

# Privacy Policy

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## **I. Data Controller**

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(hereinafter: „Company” or „Chesscom Kft.”)

The Company respects the personal rights of its Guests, hence it prepared this Data Protection Guide (hereinafter: Guide), which is available in electronic format at the Company's website as well as in print format in each hotel.

The Company, as data controller, hereby states that it observes the provisions of Act 112 of 2011 (hereinafter: "Data Protection Act") on the rights for information management and freedom of information.

This Guide provides a general overview on how the Company manages data in the course of its services. Due to the wide range of Guests' demands, the manner of data management may occasionally vary from what is described in this Guide. Such variance may occur upon the request by the Guest, and the Company shall inform

the Guest about the particular manner in advance. The Company shall provide information about any data management not described in this guide prior to the particular data management process.

The Company shall only manage personal data for pre-determined purposes, for the necessary period of time and in order to exercise its rights and fulfil obligations. The Company shall only manage such personal data that are indispensable and suitable for fulfilling the objective of the particular data management activity.

Legal statements containing the agreement of minors under sixteen years of age shall not be valid unless agreed or subsequently approved by the statutory guardian of such minors.

If the Company uses the received data for any other purpose than the original purpose of data collection, the Company shall inform the data subjects in each case and ask for their specific, prior consent and/or shall provide an opportunity for them to disallow such usage.

Personal data communicated to the Company during the data management process shall only be disclosed to such persons contracted or employed by the Company entrusted with duties in relation to the given data management process.

## **II. Definitions**

Data subject: any specific natural person identified or identifiable (directly or indirectly) based on the personal data;

Personal data: any data that can relate to the data subject - especially the data subject's name, identification number, as well as one or more pieces of information characteristic of their physical, physiological, mental, economical, cultural or social attributes - and any such conclusions regarding the data subject that can be drawn from such data;

Special data: personal data regarding racial origin, nationality, political opinion or party affiliation, religious or other philosophical convictions, advocacy organisation membership and sexual activities, as well as personal data concerning health conditions and addictions, and personal data on prior criminal activity;

Consent: voluntary and specific expression of the data subject's intention, which is based on proper information and by which the data subjects provide a clear and unambiguous consent to managing their personal data comprehensively or for particular operations;

Objection: a statement by the data subjects in which they object to the management of their personal data and request the termination of data management and/or the deletion of the data managed;

Data Controller: the natural or legal persons or organizations not having a legal personality, who or which determine the purpose of data management on its own or together with others, and make and carry out the decision regarding data management (including the equipment used), or have the data processor entrusted by them to carry out such decisions;

Data management: regardless of the procedure applied; any operation or the whole of operations performed on data, specifically including the collection, recording, systematization, storage, modification, application, query, transfer, publication, harmonisation or linking, blockage, deletion and destruction of data, as well as the prevention of the further usage of such data, photographing, audio or visual recording, as well as the recording of physical attributes suitable for the identification of a person (e.g.: finger- or palm prints, DNA samples, iris scans);

Data transfer: rendering data accessible for certain third parties;

Publication: rendering data accessible for the general public;

Data deletion: rendering data unrecognisable in such a manner that their restoration is no longer possible;

Tagging data: applying an identifying mark to the data in order to distinguish them;

Data blocking: applying an identifying mark to the data in order to block their management for a defined period of time or for good;

Data processing: performing any technical tasks related to data management operations, regardless of the method and equipment applied for the performance of such operations as well as of the place of application, provided that the tasks are performed in terms of data;

Data processor: natural or legal persons and/or organizations not having a legal personality, who or which perform data processing activities based on their contract with the data controller - including contracts concluded pursuant to legal provisions;

Third party: natural or legal persons and/or organizations without a legal personality, who or which are not identical with the data subject, the data controller or the data processor.

### **III. Data management**

#### ***III.1. Using hotel services***

The management of any data related to the data subject and the provision of services are based on voluntary consent, with the purpose of such data management to provide services and/or maintain contact. The Company shall preserve the personal data described in this article (excluding the exceptions defined in the paragraphs) for the period of time defined in the provisions of the relevant tax and accounting laws, and shall delete them after that period.

