GDPR, you may, after verifying your identity, exercise the following rights in relation to the data processing:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- may request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR),
- may request the restriction of the processing of your personal data,
- may object to the processing.

SERVICE-RELATED DATA PROCESSING

Table reservation system (restaurant)

As set out in the separate information note detailed above.

Accommodation service

The main activity of the Company is the provision of accommodation.

Room reservations and service requests can be made by phone, e-mail or via the website <https://www.kempinski.com/hu/hotel-corvinus-budapest>. Guests may also request room reservations through online sales agents and direct booking channels (OWS system).

Upon completing a booking, the Company sends a confirmation email to the data subjects using software provided by a third-party service provider. The Company utilises the eStandby feature of the Nor 1 system, which offers bookers a unique opportunity to upgrade to a higher category reservation



Kempinski Hotel
Corvinus

BUDAPEST

via email after the original booking. If the booker declines the offer, their original reservation will remain unchanged.

In addition to the confirmation email, the Company sends guests a questionnaire to complete before their arrival. Through this questionnaire, guests can provide various preferences and personal data. The purpose of the questionnaire is to enable the Company to deliver high-quality services tailored to the specific needs of guests. Completion of the questionnaire is entirely optional; if guests choose to complete and return it, the legal basis for processing the personal data provided is the data subject's consent, as per Article 6(1)(a) of the GDPR.

Guests may pay online in advance for their reservations at www.kempinski.com/budapest. Guest details related to the payment process are forwarded to the contracted electronic payment service provider.

Online payments are processed by Adyen, acting as the data processor.

purpose of data processing: providing a quotation for the use of accommodation services, booking a room

scope of data processed: Selected date, number of rooms, number of guests in the reservation (adults and children), age of children, selected price/offer, name, address, email address, and credit card details. Frequent traveller information*, arrival information*, room and bed type preferences*, telephone number*, and loyalty programme membership*. The information marked with an asterisk is optional.

The legal basis for processing is the data subject's consent pursuant to Article 6(1)(a) of the GDPR; if a reservation is made based on the offer, the legal basis is the fulfilment of a contractual obligation pursuant to Article 6(1)(b) of the GDPR with regard to the reservation data.

deadline for data storage: 90 days from the date of the last account closure or, in the case of cancellation without invoice, from the date of cancellation

method of data storage: electronic

rules on the exercise of data subject rights: the *Company* informs you that, under the GDPR, you may, after proving your identity, exercise the following rights:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- may withdraw your consent to the processing,
- may request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- exercise your right to data portability (if the processing is carried out by automated means).

The Company's partners also have the option to make group bookings. In the case of group bookings, the partners will transmit the data of the data subjects to the Company.

For group bookings, the Company will provide the following information to its partners in accordance with its General Terms and Conditions (GTC):

"In connection with group bookings, our partners send the following data to our Company: name, date and place of birth, arrival/departure times, flight details, and passport information for visa applications. By submitting the data, our partners conduct a data transfer; upon receipt of the data, our Company commences its independent data processing in the context of its service activities, which is carried out in accordance with the provisions of this Policy.

The Company does not intend to enter into a separate contract with its partners regarding the transfer of data."



Kempinski Hotel
Corvinus

BUDAPEST

The purpose of processing is to provide a quotation for accommodation services and to facilitate room bookings in the case of group bookings.

The scope of the data processed includes name, date and place of birth, arrival/departure dates, flight details, and possibly passport information for visa applications.

The legal basis for processing is the data subject's consent pursuant to Article 6(1)(a) of the GDPR; if a reservation is made based on the offer, the legal basis is the fulfilment of a contractual obligation pursuant to Article 6(1)(b) of the GDPR with regard to the reservation data.

deadline for data storage: 90 days from the date of the last account closure or, in the case of cancellation without invoice, from the date of cancellation

method of data storage: electronic

rules on the exercise of data subject rights: the *Company* informs you that, under the GDPR, you may, after proving your identity, exercise the following rights:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- may withdraw your consent to the processing,
- may request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- exercise your right to data portability (if the processing is carried out by automated means).

Upon the guest's arrival, the Company records the data on paper during the check-in process, and subsequently, the check-in form, bearing the guest's signature, is stored electronically in scanned format by the Company.

In order to protect the rights, safety, and property of data subjects and others, as well as to ensure compliance with regulations regarding the stay of third-country nationals and persons entitled to freedom of movement and residence, the Company also records the data via the accommodation management software on the server designated by the Government at the time of check-in.

With regard to third-country nationals, the immigration authority receives data from the Company via the service provider through an IT application, and maintains records on the entry and stay of third-country nationals in accordance with Section 73(3) of Act II of 2007 to monitor the legality of their stay.

