

# Privacy Notice

## Introduction

This Privacy Notice applies to the processing of personal data carried out by the **Data Controller** in connection with the use of the website [www.appartman.hu](http://www.appartman.hu).

For information regarding any other processing of personal data carried out by the Data Controller outside the **appartman.hu** system, please contact the Data Controller using the contact details provided below.

The website is operated by **Appartman PMS Technologies Ltd.** (Tax No.: 27441792-2-05; Registered Office: 3557 Bükkszentkereszt, Dózsa Street 2, Hungary), which acts as the **Data Processor**.

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## Data Controller

The Data Controller's details are as follows:

**Name of the Data Controller:**

Gombos Anett

**Contact details for exercising rights under the GDPR:**

Gombos Anett  
Veléte Hill 1030  
8281 Szentbékállá  
Hungary

E-mail: [info@kalibirtok.hu](mailto:info@kalibirtok.hu)

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## Processing of Guests' Personal Data for Accommodation Reservations

### Purpose of Processing

The purpose of the processing is:

**To provide accommodation reservation and accommodation services.**

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# Categories of Data Subjects and Personal Data Processed

## Data Subjects

Guests making an accommodation reservation.

## Personal Data Processed

The Data Controller processes the following personal data:

- Full name
- E-mail address
- Telephone number
- Country
- Postal code
- City
- Requested additional services
- Number of guests
- Requested arrival and departure dates
- Room type
- Booking amount
- Comments or special requests

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## Legal Basis for Processing

The legal basis for processing is:

**Performance of a contract pursuant to Article 6(1)(b) of the General Data Protection Regulation (EU) 2016/679 (GDPR)**, where processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract.

### Reason for processing

The processing of reservation data is necessary in order to prepare and conclude the accommodation service agreement.

### Special Categories of Personal Data

No special categories of personal data are processed.

Accordingly, the conditions set out in **Article 9(2) GDPR** are not applicable.

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## Data Retention Period

Personal data will be retained for **five (5) years** following the termination or unsuccessful conclusion of the accommodation service agreement, in accordance with the general limitation period established by **Act V of 2013 on the Hungarian Civil Code**.

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## Other Information

### Consequences of failing to provide personal data

If the requested personal data is not provided, it will not be possible to make an accommodation reservation.

### Is the provision of personal data mandatory?

Yes. Providing the required personal data is a contractual requirement and a prerequisite for entering into the accommodation service agreement.

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## Recipients of Personal Data

The following Data Processor participates in the processing of personal data:

### **Appartman PMS Technologies Ltd.**

Tax No.: 27441792-2-05

Registered Office: 3557 Bükkszentkereszt, Dózsa Street 2, Hungary

Website: [www.appartman.hu](http://www.appartman.hu)

The Data Processor operates the [www.appartman.hu](http://www.appartman.hu) reservation system and stores the personal data specified in this Privacy Notice on behalf of the Data Controller.

No joint controllers are involved in this processing activity.

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## Regular Transfers of Personal Data

Personal data collected through the website may be transferred to:

### **Hotjar Ltd.**

Level 2, St. Julians Business Centre

3 Elia Zammit Street

St. Julians STJ 1000

Malta

The transfer is carried out solely for the purpose of using **Hotjar web analytics services**, including the processing of technical and usage data (such as IP address, client device information and user behaviour).

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## Automated Decision-Making

The Data Controller does **not** carry out automated decision-making or profiling in relation to this processing activity.

## Protection of the Rights of Data Subjects

The Data Controller facilitates the exercise of the Data Subject's right to information under Articles 13 and 14 of the GDPR by publishing this Privacy Notice electronically.

The Data Controller shall make the electronic version of this Privacy Notice available at the time the personal data are collected or during the first contact with the Data Subject. Upon request, the Data Subject may also receive a printed copy.

In addition, Data Subjects may request detailed information regarding the processing of their personal data using the contact details provided above and may submit requests concerning the exercise of their rights.

In addition to the right to information provided for in Article 13 of the GDPR, Data Subjects are entitled to the following rights. Unless an extension is justified due to the complexity or number of requests, the Data Controller will respond to requests within **one month** of receipt.

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### a) Right of Access

Pursuant to **Article 15 of the GDPR**, the Data Subject has the right to obtain confirmation from the Data Controller as to whether personal data concerning him or her are being processed and, where that is the case, access to the following information:

- the purposes of the processing;
- the legal basis for the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the period for which the personal data will be stored, or the criteria used to determine that period;
- the rights available to the Data Subject and the available legal remedies;
- whether automated decision-making, including profiling, is carried out and, if so, meaningful information about the logic involved and the significance and envisaged consequences of such processing.

