

The Three Corners Downtown Edition Hotel****

Privacy Policy – Data Protection Guide

1. Preamble

1. The owner of The Three Corners Downtown Edition Hotel**** (hereinafter referred to as Hotel) as Data Controller hereby draws the attention of its all customers, Guests, as well as visitors (hereinafter referred to collectively as Guest(s) or Data subject(s)) of the website that if you want to be the user of the website, or wishes to be the customer of the Data controller, then carefully read the present Data Protection Guide, and the General Terms and Conditions.
2. The Three Corners Downtown Edition Hotel**** is dedicated to protecting the privacy of the Data subject. This Data Protection Guide explains the Data Controllers' policies and practices regarding to the personal information it manages.

2. Data Controller

1. According to the present Data Protection Guide, the Data Controller is:
 - a) the owner of The Three Corners Downtown Edition Hotel****, CLA Operations Kft.
 - i. Address of the Hotel: 1051 Budapest, Október 6. utca 20.
 - ii. company reg. number: 14-09-318683
 - iii. taxnumber: 27441493-2-14
 - iv. phone: +36 1 737 7210
 - v. e-mail: sales-downtownhotel@threecorners.hu
 - vi. website: <https://threecorners.com/budapest/the-three-corners-downtown-edition-hotel/>
 - vii. social networking website: <https://www.facebook.com/ttcdowntownhotel>
 - viii. social networking website: <https://www.instagram.com/ttcdowntownhotel/>
 - ix. general manager: Mr. János Gonda
 - b) every employee of CLA Operations Kft. - The Three Corners Downtown Edition Hotel

3. The aim of the Data Protection Guide

1. The Data Controller respects the personal rights of its users, visitors and Guests, hence it created this DPG which is available in electronic format at the Data Controller's website as well as in print format in the Hotel.

2. Therefore the aim of the DPG is to regulate the data management procedures, methods to protect the privacy of the Data subjects.
3. The Data Controller hereby states that it observes the provisions of
 - a) the Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: "GDPR"),
 - b) the Act 112 of 2011 on the rights for information management and freedom of information (hereinafter: "Data Protection Act") and
 - c) other Hungarian acts and rules.

4. Definitions

1. Data subject: an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, primarily data subjects are the visitors of the Hotel, the Guests and the Contracting Parties.
2. Guest means an individual that uses accommodation. Guests also include those persons that are accommodated together with such Party (e.g. family members, friends etc.).
3. Contracting party means the natural person as party in the Accommodation Contract (see GTC).
4. Hotel means The Three Corners Downtown Edition Hotel**** owned by the Data Controller.
5. GTC means the General Terms and Conditions of Accommodation Contract, available on the website and at the reception desk.
6. DPG means the present Data Protection Guide, available on the website and at the reception desk.
7. Personal data means any information relating to an identified or identifiable natural person ('data subject');
8. 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;

9. 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;
10. 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 Controller is the Data controller.
11. 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);
12. Data transfer: rendering data accessible for certain third parties;
13. Publication: rendering data accessible for the general public;
14. Data deletion: rendering data unrecognisable in such a manner that their restoration is no longer possible;
15. Tagging data: applying an identifying mark to the data in order to distinguish them;
16. Data blocking: applying an identifying mark to the data in order to block their management for a defined period of time or for good;
17. 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;
18. Data processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller;
19. Third party means a natural or legal person, public authority, agency or body other than the Data subject, Data Controller, Data Processor and persons who, under the direct authority of the Data Controller or Data Processor, are authorised to process personal data.

5. The scope of the DPG

1. The DPG applies for all data managements in or related to the Hotel executed by the Data Controller.
2. According to the section 1, the present DPG regulates the methods of the data managements.
3. The personal scope of the DPG is: the Data Controller and the Data subject, every person whose rights or legitimate interests are affected by data management.
4. The present DPG valid from 01. February 2022.
5. Special, unique conditions do not constitute part of the indicated GTC, but do not exclude the drawing up of special agreements with tour operators and organisers from time to time with conditions adjusted according to the type of business.

