The Three Corners Europe Hotel Management Kft.

Three Corners Lifestyle Hotel ****
Privacy Policy

Introduction

Pursuant to Articles 12-14 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 the GDPR), the operator of **Three Corners** Lifestyle Hotel **** (hereinafter referred to as the Hotel) as data controller (hereinafter: Data Controller) **provides the following information regarding the processing of data by the Controller.**

I. Data and contact details of the data controller

Pursuant to this Privacy Policy, the Data Controller shall:
operated by The Three Corners **Lifestyle** Hotel ****, **The Three Corners Europe Hotel Management Kft.**

- Address of the Hotel: Hőgyes Endre utca 4., 1092 Budapest, Hungary
  Company registration number: 01-09-996387
- Tax number: 24223638-2-42
- Phone: +36 1 610 4700
- E-mail: fo-lifestylehotel@threecorners.hu
- Weboldal: https://threecorners.com/budapest/lifestyle-hotel/
- Social media site: https://www.facebook.com/threecorners lifestyle hotel
- Social media site: https://www.instagram.com/threecorners lifestyle hotel/
- Managing Director: Mr. Didier Cornelius Lambrecht
- Data Protection Officer (DPO) Contact: adatjogvedo@outlook.hu

For the purposes of this Privacy Policy (hereinafter: Privacy Policy), personal data is any information relating to an identified or identifiable natural person (**hereinafter referred to as: 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, a 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). The Data Subjects of the personal data processing under this Privacy Policy are the natural persons who are the client/guest of the Data Controller and the visitors of the Data Controller's website (hereinafter collectively referred to as the Data Subject(s).

The Data Controller respects the privacy rights of its users, visitors and guests, which is why it has created this Privacy Policy (NOTICE), which is available in electronic form on the Data Controller's website and in printed form in the Hotel as well.

II. The main legal regulations relating to data processing under this Privacy Notice and their abbreviations applied in this Privacy Policy:

(a) 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; GDPR)

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b) Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as the "Privacy Act" or "Data Protection Act"), and
c) other relevant Hungarian laws and regulations.
d) Act C of 2000 on Accounting (Accounting Act)
e) Act CL of 2017 on the Rules of Taxation (Art.)
f) Act V of 2013 on the Civil Code (Civil Code)

III. Description of the purposes of data processing, the legal basis of data processing, the scope of the processed data, the duration of data processing

Name and purpose of Data Processing	**Legal basis for data processing (in the case of Article 6(1)(c) or (e) of the GDPR, indication of the exact legal provision)**	**Scope of processed personal data**	**Duration of data processing**
1. <u>Request for information, contact</u>: Request for information from the Data Controller in connection with its services and in all issues that may arise. To provide the data subject with appropriate information and to maintain contact.	According to Article 6 (1) (a) of the GDPR, the consent of the data subject.	• Name • phone number • E-mail address • the content of the question or inquiry	The Data Controller processes personal data until the fulfilment of the request, the response to the request, or the withdrawal of consent.
2. <u>Request for quotation:</u> Request an offer from the Data Controller for the purpose of using the services of the Data Subject.	Article 6 (1) b) of the GDPR is necessary to take steps at the request of the data subject prior to the conclusion of a contract.	• Name • phone number • E-mail address • Request for quotation and content of the offer	The Data Controller stores the personal data until the conclusion of the contract (confirmation of the booking), or in the absence of this, until the rejection of the offer or the booking**.**
3. <u>Room reservation:</u> The Data Subject books a room on the website, by e-mail, by phone, or in person, or in any other way or through another forum. The reservation of the	Article 6(1)(b) of the GDPR: performance of a contract	• surname • First name • phone number • Mobile phone number • Country	Until the termination of the contract/ until the fulfilment of the

