

## DATA PROTECTION STATEMENT AND PRIVACY POLICY

Created by



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## 1. Introduction

Our Company, CDH Property Management Kft. (seat: 1023 Budapest, Vérhalom utca 12-16. 1. ép. [Hungary], trade register number: 01 09 681860, tax number: 11893657-2-41; hereinafter referred to as: 'The Controller', 'CDH', 'We' and other relevant grammatic forms) as the Controller, is fully aware of the importance of data protection for our Clients. It is our priority to be transparent about how we collect, use, transmit, transfer and store the personal data of our Clients.

The most important legal regulations regarding our data processing activities:

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter referred to as 'GDPR';
- Act CXII of 2011 on the Right to Informational Self-determination and on the Freedom of Information ('Privacy Act')
- Act CLVI of 2016 on State Functions Pertaining to the Development of Tourism Regions
- Act XLVIII of 2008 on Essential Conditions of and Certain Limitations to Business Advertising Activity

Please find below the most important elements of our Privacy Policy. Please keep on reading to learn the details of the method of data processing.

CDH may unilaterally modify this Privacy Policy at any time. This Privacy Policy and its prevailing modified version shall be published on the CDH website (<https://www.florinhotel.hu/home>).

It is important to regularly check to see if there are any updates to the Privacy Policy. The latest version of the Privacy Policy shall always be available on the website linked above. The date of coming into effect is always shown on the bottom of the page, and that makes it easy to see when the Privacy Policy had last been updated.

## 2. Definitions

**GDPR:** 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);

**personal data:** means any information relating to an identified or identifiable natural person ('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;

**special categories of personal data:** personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;

**processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction; preventing consultation and further use of data, taking photos, audio or visual recording, recording physical characteristics suitable for personal identification (e.g. fingerprint, palm print).

**Controller:** means the natural or legal person, or body without legal personality which, alone or jointly with others, determines the purposes and means of the processing of personal data; makes and executes or has the processor execute decisions pertaining to the data processing

**Processor:** means a natural or legal person, or body without legal personality which processes personal data on behalf of the controller;

**Data subject:** an identified or identifiable natural person who can be identified, directly or indirectly, based on one or more factors, by reference to an identifier; 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 by one or more factors;

**Transfers of personal data:** disclosing personal data to a specified third party. Transfers to EEA Member States or to bodies of the European Union shall be considered as transfers within the territory of Hungary.

**data erasure:** making the data unrecognisable by deletion of content or by any other means that enables an equivalent result.

**personal data breach:** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

**EEA Member State:** any Member State of the European Union and any State which is party to the Agreement on the European Economic Area, as well as any State the nationals of which enjoy the same legal status as nationals of States which are parties to the Agreement on the European Economic Area, based on an international treaty concluded between the European Union and its Member States and a State which is not party to the Agreement on the European Economic Area;

**third country:** any state that is not an EEA state;

**NAIH:** Hungarian National Authority for Data Protection and Freedom of Information.

### 3. What personal data do we process? What is the duration and purpose of processing your personal data? What authorisations do we have?

As such, we may rely on the following legal bases to process your personal information:

1. GDPR point a) of Article 6 (1) informed consent of the user to data processing (hereinafter referred to as: **Consent**);
2. GDPR point b) of Article 6 (1) processing is necessary for the performance of a contract to which the User as data subject is party (hereinafter referred to as: **Performance of a contract**);

3. GDPR point c) of Article 6 (1) processing is necessary for compliance with a legal obligation (e.g. accounting or bookkeeping obligations) to which the controller is subject (hereinafter referred to as: **Compliance with a legal obligation**);
4. GDPR point f) of Article 6 (1) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (hereinafter referred to as: **Legitimate interest**).

Please find below the legal basis for each data categories and purposes of processing, with reference to the abovementioned legal bases.

### 3.1. Communication

**Data subjects:** every natural person sending e-mail to any of our e-mail addresses shown on our website or calling us on phone.

**The purposes of the processing:** Communication.

Type of data	Legal basis	Retention period
name	GDPR point a) of Article 6 (1) Consent	Until consent is withdrawn
e-mail address		
phone number		

#### Processing:

If you provide us with your contacts via e-mail or phone, we shall use your contact information to communicate with you or to provide services.

Providing such data is optional, however, we will not be able to communicate with you unless you provide us with the data. You may withdraw your consent at any time without giving reasons, but such withdrawal shall not affect processing based on consent before the withdrawal.

### 3.2. Booking

**Data subjects:** natural persons booking accommodation at the Controller.

**The purposes of the processing:** Handling booking/reservations.

Type of data	Legal basis	Retention period
name	GDPR point a) of Article 6 (1) Consent	Until consent is withdrawn
e-mail address		
address		
phone number		
date of birth		
payment data		

preferences regarding the stay (e.g. dietary preferences, disabilities)		
name of additional guests (travelling together)		

**Processing:**

You have to provide the abovementioned data when booking through a booking service provider (Booking, HRS, Expedia, Hotelbeds, szállás.hu, Agoda).

Providing such data is optional, however, you will not be able to complete your booking unless you provide us with the data. You may withdraw your consent at any time without giving reasons, but such withdrawal shall not affect processing based on consent before the withdrawal.

By providing the name(s) of additional guest(s) (travelling with the person making the booking) the person booking the accommodation declares that s/he has acquired the other guest(s) consent prior to providing their name(s).