6. Rights

1. Data subjects have rights related to the data and data management.
2. Data subjects may enforce their rights by sending request(s) to the Data controller's postal (1051 Budapest, Október 6. utca 20.) or e-mail address (sales-downtownhotel@threecorners.hu), by phone +36 1 737 7210 or personally, or any available contact form.
3. Upon requests, the Data controller shall immediately take the necessary steps based on the request and inform the Data subjects about the taken steps within 25 days.

a) Right to information

1. Upon requests sent by the Data subjects to the e-mail addresses in each chapter or addressed to the Data controller, the Data controller shall provide information regarding the particular subject's data managed by the Data controller; 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 days, free of charge once a year for identical data, and for a fee for all additional requests.

2. If the provision of information is denied, the Data controller 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.

b) Corrections

1. If the personal data are incorrect, and the correct data are available to the Data controller, it shall correct such personal data.
2. The Data controller shall inform the Data subject regarding the correction as well as all parties that may potentially have received the data from the Data controller 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.
3. Corrections upon request, deadline for administration and legal remedy are governed by the present DPG

c) Right to erasure

1. The Data subject shall have the right to obtain from the Data controller the erasure of personal data concerning him or her without undue delay.
2. Where the Data controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the Data controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the Data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

d) Right to restriction of processing

1. The Data subject shall have the right to obtain from the Data controller restriction of data processing.

e) Right to data portability

1. The Data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a Data controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the controller to which the personal data have been provided, where:

- a) the processing is based on consent/contract pursuant and
 - b) the processing is carried out by automated means.
2. Data controller do not use automated data management, therefore the Data subject can not enforce her/his right.

f) Right to object

1. The Data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling.

g) Automated individual decision-making, including profiling

1. The Data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
2. Data controller do not use automated individual decision-making, or profiling, therefore the Data subject can not enforce her/his right.

7. Remedy

1. If their privacy rights are probably breached or breached, Data subjects may request an investigation from the Hungarian National Authority for Data Protection and Freedom of Information. The contact details:
- a) H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.
 - b) Phone: +36 -1-391-1400
 - c) Fax: +36-1-391-1410
 - d) E-mail: privacy@naih.hu
2. If their privacy rights are breached, data subjects may file a lawsuit against the Data controller. The court procedure shall be governed by the Data Protection Act, the Civil Code, and other relevant legal provisions.
3. The Data Controller shall provide information on the legal regulations laid out in the Acts upon requests sent to fo-downtownhotel@threecorners.hu.

8. Compensation and injury claims

1. If the Data controller causes injury or violates the Data subject's privacy rights through handling the Data 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 Data controller.

2. 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.
3. The Data Controller 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 willful or grossly negligent misconduct of the damaged party.

9. Principles

1. Personal data shall be:
 - a) processed lawfully, fairly and in a transparent manner in relation to the Data subject ('lawfulness, fairness and transparency');
 - b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
 - c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
 - d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
 - e) kept in a form which permits identification of Data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes ('storage limitation');
 - f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

2. The Data controller shall be responsible for, and be able to demonstrate compliance with section 1 ('accountability').

10. Legal basis

1. The legal basis of the personal data management is the following. Processing shall be lawful only if and to the extent that at least one of the following applies:
 - a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
 - b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
 - c) processing is necessary for compliance with a legal obligation to which the controller is subject;
 - d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
 - e) 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 controller;
 - f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
2. Consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the Data subject's agreement to the processing of personal data relating to him or her, such as by a written statement, including by electronic means.
3. Guest shall expressly consent to this DPG by
 - a) accepting the DPG in an electronic way, or in writing or
 - b) using the services of the website or of the Data Controller.
4. If the management or processing of personal data based on mandatory by law, then the relevant rules are determining the purpose, the period of time, the handled data, the rights and obligations.
4. The Data controller shall only manage personal data for pre-determined purposes, for the necessary period of time and in order to exercise its rights and fulfill obligations. The Data controller shall only manage such personal data that are indispensable and suitable for fulfilling the objective of the particular data management activity.
5. If the Data controller uses the received data for any other purpose than the original purpose of data collection, the Data controller 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.

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

11. The period of data management

1. Data controller shall manage the data until
 - a) the purpose of the data management is fulfilled;
 - b) the withdrawal of the voluntary consent;
 - c) erasing the personal data.