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Name and purpose of Data Processing	Legal basis for data processing (in the case of Article 6(1)(c) or (e) of the GDPR, indication of the exact legal provision)	Scope of processed personal data	Duration of data processing
given room is linked to the data subject by that data controller.		• address (postal code, city, public area, house number, floor) • Credit card details • E-mail address • Arrival date • Departure day • Number of nights • Number of people • other questions and requests • Indication of acceptance of the booking conditions • enter a discount code	
4a. <u>Registration and the registration form:</u> Upon arrival, the Data Subject fills in a registration form before occupying the booked room, in which the Data Controller processes the data provided for the purpose of identifying the Guest and fulfilling its legal obligations.	Article 6(1)(c) of the GDPR: fulfilment of a legal obligation (Section 9/H of Act CLVI of 2016, Act C of 1990).	Scope of processed data: • name, birth name • Name of legal representative • mother's name • Gender • the identification data of the person or travel document, in the case of a third-country national, the number of the visa or residence permit, the date and place of entry • Citizenship • Place and time of birth • Arrival Date • Travel Date	The Data Controller processes the personal data until the end of the use of the accommodation service.

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Name and purpose of Data Processing	Legal basis for data processing (in the case of Article 6(1)(c) or (e) of the GDPR, indication of the exact legal provision)	Scope of processed personal data	Duration of data processing
4b. <u>Registration and the registration form:</u> Upon arrival, the Data Subject fills in a registration form before occupying the booked room in order to ensure uninterrupted parking.	According to Article 6 (1) (a) of the GDPR, the consent of the data subject.	• Vehicle registration number • Address	The Data Controller ceases to be used for personal data processing upon departure.
5. <u>Data processing in connection with invoicing:</u> Fulfilment of the invoicing obligation of the Data Controller, as well as the management of the invoices received by the Data Controller in the course of its market orders and the fulfilment of its accounting obligations, on the basis of which the Data Controller is obliged to process the following personal data of the natural person concerned	Article 6(1)(c) of the GDPR: fulfilment of a legal obligation (Act C of 2000, 23/2014 (VI.30.) Decree of the Ministry of National Economy	• Name • Billing and banking information	The Data Controller stores the personal data for 8 years after the issuance and performance of the invoice (Section 169 (1)-(2) of the Accounting Act).
6. <u>Camera system:</u> Cameras are in operation in the hotel area. Property protection related to assets, tools and equipment in the monitored area, as well as personal protection and the prevention of accidents occurring in the area and the exploration of the circumstances of the accidents that occurred, in order to clarify, explore, prove and investigate the (legal) dispute.	Article 6(1)(f) of the GDPR: legitimate interest of the Data Controller	An image of the affected person recorded by the operated camera system.	The personal data will be stored by the data controller for 8 days from the date of the recording and will only be viewed in the event of an unlawful act.
7. <u>Sending newsletters for direct marketing purposes:</u> To provide full information to the data subjects about the latest promotions, events, news, changes or cancellations	Pursuant to Article 6(1)(a) of the GDPR, the consent of the data subject	• Name • E-mail • phone number (Watsupp/Sms)	The data controller processes personal data until the withdrawal of

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Name and purpose of Data Processing	Legal basis for data processing (in the case of Article 6(1)(c) or (e) of the GDPR, indication of the exact legal provision)	Scope of processed personal data	Duration of data processing
of notification services of the Data Controller.			consent (i.e. unsubscribing from the newsletter).
8. <u>Accommodation management software and NTDSC data transfer:</u> The Data Controller is obliged by law to process personal data, which uploads and stores personal data in the accommodation management software. The Data Controller forwards the personal data to the National Tourism Data Supply Centre at the intervals specified in the law.	Article 6(1)(c): fulfilment of a legal obligation. Pursuant to Decree No. 235/2019 (X.15.) Pursuant to Sections 7-8 and Annex 2 I of the Government Decree, the Lodge shall provide the personal data listed in Point I of Annex 2, which personal data shall be uploaded and stored in the accommodation management software referred to in Section 2(5).	As a general rule, the system sends statistical data, but it may be possible to draw conclusions about the data subject from these statistical data, and therefore they qualify as personal data.	For the period specified in the law.
9. <u>Guest questionnaire, evaluation system:</u> As part of the quality assurance process applied by the Data Controller, the data subjects can give their opinion online, through an e-mail-based guest questionnaire or perhaps a guestbook.	Pursuant to Article 6(1)(f) of the GDPR, the legitimate interest of the controller	• Name • room number • Date of arrival • E-mail address • textual evaluation, content of the opinion • reason for choosing a hotel • Purpose of visit	The data controller retains the personal data for 1 year. The date designated for the deletion of personal data is the last day of each calendar year.
10. <u>Enforcement of legal claims, conducting legal proceedings, data processing in connection with the collection of claims:</u> As a general rule, the Data Controller processes personal data for the purpose of enforcing legal claims,	Article 6(1)(f) of the GDPR: legitimate interest of the Data Controller	• Name, • Birth name • mother's name, • place of birth, • date of birth, • personal identification number,	The Data Controller shall store the personal data for 5 years from the termination or performance of the service contract, or until