Under **Article 15(4) GDPR**, the Data Subject is entitled to receive **one free electronic copy** of the personal data undergoing processing.

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## **b) Right to Rectification**

Under **Article 16 GDPR**, the Data Subject has the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data concerning him or her.

The Data Subject also has the right to have incomplete personal data completed.

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## **c) Right to Erasure ("Right to be Forgotten")**

Under **Article 17 GDPR**, the Data Subject has the right to request the erasure of personal data where:

- consent has been withdrawn and no other legal basis applies;
- the processing is unlawful;
- erasure is required to comply with a legal obligation under Union or Member State law;
- the personal data are no longer necessary for the purposes for which they were collected;
- the Data Subject has exercised the right to object and there are no overriding legitimate grounds for processing;
- the personal data were processed for direct marketing purposes and the Data Subject objects to such processing.

The Data Controller may refuse to erase personal data where its retention is required by applicable law or where another legal obligation requires continued processing.

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## **d) Right to Restriction of Processing**

Pursuant to **Article 18 GDPR**, the Data Subject has the right to obtain restriction of processing where one of the following applies:

- the accuracy of the personal data is contested;
- the processing is unlawful and the Data Subject opposes erasure, requesting restriction instead;
- the Data Controller no longer needs the personal data for the purposes of processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims;

- the Data Subject has objected to the processing pending verification of whether the legitimate grounds of the Data Controller override those of the Data Subject.
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## e) Right to Data Portability

Pursuant to **Article 20 GDPR**, where processing is based on the Data Subject's consent or on the performance of a contract and is carried out by automated means, the Data Subject has the right to receive the personal data concerning him or her in a **structured, commonly used and machine-readable format**.

Where technically feasible, and at the request of the Data Subject, the Data Controller shall transmit the personal data directly to another data controller designated by the Data Subject.

The right to data portability does not require controllers to adopt or maintain technically compatible processing systems.

Where compliance with a request for data portability would adversely affect the rights and freedoms of others, including trade secrets or intellectual property rights, the Data Controller may refuse the request to the extent necessary to protect those rights.

The right to data portability does not apply where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

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## f) Automated Decision-Making and Profiling

Pursuant to **Article 22(3) GDPR**, where automated decision-making, including profiling, is carried out, the Data Subject has the right to:

- obtain human intervention;
- express his or her point of view;
- contest the decision.

**At present, the Data Controller does not carry out automated decision-making or profiling.**

## g) Right to Object

Pursuant to **Article 21 of the GDPR**, the Data Subject has the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data where such processing is:

- necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller (Article 6(1)(e) GDPR); or
- based on the legitimate interests pursued by the Data Controller or by a third party (Article 6(1)(f) GDPR).

Where the Data Subject objects to the processing, the Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject, or where the processing is necessary for the establishment, exercise or defence of legal claims.

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## **Right to Legal Remedies**

### **a) Contacting the Data Protection Officer**

The Data Subject may contact the Data Controller's Data Protection Officer at any time if he or she has any questions or complaints concerning the processing or protection of personal data or the exercise of data protection rights.

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### **b) Right to Lodge a Complaint with the Supervisory Authority**

Without prejudice to any other administrative or judicial remedy, every Data Subject has the right to lodge a complaint with the competent supervisory authority if he or she considers that the processing of personal data relating to him or her infringes the GDPR or applicable data protection legislation.

In Hungary, the competent supervisory authority is:

#### **Hungarian National Authority for Data Protection and Freedom of Information (NAIH)**

**Address:**

1055 Budapest, Falk Miksa utca 9–11  
Hungary

**Postal Address:**

1363 Budapest, Pf. 9  
Hungary

**Telephone:**

+36 1 391 1400

**E-mail:**

ugyfelszolgalat@naih.hu

**Website:**

<https://www.naih.hu>

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## **c) Right to an Effective Judicial Remedy**

Without prejudice to any available administrative or non-judicial remedies, including the right to lodge a complaint with the supervisory authority, every Data Subject has the right to an effective judicial remedy where he or she considers that his or her rights under the GDPR have been infringed as a result of the processing of personal data.

Proceedings may be brought before the competent court having jurisdiction over the registered office of the Data Controller.

Alternatively, the Data Subject may initiate legal proceedings before the competent court of his or her place of residence or habitual residence, in accordance with the applicable provisions of the GDPR and Hungarian law.

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## **Closing Statement**

This Privacy Notice has been prepared in accordance with the provisions of the **General Data Protection Regulation (EU) 2016/679 ("GDPR")** and the applicable laws of Hungary governing the protection of personal data.

The Data Controller reserves the right to amend this Privacy Notice where necessary to comply with changes in applicable legislation or data processing practices.