The Company is obliged to record certain personal data of every guest (surname, given name, birth surname and given name, place of birth, date of birth, gender, nationality, mother's birth surname and given name, if included in the identification document, identification data from the identity document or travel document, and in the case of a third-country national, the visa or residence permit number, as well as the date and place of entry) through an identification document reader at the time of check-in, in accordance with Act CLVI of 2016 on the State Responsibilities for the Development of Tourist Areas, Government Decree 235/2019 (X. 15.) on the implementation of the Act, and Government Decree 414/2015 (XII. 23.) on the rules for issuing identity cards and the uniform capturing of photographs and signatures.

Data is transmitted to the Closed Guest Information Database (VIZA) by the hosting module integrated into the accommodation management software.

The Company does not store images of scanned documents.

To record the data, the guest must present their identification card or travel document to the Company. Failure to present this document will result in the Company refusing the accommodation service.



Kempinski Hotel
Corvinus

BUDAPEST

By using OTP SimplePay and SIX Payment Services - SaferPay, customers can enter their credit card details via a secure web link, ensuring that the Company remains unaware of the card details.

After guests depart, a guest satisfaction questionnaire is distributed annually, commissioned by an external service provider.

purpose of data processing: use of accommodation services

scope of data processed:

- a) surname(s) and given name(s), name(s) and given name(s) at birth, previous surname(s) and given name(s)*, place and date of birth, sex, mother's surname(s) and given name(s) at birth, nationality(ies) or stateless status, identification data from the applicant's identity document or travel document, start and expected end date of the stay, *visa or residence permit number, and *date and place of entry.
- b) Telephone number, email address, and additional data for companies, including company name and position.
- c) Other data processed may include food allergies, feather allergies, and information regarding special dietary needs.

legal basis for processing:

- a) Regarding data transfer and record-keeping tasks: compliance with the legal obligations under Article 6 (1) c) of the GDPR, specifically Act CLVI of 2016 concerning the state responsibilities of the development of tourist areas, Government Decree 235/2019 (X. 15.) regarding the implementation of the Act on the state responsibilities of the development of tourist areas, Government Decree 414/2015 (XII. 23.) concerning the issuance of identity cards and the rules for the unified capture of photographs and signatures, Act XCVII of 2018 amending Act CLVI of 2016 on the state responsibilities of the development of tourist areas and related acts, Chapter 6/B, Section 9/H (1), and Act II of 2007 on the entry and residence of third-country nationals, Section 73 (1). In the case of data marked with an asterisk, reference is made to Act II of 2007 on the entry and residence of third-country nationals, Section 73 (1).
- b) For reservations made in accordance with the information published on the booking interface: compliance with contractual obligations under Article 6(1)(b) of the GDPR.
- c) In relation to emails sent directly to our email address or telephone reservations: consent of the data subject under Article 6(1)(a) of the GDPR.

deadline for data storage: 8 years in accordance with Section 169 of Act C of 2000.

method of data storage: electronic and paper-based

rules on the exercise of data subject rights: the *Company* informs you that, under the GDPR, you may, after proving your identity, exercise the following rights:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- may withdraw your consent to the processing,
- may request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- exercise your right to data portability (if the processing is carried out by automated means).

The electronically recorded data is stored by the Company's parent company, Kempinski Hotels S.A., and KEY International Hotels Management Co. Ltd.

On the registration form, guests have the option to register for the Company's loyalty programme. In this case, the name and email address of the data subject will be included in the loyalty programme



Kempinski Hotel
Corvinus

BUDAPEST

database, and they will receive regular emails from the Company regarding available services, offers, promotions, and other related information.

purpose of data processing: registration in the Company's loyalty program

scope of data processed: name, e-mail address

legal basis for processing: data subject's consent pursuant to Article 6(1)(a) of the GDPR

deadline for data storage: until the data subject requests erasure.

method of data storage: electronic

rules on the exercise of data subject rights: the *Company* informs you that, under the GDPR, you may, after proving your identity, exercise the following rights:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- may withdraw your consent to the processing,
- may request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- exercise your right to data portability (if the processing is carried out by automated means).

SPA service

The Company provides SPA services for its guests.

The service is available to both guests and external guests.

You can register in person, by phone, email or online. To log in to the service, the following data will be collected:

- for a guest: name, room number
- for external guests: name, telephone number and e-mail address

Before using the service, each data subject is required to fill in a data collection form, which may include specific personal data.

The Company records the data in the RMS system, which is operated on behalf of an external service provider.