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Name and purpose of Data Processing	Legal basis for data processing (in the case of Article 6(1)(c) or (e) of the GDPR, indication of the exact legal provision)	Scope of processed personal data	Duration of data processing
conducting legal proceedings, collecting claims, i.e. for the purpose of enforcing its claims, as well as for the purpose of identifying the Data Subject and maintaining contact with him/her.		• Address/Residence	the final termination of the given procedure/collection of the claim.
11. <u>Data processing related to complaints and the notification of claims.</u> Complaints submitted by the Data Subject in connection with the hotel service (consumer protection complaints) shall be assessed and the minutes shall be recorded. The Data Subject may submit a complaint or other claim to the Data Controller in any way.	Compliance with a legal obligation incumbent on the controller pursuant to Article 6(1)(c) of the GDPR (Section 17/A (5) of the Consumer Protection Act). In the event of a complaint, the provision of the above personal data is mandatory on the part of the Data Subject.	• Name • Address • Email address • Content of the complaint, time and method of submission • Date of the minutes • Content of documents forming part of a complaint • Complaint ID • Signature of the keeper of the minutes	It shall be stored for 3 years from the date of the minutes (Section 17/A (7) of the Consumer Protection Act).
12. <u>Chat bot on the website:</u> The purpose of using a chatbot is to increase the guest experience, to respond quickly and efficiently to guests' needs and questions, to provide customer service information, to communicate and keep in touch.	Pursuant to Article 6(1)(a) of the GDPR, the consent of the data subject	• Last name • First name • Email address • Messenger profile picture/ID • Message or conversation content • WebChat: name and e-mail address only	The data controller processes the personal data until the withdrawal of the consent.
13. <u>Use of the guest application:</u> The purpose of data processing is to enhance the hotel guest experience and	Pursuant to Article 6(1)(a) of the GDPR, the consent of the data subject	• surname • First name • phone number	The data controller processes the personal data

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Name and purpose of Data Processing	Legal basis for data processing (in the case of Article 6(1)(c) or (e) of the GDPR, indication of the exact legal provision)	Scope of processed personal data	Duration of data processing
provide comfort functions through the proper operation of the application.		• Mobile phone number • Country • address (postal code, city, public area, house number, floor) • E-mail address • Arrival date • Departure day • Number of nights • Number of people • other questions and requests • Indication of acceptance of the booking conditions • enter a discount code • Credit card details • Invitation Code	until the withdrawal of the consent, but for a maximum of 12 months.
14. <u>Loyalty program for regular guests:</u> To provide a loyalty program for guests, and to provide discounts, benefits or other services or amenities to the guest during registration.	Pursuant to Article 6(1)(a) of the GDPR, the consent of the data subject	• Name, • Email address • Phone number • Date of birth • Country of birth • Nationality • Country • Gender	The data controller stores the personal data until the withdrawal of the consent.
15. <u>To take and publish photos:</u> In order to promote the services of the Data Controller, it should take photographs of its daily operations and eventual events, and publish the recordings on its website and/or social media platforms (Facebook, Instagram, etc.).	Pursuant to Article 6(1)(a) of the GDPR, the consent of the data subject	• Image and video recording (audio)	The Data Controller stores the personal data for 5 years from the date of the recording or until the withdrawal of the consent.