In the case of particular services, additional data can be provided in the comments section, which allows for a complete assessment of the Guests' needs. Making room reservations and using other services, however, shall not depend upon the provision of such additional data.

Guests may also sign up for the newsletter in the course of using each service. Data management related to the newsletter is provided for in Article III.7.

##### **III.1.1. Room reservations**

In the case of online, personal (paper-based) or phone reservations, the Company requests/can request that the Guest makes the following data available:

- title (not required)
- first name,
- last name;
- address (address, town, post code, country)
- e-mail address;
- phone number;
- mobile phone number (optional)
- type of credit card / debit card;
- number of credit card / debit card,
- name of credit card / debit card holder;
- expiry date of credit card / debit card;
- CVC/CVV code of credit card / debit card (in case of MasterCard: Card Validation Code(CVC2), in case of Visa International: Card Verification Value (CVV2) .)
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If you have any further questions regarding the management of data related to room reservations, please send your enquiry to [info@hotelchesscom.hu](mailto:info@hotelchesscom.hu).

### III.1.2. Hotel registration cards

Upon using hotel services, Guests shall fill in a hotel registration card, in which they give their consent to the Company managing the data they are obliged to provide. The Company shall manage such data in order to fulfil its obligations prescribed in the relevant legal regulations (particularly regarding the laws related to immigration control and tourism tax) as well as to verify the completion of services and/or to identify the Guests for as long as required by the competent authority to manage the fulfilment of obligations as defined in the given laws:

- first name and surname
- address
- citizenship (exclusively for statistical purposes, with the managed data not able to be traced back to the specific person)
- place and date of birth.
- 

The law prescribes the management of the following data with regard to citizens of third countries:

- natural personal identification data, and additionally,
- identification data of the travel document (passport)
- address of the hotel
- beginning and ending date of the hotel stay
- visa number, certificate of registration,
- time and place of entry into the country.

Citizens of third countries: Apart from Hungarian citizens, all persons who are not citizens of a member state of the European Economic Area, including displaced persons.

Member states of the European Economic Area are:

- member states of the European Union;
- Iceland, Liechtenstein and Norway as participating member states,
- as well as Switzerland, as a state with similar legal status.
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Providing the required data by the Guests is a precondition for using hotel services.

By signing the registration card, Guests consent to the Company managing and/or archiving the personal data provided by filling in the registration card in order to verify that the contract was concluded and/or performed, as well as to possibly enforce claims against the deadline specified above.

Guests may also sign up for the Company's newsletter by providing their e-mail address in the registration card. In other matters, the provisions in III.7. shall govern the management of newsletters.

If you require further information concerning the data managed in relation to the registration card, please send your questions to [info@hotelchesscom.hu](mailto:info@hotelchesscom.hu).

### **III.1.3. Bank card data**

For room reservations, the Company can only use the given bank card, credit card and bank account data to such an extent and period of time as necessary for the exercise of rights and fulfilment of obligations. Data is handled by the Company's contractual bank partners. Information about their data handling policies can be found on the websites of the competent Bank ( OTP –[www.otp.hu](http://www.otp.hu)).

Guests can receive further information on the management of bank card data by the company's individual sub-systems upon email request to [info@hotelchesscom.hu](mailto:info@hotelchesscom.hu).

### **III.2. Surveillance cameras**

The Company operates surveillance cameras in the area of the hotels operated by the Company in order to ensure the security of Guests and their property. Camera surveillance is indicated by a pictogram and a warning sign with text.

The purpose of camera surveillance is the protection of property. More specifically, the purpose is to protect equipment with significant value as well as the personal valuables of Guests regarding detecting breaches of the law and catching perpetrators in the act, and the prevention of such criminal acts cannot be done in any other way, and/or there is no other method of presenting evidence.

You can receive more information about data management in relation to the camera system in each hotel.

### **III.3. Newsletter**

The Company shall not send newsletters to natural persons unless consented to by the data subject. The data subjects consent to the Company sending electronic newsletters to their e-mail address by providing an address in the course of signing up for the newsletter (at the website, via e-mail or in print). By providing their address, the data subjects consent to having promotional material sent to them.