The data is also recorded by the Company in another electronic register (Ovatu system). The system is operated and maintained by an external service provider on a contract basis.

purpose of data processing: SPA service. Issuing an invoice.

scope of data processed: name, date of birth, telephone number, e-mail address, *health-related data, *medical conditions, *in the case of a guest, also the room number and the time of departure.
billing information: name, address.

legal basis for processing: the performance of a contractual obligation pursuant to Article 6(1)(b) GDPR, *the prohibition on processing special categories of personal data is exempted by Article 9(2)(a) GDPR.

deadline for data storage:

- 3 months after the service is used
- billing data: 8 years in accordance with Act C of 2000.

data storage method: electronic and paper-based

rules on the exercise of data subject rights: the *Company* informs you that, under the GDPR, you may, after proving your identity, exercise the following rights:

- request information about the processing of your personal data,



Kempinski Hotel
Corvinus

BUDAPEST

- may request the rectification of your personal data,
- request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- may object to the processing,
- have the right to appeal.

You may also apply for a membership card (season ticket).

In such cases, the Company will request the following information: name, address, email address, telephone number, chosen services (type of rental), and the amount paid.

From the data provided, the Company records the name, chosen services (type of rental), and amount paid in the RMS system, which is operated by an external service provider on the Company's behalf. The data is also recorded by the Company in another electronic register (Ovatu system). The system is operated and maintained by an external service provider on a contract basis.

purpose of data processing: to request a membership card to use SPA services

scope of the data processed: name, address, e-mail address, telephone number services chosen (type of pass), amount paid

legal basis for processing: data subject's consent pursuant to Article 6(1)(a) of the GDPR

deadline for data storage:

- 3 months after the expiry of the membership card
- billing data: 8 years in accordance with Act C of 2000.

data storage method: electronic and paper-based

rules on the exercise of data subject rights: the *Company* informs you that, under the GDPR, you may, after proving your identity, exercise the following rights:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- may withdraw your consent to the processing,
- may request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- exercise your right to data portability (if the processing is carried out by automated means).

Garage rental

The Company provides an underground car park, which may be used by the persons concerned as follows:

- Guests have automatic access to the underground car park.
- Daily guests may also use the facility. In such cases, a garage ticket is issued at the entry point, displaying the vehicle's registration number and the time of arrival.
- The underground car park is also available for rental use.

purpose of data processing: use of the Company's underground car park

scope of data processed:

- licence plate number, entry-exit time
- tenancy agreement: tenant's name, address, tax number, company registration number, telephone number, e-mail address



Kempinski Hotel
Corvinus

BUDAPEST

legal basis for processing: performance of a contractual obligation pursuant to Article 6 (1) b) of the GDPR

deadline for data storage:

- 5 years after the purpose of the data processing has been achieved
- billing data: 8 years in accordance with Act C of 2000.

method of data storage: electronic

rules on the exercise of data subject rights: the *Company* informs you that, under the GDPR, you may, after proving your identity, exercise the following rights:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- may object to the processing,
- have the right to appeal.

TAXI and LIMOUSINE SERVICES

purpose of data processing: transport of guests

scope of data processed: name of the passenger

legal basis for processing: performance of a contractual obligation pursuant to Article 6 (1) b) of the GDPR

deadline for data storage: 5 years after the purpose of the data processing has been achieved

method of data storage: electronic

rules on the exercise of data subject rights: the *Company* informs you that, under the GDPR, you may, after proving your identity, exercise the following rights:

- request information about the processing of your personal data,
- may request the rectification of your personal data,
- request the erasure of your personal data (under the conditions set out in Article 17(1) of the GDPR)
- may request the restriction of the processing of your personal data,
- may object to the processing,
- have the right to appeal.

The Company shall ensure the security of the data, and shall take all technical and organisational measures necessary to enforce the GDPR and other data protection and confidentiality rules. The Company shall protect the data against unauthorised access, alteration, disclosure, deletion or destruction and against accidental destruction or damage.

The Company will endeavour to ensure that the information provided to you is as concise, transparent, comprehensible, easily accessible, clear and understandable as possible, in all cases, while complying with the rules set out in the GDPR.

If you wish to exercise your rights under the GDPR for the purposes set out in this notice, you may make your request in writing, in particular to the Data Protection Officer at the contact details set out in this notice. However, if you request information orally, an authorised employee of the Company may, after verifying your relevance, provide you with the information orally, provided that the necessary data are available to him/her. In all other cases, the request will be recorded by our team



Kempinski Hotel
Corvinus

BUDAPEST

member, and you will be informed of your request within one month of receipt of the request at the latest. If justified by the complexity of the application or the number of applications currently being processed, this deadline may be extended by a maximum of two additional months, but you will be informed electronically within one month of receipt of the application.

If we do not act on your request or if you do not accept our action, you can appeal. You may lodge a complaint about our data processing practices with the National Authority for Data Protection and Freedom of Information or, at your choice, with the competent court in your place of residence or domicile.

National Authority for Data Protection and Freedom of Information contact details

Address: 1055 Budapest, Falk Miksa u. 9-11.

Mailing address: 1363 Budapest, Pf.: 9.

Customer service (phone): +36 (30) 683-5969 and +36 (30) 549-6838

For more information about submitting request, please visit <https://www.naih.hu>