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For each purpose, the legal basis for the processing is Article 6(1)(f) of the GDPR. (data processing necessary for the purposes of the legitimate interests pursued by the Data Controller or a third party).

According to the results of the balancing of interests carried out by the Data Controller in this context:
The Data Controller assesses that the legal basis of each data processing corresponds to the legitimate interest set out in Article 6 (1) f) of the GDPR, considering that it is the legitimate interest of the Data Controller that the objectives are achieved and that the interests or fundamental rights and freedoms of the Data Subjects are not violated in the course of data processing in a way that would override the legitimate interest of the Data Controllers (the specific interests or fundamental rights and freedoms of the Data Subject do not take precedence over the interest).

Legitimate interest exists	The legitimate interest is duly defined, genuine and current, as the data processing is actually necessary for the efficient performance of the Data Controller's business activities.
Data processing is necessary	Data processing is necessary for the realization of legitimate interest, since in the absence of it, the business goal of the Data Controller – to provide its services as efficiently as possible and with the highest satisfaction – would not be achieved.
Data processing constitutes a proportionate restriction with regard to the data subject	In the course of Data Processing, the interests, fundamental rights and freedoms of the Data Subjects are not violated. Compared to the interests of the Data Controller, the interests of the Data Subject do not enjoy a higher level of protection. With regard to the fact that the Data Subject receives the appropriate information about the data processing concerning him or her at the time of data collection, and that the effects of data processing are fully predictable due to the method of data processing, the measure of proportionality in this respect is shifting towards the permissibility of data processing. The proportionality of the restriction is also increased by the fact that the data controller provides the data subject with comprehensive, clear and comprehensible information at the time of data collection about the scope of the personal data processed, the basis, method and time of data processing, and the data subject's rights related to data processing.

With regard to the provisions of Article 21 of the GDPR, the Data Controller expressly calls the attention of the Data Subjects, clearly and separately from any other information, to the attention of the Data Subjects that **each Data Subject has the right to object at any time to the processing of his or her personal data based on Article 6(1)(f) of the GDPR for the purposes of data processing specified in this Policy, on grounds relating to his or her particular situation.**

In this case, the Data Controller may no longer process the personal data, unless the Data Controller proves that the data processing is justified by compelling legitimate grounds that take precedence over the interests, rights and freedoms of the Data Subject, or that are related to the establishment, exercise or defence of legal claims.

IV. Data security measures

The Data Controller undertakes to ensure the security of the personal data it processes. Taking into account the state of science and technology and the costs of implementation, as well as the nature, scope, circumstances and purposes of the processing, as well as the risks to the rights and freedoms of natural persons of varying probability and severity, it shall take the technical and organisational measures and establish the procedural rules to ensure that the data recorded, stored or processed are protected, or prevent their destruction, unauthorized use and unauthorized alteration.

The Data Controller also undertakes to call upon all third parties to whom the data are forwarded or transferred on any legal basis to comply with the requirement of data security.

The Data Controller shall guarantee a level of data security appropriate to the degree of risk, including, inter alia, where applicable:

- pseudonymization and encryption of personal data,
- ensuring the continued confidentiality, integrity, availability and resilience of the systems and services used to process personal data (operational and development security, intrusion protection and detection, prevention of unauthorised access),
- in the event of a physical or technical incident, the ability to restore access to and availability of personal data in a timely manner (prevention of data leakage; vulnerability and incident management);
- a procedure for regularly testing, assessing and evaluating the effectiveness of the technical and organizational measures taken to guarantee the security of data processing (maintaining business continuity, protecting against malicious codes, securely storing, transmitting and processing data, security training of our employees).