The Company shall store the provided personal data on a special list, separated from data handed over to the Company for other purposes. This list shall only be accessible to the Company's authorized personnel and data processors. The Company shall not disclose the list or data to any third party and/or unauthorized parties, and shall take all security measures to prevent any unauthorized person from viewing them.

The purpose of data management in relation to sending newsletters is to provide comprehensive, general or customized information to the addressee regarding the Company's latest special offers.

The Company shall only manage the personal data collected for this purpose for as long as the Company wishes to inform the data subjects via the newsletter and/or until the data subjects unsubscribe from the newsletter.

The Company reviews the newsletter list every five years and requests a confirmation of consent to the newsletter after five years. Within 30 (Thirty) days after the delivery of such e-mails, the Company shall delete the data of all data subjects that have not confirmed their consent to the newsletter.

Guests may subscribe to the newsfeed posted on the Facebook wall by clicking "like" and can also unsubscribe there by clicking "dislike" and/or can delete the undesired newsfeed from their walls with the help of wall settings.

The Company may send promotional materials by mail without the prior consent of the data subjects as long as the Company provides an opportunity to prohibit further promotional materials.

#### ***III.4. Facebook page***

The Company and the hotels can also be contacted individually via Facebook.

The purpose of data management is to share the contents of the website of the Hotels. Guests may reserve rooms, participate in prize drawings and learn about the latest special offers via the Facebook page.

By clicking "like" on the Company's Facebook page, the data subjects consent to the Company posting its news and offers on the data subjects' wall.

The Company also publishes photos/videos about various events/hotels/fitness clubs/restaurants etc. on its Facebook page. Unless it is a photo of a group of

people, the Company shall always request the prior written consent of the data subjects before publication.

You can find further information about the data management of the Facebook page in the data protection guidelines and rules at [www.facebook.com](http://www.facebook.com)

### ***III.5. Website traffic data***

#### ***III.5.1. References and links***

The Company's website may contain links that are not operated by the Company, and are only there to inform visitors. The Company has no influence whatsoever on the content and security of the websites operated by partner companies, and therefore it is not responsible for them either. Before providing your data in any form at the given site, please review the data protection statements and data management guidelines of the websites you visit.

#### ***III.5.2. Analytics. cookies***

In order to monitor its websites, the Company uses an analytical tool (Google Analytics) which prepares a data string and tracks how the visitors use the Internet pages. When a page is viewed, the system generates a cookie in order to record the information related to the visit (pages visited, time spent on our pages, browsing data, exits, etc) but these data cannot be linked to the visitor's person. This tool is instrumental in improving the ergonomic design of the website, creating a user-friendly website and enhancing the online experience for visitors. The Company also uses Google Analytics Advertising Features like Remarketing with Google Analytics and Google Display Network Impression Reporting.

The Company does not use the analytical systems to collect personal information. Most Internet browsers accept cookies, but visitors have the option of deleting or automatically rejecting them. Since all browsers are different, visitors can set their cookie preferences individually with the help of the browser toolbar. You might not be able to use certain features on our website if you decide not to accept cookies.

#### ***III.5.3. Remarketing codes***

We use remarketing codes to log when users view specific pages, allowing us to provide targeted advertising in the future. Visitors to the website may disable cookies that provide remarketing codes through the appropriate settings on the specific browser used.

### ***III.6. Contact***

The Company can be contacted via e-mail. The Company shall manage the messages until the given request/question is fulfilled/answered, then, after the



request/question is closed, it archives such e-mails and stores them for 5 (five) years.

## **IV. Data security**

### IV. 1. SSL system

The Company uses SSL cryptography on its websites for online reservations. Any information shared by the data subject with the Company shall be encrypted automatically and be protected when transferred through the network. When the information is received by our server, it is decoded by using an individual private key. SSL enables the browser to connect to the website and establish a secure communication channel in a transparent manner. SSL is the most widely used and most successful cryptographic system. In order to use the system, the data subjects simply need to verify their browsers' compatibility.

### IV. 2. Other security-related activities

The Company shall ensure transparency to control and establish how and what personal data are transferred by applying data transferring devices, who and when entered which data into the system, and shall also make sure that the system can be restored in the case of a failure. Reports are generated with regard to errors occurring in the course of automated processing.