12. Data management - Using hotel services

1. The management of any personal 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.
2. The term of the management of the data shall terminate upon the withdrawal of the consent of the relevant Data subject. Such declaration on the withdrawal of the consent to data management shall be sent via mail to the registered seat (1051 Budapest, Október 6. utca 20.) or electronically to sales-downtownhotel@threecorners.hu.
3. Providing the required data by the Guests is a precondition for using hotel services.
4. 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.
5. Guests consent to the Data controller managing and/or archiving the personal data in order to
 - a) verify that the contract was concluded and/or performed, possibly enforce a claim and/or;
 - b) contact Guest in the term of the management of the data.
6. If you have any further questions regarding the management of data related to room reservations, please send your enquiry to: sales-downtownhotel@threecorners.hu.

13. Data management – Request for information

1. In the case of information request, the Data controller requests/may request that the Guest makes the following data available with the following aim:

name*	identification
phone number	contact
e-mail address*	contact
question*	answer

2. Data subject: Any natural person who contacts the Data Controller and requests information from the Data Controller.
3. Purpose of the data management: to provide relevant information to the Data subject.
4. Period of data management: the purpose of the data management is fulfilled.

14. Data management – Request for quotation

1. In the case of quotation request, the Data controller requests/may request that the Guest makes the following data available with the following aim:

name*	identification
phone*	contact
e-mail address*	contact
note*	answer
arrival date*	necessary for quotation
departure date*	necessary for quotation
number of adults	necessary for quotation
number of children (0-3 yrs)	necessary for quotation
number of children (3-10 yrs)	necessary for quotation
number of children (10-14 yrs)	necessary for quotation
chosen special offer/package*	necessary for quotation
roomtype*	necessary for quotation

2. Data subject: Any natural person requesting an offer from the Data Controller.
3. Purpose of the data management: to provide relevant quotation to the Data subject.
4. Period of data management: the purpose of the data management is fulfilled.

15. Data management – Room reservation and special offer

1. In the case of room reservations and special offers, the Data controller requests/may request that the Guest makes the following data available with the following aim:

name*	identification
phone*	contact
e-mail address*	contact
note*	answer
arrival date*	necessary for quotation
departure date*	necessary for quotation
number of adults	necessary for quotation
number of children (0-3 yrs)	necessary for quotation
number of children (3-10 yrs)	necessary for quotation
number of children (10-14 yrs)	necessary for quotation
chosen special offer/package*	necessary for quotation
roomtype*	necessary for quotation

2. Data subject: Any natural person who reserves a room in the Hotel owned by the Data Controller.
3. Purpose of the data management: to provide the room reservation to the Data subjects, and to contact Data subjects.
4. Period of data management: the duration of the data processing lasts until the expiration of the enforceability of the rights and obligations deriving from the legal relationship in which the Data controller manages the personal data (5 years), in relation to data on invoices which invoices confirm the accounting records, the duration of the data processing is based on Article 169 (2) of Act 100 of 2000 (8 years).

16. Data management - Hotel registration cards

1. Upon using hotel services, Data Subjects shall fill in a hotel registration card, in which they give their consent to the Data controller managing the data that are obliged to provide. The managed data and aims are:

name*	mandatory processing based on law, identification
birth place and date*	mandatory processing based on law, identification
address*	mandatory processing based on law, contacting, base of tourist tax
nationality*	mandatory processing based on law, base of tourist tax, alien policy
phone	contact
e-mail address*	contact

number of passport/ID card*	identification
license plate number	identification of the vehicle
arrival and departure date *	mandatory processing based on law, base of tourist tax
stay purpose	statistics
mark for signing up for newsletter	send newsletter
payment method	statistics, prepare for the payment method

2. Data subject: Any natural person who checks in the Hotel owned by the Data Controller and fills in the hotel registration form.
3. Purpose of the data management: The Data controller shall manage such data in order to fulfill 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 fulfillment of obligations as defined in the given laws.
4. Period of data management: data required by the law, the duration is based on the relevant laws (5 years), in relation to data on invoices which invoices confirm the accounting records, the duration of the data processing is based on Article 169 (2) of Act 100 of 2000 (8 years).

17. Data management - Surveillance cameras

1. The Data controller operates surveillance cameras in the area of the Hotel in order to ensure the security of Guests and their property. Camera surveillance is indicated by a pictogram and a warning sign with text.
2. 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.
3. The floor map and the locations of the cameras marked on it are available at the front office desk and in the nr. IV attachment.