When determining the appropriate level of security, the risks arising from the processing of personal data shall be expressly taken into account, in particular from the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

The Data Subject's data is stored on the protected internal servers of the Data Controller, which is protected by the highest IT security standards. Remote access is only possible for a limited number of authorized persons, only through a virtual private network, after authentication. All operations performed by the User and the Service Provider related to data processing involving modifications will be logged. The data will not be copied to any other physical medium.

The Data Controller operates the IT tools used for the processing of the recorded personal data as follows:

Within the scope of its tasks related to IT protection, the Data Controller shall take care in particular:

- Measures to protect against unauthorized access, including the protection of software and hardware devices, as well as physical protection (access protection, network protection);
- Measures to ensure the possibility of restoring data files, including regular backups and separate, secure management of copies (mirroring, backup);
- On the protection of data files against viruses (virus protection);
- The physical protection of data files and the devices carrying them, including protection against fire damage, water damage, lightning strikes and other elemental damage, as well as the restorability of damage caused by such events (archiving, fire protection).

V. Data processors, data transfer:

In order to fully comply with the principle of transparency, the Controller discloses the relevant information related to the Data Processors and the details of the data transfer in Annex I of the data protection notice.

VI. Your (data subject's) rights and the order of their enforcement

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The Data Controller shall inform the Data Subject without undue delay, but within one month of the receipt of the request, of the measures taken in response to the following request at the contact details provided by the Data Controller. If necessary, taking into account the complexity of the application and the number of applications, this deadline may be extended by a further two months. The data controller shall inform the data subject of the extension of the deadline within one month of receipt of the request, indicating the reasons for the delay.

You, as a Data Subject, can exercise your rights below at the following contact details:

Data Subjects may enforce their rights by submitting a request to the Data Controller, which may be sent by post (address: Hőgyes Endre utca 4., 1092 Budapest, Hungary), by e-mail (fo-lifestylehotel@threecorners.hu), by phone (+36 1 610 4700), in person or through any available form of contact.

Your right to information

The Data Controller is obliged to provide the Data Subjects with the following information on data processing at the time of obtaining the personal data, if the personal data originate from the Data Subject:

- the name, contact details and representative of the Data Controller;
- contact details of the Data Protection Officer;
- the purpose of the planned processing of personal data and the legal basis for the processing;
- in the case of data processing based on legitimate interests, the legitimate interests of the Data Controller or a third party;
- recipients of the personal data;
- the duration of the storage of the personal data;
- whether the controller intends to transfer the personal data to a third country or to an international organisation;
- informing about the rights of the Data Subject;
- the right to withdraw consent in the case of data processing based on consent;
- the right to lodge a complaint with a supervisory authority;
- whether the provision of personal data is based on a law, a contractual obligation or a prerequisite for entering into a contract;
- the fact of automated decision-making, including profiling.

The obligation to provide information described above does not have to be fulfilled if the Data Subject already has the information included in these sections.

If the personal data were not obtained from the Data Subject, the Data Controller shall provide the Data Subject with the above information, as well as the following information in addition to them:

1. the categories of Personal Data Covered;
2. the source of the personal data and, where applicable, whether the data originated from publicly available sources.

If the personal data were not obtained from the Data Subject, the obligation to provide information does not have to be fulfilled if:

- - the Data Subject already has the information,
- the provision of information proves impossible or would require a disproportionate effort;
- the acquisition or disclosure of the data is expressly required by the EU law or the Hungarian law applicable to the Data Controller, or
- Personal data must remain confidential on the basis of a professional secrecy obligation imposed by EU or applicable Hungarian law.