The Company shall manage personal data confidentially, and shall not disclose them to unauthorized persons. The Company shall particularly protect personal data from unauthorized access, modification, transfer, publication, deletion or destruction as well as from accidental destruction, harm and inaccessibility due to modification of the applied technology. The Company shall take all security measures in order to ensure the technical protection of personal data.

## **V. Data transfer**

In order to verify the legality of data transfer and inform the data subjects, the Company shall keep a data transfer log containing the time of transfer of the managed personal data, the legal basis and addressee of data transfer as well as the definition of the scope of the transferred personal data, and any data defined in the rule of law prescribing data management.

The Company reserves the right to hand over the managed personal data without the specific consent of the data subject to the competent authorities and courts in cases defined in the law, upon request from the authorities and courts.

## **VI. Data processors**

You can request the specific list of the Company's data processors by sending an e-mail to [info@hotelchesscom.hu](mailto:info@hotelchesscom.hu) or by contacting the company's employee responsible for data protection via their contacts specified in Article I. Such requests shall be fulfilled in writing by the Company within 30 (Thirty) days.

## **VII. Rights and legal remedies**

### VII.1. Providing information

Upon requests sent by the data subjects to the e-mail addresses in each chapter or addressed to the Company (Chesscom Kft. 1191 Budapest, Báthory utca 38.), the Company shall provide information regarding the particular subject's data managed by the Company and/or processed by the data processors entrusted by the Company; the source of such data; the purpose, legal basis and duration of the data management; the names and addresses of data processors as well as their activities related to data management; and (in the case of a transfer of the data subject's personal data) the legal basis and recipient of data transfer. Such information shall be provided within 25 (twentyfive) days, free of charge once a year for identical data, and for a fee for all additional requests.

If the provision of information is denied, the Company shall inform the data subject in writing as to which provision of which law was the legal basis to deny the information, and also inform the data subject regarding options for legal remedy.

### VII.2. Corrections

If the personal data are incorrect, and the correct data are available to the Company, it shall correct such personal data.

The Company shall inform the data subject regarding the correction as well as all parties that may potentially have received the data from the Company for data management purposes. Such notice is omissible if the rightful interest of the data subject is not violated in terms of the purpose of data management.

Corrections upon request, deadline for administration and legal remedy are governed by Article VII.1.

### VII.3. Deletion and blocking, objection

Cases of deletion and blocking of personal data and objections against data management are governed by the relevant provisions of the Data Protection Act in Sections 17 - 21.

The company shall provide information on the legal regulations laid out in this paragraph upon requests sent to [info@hotelchesscom.hu](mailto:info@hotelchesscom.hu)

#### VII.4. Judicial redress

If their privacy rights are breached, data subjects may file a lawsuit against the Company. The court procedure shall be governed by provisions in Section 22 of the Data Protection Act, and the First Book, Chapter Three, Title XII (Sections 2:51 - 2:54) of Act V of 2013 concerning the Civil Code, and other relevant legal provisions.

The company shall provide information on the legal regulations laid out in this paragraph upon requests sent to [info@hotelchesscom.hu](mailto:info@hotelchesscom.hu)

#### VII.5. Compensation and injury claims

If the Company causes injury or violates the subject's privacy rights through handling the subject's data in an unlawful manner or through violating its data security requirements, then the affected party may demand an injury claim from the Company.

The data controller shall be exempt from liability for the damage caused and from its obligation to compensate an injury claim, if it can prove that the damage or violation of the privacy rights of the affected party was caused by an unavoidable force falling outside the scope of data management.

The Company shall be exempted from liability and its obligation to compensate an injury claim, if it can prove that the damage or violation of the privacy rights of the affected party was caused by an unavoidable force outside the scope of data management. The damage may not be compensated and an injury claim may not be demanded, if it was due to the wilful or grossly negligent misconduct of the damaged party.

### **VIII. Miscellaneous provisions**

The Company reserves the right to modify this Guide, of which it will notify the affected data subjects.

The Company shall not assume liability for the accuracy of data provided by website visitors or Guests.

With regard to data protection issues, you can request the assistance of the local Office for personal data protection

**Hungary - Hungarian National Authority for Data Protection and Freedom of Information**

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