18. Data management - Guest questionnaire, evaluation system

1. As part of the quality assurance process applied by the Data controller, Guests may provide feedback on the services via an online or paper-based Guest questionnaire and/or evaluation system.

- When filling out the questionnaire, Guests may provide the following personal data with the following aim:

name	identification
room number	identification
arrival date	identification
e-mail address	contact
evaluation	quality management
stay purpose	statistics

- Data subject: Every natural person who evaluates the services of the Hotel.
- Providing these data are not obligatory, and merely serve the purpose of an accurate investigation of possible complaints and/or enable the Data controller to respond to the Guest.
- The feedback received in this manner and the data potentially provided by the Guest may not be traced back to the Guest or linked to the name of the Guest, but may be used by the Data controller for statistical purposes.
- Period of data management: the purpose of the data management is fulfilled, in case of a complaint, the duration is 5 years based on the Article 17/A of Act 155 of 1997.

19. Data management – Newsletter

- In the case of newsletter, the Data controller requests/may request that the Guest makes the following data available with the following aim:

name	identification
address	contact

- Data subject: Every natural person who sign up for the newsletter database.
- Newsletter is sent by email to those who explicitly request it.
- The provision of personal data is facultative. The eventual refusal to provide such data will make it impossible to utilize the newsletter service.
- Data subject can unsubscribe from the newsletter by clicking on the unsubscribe link on the end of the newsletter, or by sending request to the Data controller's postal (1051 Budapest, Október 6. utca 20.) address.
- Period of data management: the withdrawal of the voluntary consent.

20. Data management – Credit/Bank card data

1. The Data controller requests/may request that the Data subject makes the following data available with the following aim:

number of credit/debit card	identification for the financial transaction
CVC/CVV code on credit/debit card	identification for the financial transaction
expiry date of credit/debit card	identification for the financial transaction
name of bank holder	identification for the financial transaction

2. Data subject: Every natural person whos gives the credit/bank card data to pay or reserves a service.
3. Purpose of the data management: For room reservations, the Data controller can only use the given debit card, credit card and bank account data to such an extent and period of time as necessary for the exercise of rights and fulfillment of obligations. Data is managed by the Data Controller's contractual bank partners. Information about their data handling policies can be found on the websites of the competent banks.
4. Period of data management: the duration of the data processing lasts until the expiration of the enforceability of the rights and obligations deriving from the legal relationship in which the Data controller manages the personal data (5 years), in relation to data on invoices which invoices confirm the accounting records, the duration of the data processing is based on Article 169 (2) of Act 100 of 2000 (8 years).

21. Data management – Social media

1. The Data controller can also be contacted via social networking sites.
2. The purpose of data management is to share the contents of the website. Guests may request information, quotation, reserve rooms or tables, and learn about the latest special offers.
3. By following the Data controller's pages, the Data subjects consent to the Data controller posting its news and offers on the data subjects' news wall.
4. You can find further information about the data management in the data protection guidelines and rules of the relevant social networking page.

22. Data management - Website traffic data

1. References and link: The Data controller's website may contain links that are not operated by the Data controller, and are only there to inform visitors. The Data controller 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.
2. Analytics, cookies: In order to monitor its websites, the Data controller uses an analytical tool 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 Data controller 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.

23. Data safety

1. The Data controller takes all the measures that can be expected from it for the safety of the stored data, it provides for their guarding at an appropriate level with particular regard to unauthorized access, alteration, forwarding, disclosing, cancellation of destruction as well as to accidental destruction and damaging.
2. The Data controller provides for appropriate technical and organizational measures in order to maintain safety of the stored data.

24. Data management - Data processor

1. The accountant, the guest questionnaire and the newsletter sender systems are the sole Data processor of the Data controller.

25. Data transfer

1. The Data controller has the right to transfer personal data handed over to business partners (compliance assistants) fulfilling the Data controller's obligation related to the Data subjects. Such data transfer may only take

place if the Data subjects have been informed in advance accordingly, upon using the service(s).

2. In order to verify the legality of data transfer and inform the data subjects, the Data controller 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.

26. Miscellaneous rules, governing law, jurisdiction

1. The applicable version of the DPG is continuously available on the website and at the reception desk.

Closed: 01 February 2022., Budapest

CLA Operations Kft / The Three Corners Downtown Edition Hotel
Mr. János Gonda
General Manager

www.threecorners.com