Your right of access

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You have the right to receive feedback from the Data Controller as to whether your personal data is being processed and, if such processing is in progress, you have the right to access the personal data and the following information:

- the purposes of the processing;
- the categories of personal data we process about you;
- the recipients or categories of recipients to whom the Personal Data are or will be communicated by the Data Controller, including, in particular, recipients from third countries or international organisations;
- where applicable, the envisaged period for which the personal data will be stored or, if this is not possible, the criteria for determining that period;
- your right to request the Controller to rectify, erase or restrict the processing of personal data concerning you and to object to the processing of such personal data;
- the right to lodge a complaint with a supervisory authority (the National Authority for Data Protection and Freedom of Information in Hungary);
- if the data was not collected from you by the Data Controller, all available information on their source;
- the fact of automated decision-making, including profiling, and, at least in these cases, comprehensible information about the logic used and the significance of such processing and the likely consequences for you.

The Data Controller will provide you with a copy of the personal data that is the subject of data processing. The Data Controller may charge a reasonable fee based on administrative costs for any additional copies requested by you. If you have submitted your application electronically, the information must be provided in a commonly used electronic format, unless you request otherwise. The right to request a copy must not adversely affect the rights and freedoms of others.

Your right to rectification or completion

Upon your request, the Data Controller is obliged to rectify any inaccurate personal data concerning you without undue delay. Taking into account the purpose of data processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary statement.

Your right to erasure

You have the right to request the Data Controller to delete the personal data concerning you. The Data Controller is obliged to delete the personal data concerning you without undue delay in the following cases:

- You withdraw your consent on which the processing is based and there is no other legal basis for the processing;
- you object to processing in the public interest, in the exercise of official authority or in the legitimate interests of the controller (third party) and there is no overriding legitimate reason for the processing, or you object to the processing for the purpose of direct marketing;
- Personal data was collected in connection with the provision of information society services.

The deletion request cannot be fulfilled if the data processing is necessary:

- for the purpose of complying with an obligation under Union or Member State law to which the Controller is subject to the processing of personal data, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- for the establishment, exercise or defence of legal claims.

Your right to block (restrict processing)

You have the right to request the Data Controller to restrict data processing if one of the following applies:

- you contest the accuracy of the personal data, in which case the restriction applies to the period that allows the Data Controller to verify the accuracy of the personal data;

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- the processing is unlawful and you oppose the erasure of the data and instead request the restriction of its use;
- the Data Controller no longer needs the personal data for the purposes of data processing, but you require them for the establishment, exercise or defence of legal claims, or
- the Data Subject objected to the data processing; in this case, the restriction shall apply for the period until it is established whether the legitimate reasons of the controller take precedence over the legitimate reasons of the Data Subject.

Where processing is restricted on the basis of the above, such personal data, with the exception of storage, may only be processed with your consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State. The Data Controller informs you in advance – at whose request the data processing has been restricted – about the lifting of the restriction of data processing. The blocking lasts as long as the reason you have indicated requires the storage of the data. You may request the blocking of data, for example, if you believe that your data have been unlawfully processed by the Data Controller, but it is necessary for the sake of the official or judicial proceedings initiated by the Data Controller that the Data Controller does not delete them.
In this case, the Data Controller will continue to store the personal data until the authority or the court is contacted, after which the data will be deleted.

Your right to object
You may object to the processing of your personal data if the legal basis for the processing is:
- Article 6 of the GDPR. (1) e) or the exercise of public authority vested in the controller;
- the legitimate interest of the Data Controller or a third party pursuant to Article 6(1)(f) of the GDPR.

In the case of exercising the right of objection, the Data Controller may no longer process the personal data, unless it proves that the data processing is justified by compelling legitimate reasons that take precedence over the interests and rights of the Data Subject or that are related to the submission, exercise or defence of legal claims.

If the processing of personal data is carried out for the purpose of direct marketing, the Data Subject has the right to object at any time to the processing of personal data concerning him or her for this purpose, including profiling, insofar as it is related to direct marketing. If the Data Subject objects to the processing of personal data for the purpose of direct marketing, the personal data may no longer be processed for this purpose.

Your right to data portability
You have the right to receive personal data concerning you which you have provided to a controller in a structured, commonly used and machine-readable format and to transmit such data to another controller without hindrance from the controller to whom you have provided the personal data, if:
- the legal basis for processing is your consent or the performance of a contract with you, and
- The processing is carried out by automated means.

When exercising the right to data portability, you have the right to request the direct transfer of personal data between controllers, if technically feasible.
The exercise of the right to data portability shall not infringe the right to erasure. The right to data portability does not apply if the 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. The right to data portability must not adversely affect the rights and freedoms of others.

Right to withdraw your consent

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You have the right to withdraw your consent to data processing at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before its withdrawal.

Your right to legal remedy
Contacting the Data Controller
We recommend that before initiating a court or official procedure, please send your inquiry or complaint related to the processing of your personal data to the Data Controller, so that we can investigate and remedy it satisfactorily, and we can fulfil any of your requests or requests under the previous point, if it is justified.

In the event of the enforcement of the Data Subject's right in relation to data processing as specified in the previous point, the request for information related to data processing, or the objection and complaint related to data processing, the Data Controller shall investigate the case without undue delay, within the time prescribed by the prevailing legislation, take measures in connection with the inquiry and provide information on the matter to the Data Subject. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended as provided for by law.

If the Data Subject submitted the request electronically, the Data Controller shall provide the information electronically if possible, unless the Data Subject requests otherwise. If the Data Controller does not take action on the basis of the Data Subject's request without delay, but no later than within the deadline specified by law, it shall inform the Data Subject of the reasons for the failure to take action, the refusal to comply with the request, and of the fact that the Data Subject may initiate court or official proceedings in his or her case as follows.

In order to enforce your rights related to data management, or if you have any questions or doubts about your data processed by the Data Controller, or if you request information about your data, wish to file a complaint or wish to exercise any of your rights under the previous point, the Data Controller may do so by I.) .

Initiating court proceedings
The Data Subject may turn to court against the Data Controller or, in connection with data processing operations falling within the scope of the data processor's activity, against the data processor if in its opinion the Data Controller or the data processor commissioned or acting on the basis of the Data Controller processes his or her personal data in violation of the provisions on the processing of personal data specified by law or in a binding legal act of the European Union.
The adjudication of the lawsuit falls within the jurisdiction of the General Court. The lawsuit may also be initiated before the competent court of the Data Subject's place of residence or residence, at the choice of the Data Subject.

Compensation and compensation for injury

- If the Data Controller causes damage or violates the data subject's privacy rights through its unlawful data processing or the violation of data security requirements, the data subject may claim damages and/or damages from the Data Controller.

- The Data Controller is exempt from liability for damages and the obligation to pay compensation for grievances if it can prove that the damage or the violation of the data subject's rights to the private sphere was caused by an unavoidable reason that falls outside the scope of data processing.

- The Data Controller is also exempt from liability for damages and the obligation to pay compensation for grievances if it can prove that the damage or the violation of privacy rights was caused by an unavoidable reason beyond the scope of data processing. No compensation or compensation for injury is payable if

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the damage or violation of rights was caused by the intentional or grossly negligent conduct of the person concerned.

Lodge a complaint with the supervisory authority

If you believe that your data are being processed unlawfully by the Data Controller – without prejudice to any other administrative or judicial remedies –, you have the right to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) (address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9., e-mail: **ugyfelszolgalatnaih.hu**, phone: +36 (1) 391-1400, fax: +36 (1) 391-1410, website: **www.naih.hu**) – in particular in the Member State of your habitual residence, place of work or place of the alleged infringement – if in the opinion of the Data Controller restricts the enforcement of its rights or rejects its request for the enforcement of these rights (initiation of an investigation), and if in the course of the processing of your personal data, the Data Controller or the data processor commissioned or acting on the basis of the Data Controller infringes the data protection rules on the processing of personal data, the requirements laid down in a law or a binding legal act of the European Union (request for an administrative procedure).

Privacy Policy **12 January 2026** effective from the date of the meeting.

The Three Corners Europe Hotel
Management Kft.
Mr. Didier Cormelius Lambrecht
Managing Director

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