**3.3. Registration form**

**Data subjects:** Natural persons using the accommodation service.

**The purposes of the processing:** Entering into and performance of a contract regarding accommodation service.

Type of data	Legal basis	Retention period
name	GDPR point b) Article 6 (performance of a contract)	Maximum one year
address		
place and date of birth		
country		
passport number		
room number		
date of arrival/departue		
signature		

**Processing:**

All our guests shall fill in the registration form with the data listed above, upon arrival. Certain data from the registration form (name, room number, date of arrival and departure) shall be shown on the keycard holder.

Providing such data is necessary for entering into the contract.

**3.4. Recording data for submitting to the VIZA system**

**Data subjects:** Natural persons using the accommodation service.

**The purposes of the processing:** Compliance with obligation to provide data.

Type of data	Legal basis	Retention period
first name, family name	GDPR point c) of Article 6 (1) (Compliance with a legal obligation) Act CLVI of 2016 on State Functions Pertaining To The Development Of Tourism Regions	The accommodation provider shall process guest data until the last day of the first year after acquiring the data. VIZA system retains the data submitted for a maximum of two years.
first name, family name at birth		
place and date of birth		
sex		
nationality		
mother's first name and family name at birth		
data from documents suitable for personal identification or travelling documents		
address of accommodation service		
expected starting and end date of the use of accommodation, and actual day of departure		

**Processing:**

Upon arrival we ask you to present your ID card or passport, and we register the data using an ID scanner. The ID scanner transfers the data automatically to VIZA system. (For further information please visit <https://vizainfo.hu/>)

We process the abovementioned data in order to comply with our legal obligation to provide data. Providing such data is optional.

**3.5. Invoicing**

**Data subjects:** every natural person who uses our services.

**The purposes of the processing:** Managing accounting documents in compliance with the Act on Accounting.

Type of data	Legal basis	Retention period
name	GDPR point c) of Article 6 (1) (Compliance with a legal obligation)	Eight plus one years after the termination of the contractual relationship
address		

**Processing:**

When issued for private persons, the accounting documents may contain personal data. We retain such documents in accordance with paragraph 169 of Act C of 2000 on Accounting.

The relevant legal regulations state that it is compulsory to provide the personal data. The invoice is not valid otherwise. The data shall be stored electronically.

In the event of an audit, the data shall be disclosed to the competent authorities (the National Tax and Customs Administration).

**3.6. Newsletter**

**Data subjects:** Every natural person who subscribes for newsletter via our website.

**The purposes of the processing:** Sending newsletters.

Type of data	Legal basis	Retention period
name	GDPR point a) of Article 6 (1) Consent	Until consent is withdrawn
electronic mailing address		
date of signing up		

**Processing:**

Providing such data is optional; however, we will not be able to send you newsletter unless you provide us with the data. When you subscribe to our newsletter, you let us create and send personalised offers to you.

You may withdraw your consent at any time without giving reasons, but such withdrawal shall not affect processing based on consent before the withdrawal.

**3.7. Customer service, handling complaints**

**Data subjects:** Every natural person who contacts our customer service with requests, inquiries or complaints.

**The purposes of the processing:** Handling request and complaints.

Type of data	Legal basis	Retention period
name	GDPR point c) of Article 6 (1) (Compliance with a legal obligation), paragraph 17/A of Act CLV of 1997 on consumer protection	3 years
address		
electronic mailing address		



phone number		
previous handling of complaints, if any		
subject of request or complaint, place, date and method of complaint, description of the complaint		

**Processing:**

It is necessary to handle the abovementioned personal data when you contact our customer service with requests or complaints.

The relevant legal regulations state that it is compulsory to provide the personal data. We cannot handle your request or complaint otherwise.

Upon request from authorities, the data shall be disclosed to the competent authorities.

**3.8. Camera surveillance**

**Data subjects:** persons entering the cameras' field of view.

**The purposes of the processing:** Protection of property

Type of data	Legal basis	Retention period
image	GDPR point f) of Article 6 (1) (legitimate interest)	Three weeks

**Processing:**

The images of persons entering the Controller's premises are registered in the electronic surveillance system used.

The surveillance system is operated by the Controller.

If requested, data may be transferred to the competent law enforcement bodies.

The provisions regarding video surveillance are contained in a separate surveillance policy.

We have performed a balancing test regarding necessity and proportionality of data processing and the results show that processing is lawful.

The data subject shall have the right to object to the processing of personal data (for details please see section 6.8).

**3.9. Entering into contracts (suppliers, subcontractors, other service provider)**

**Data subjects:** Representative of the natural/legal person entering into contract with the Controller.

**The purposes of the processing:** Performance of a contract.

Type of data	Legal basis	Retention period
name	GDPR point b) Article 6 (performance of a contract)	Five years after the termination of the contractual relationship.
e-mail address		
address, mailing address		
name of contact person	GDPR point f) of Article 6 (1) (legitimate interest pursued by the Controller)	
phone number of contact person		
e-mail address of contact person		

### Processing:

We use our partners' personal data to communicate with them in order to perform the contract.

When we receive the personal data of the partner's employees, usually to enable communication, we process such data on the basis of legitimate interest. Pursuing the legitimate interest of the parties shall override the employee's right to have control of his or her personal data, as the restriction is necessary and proportionate for the employee to perform his or her job (NAIH/2018/2570/2/V). We have performed a balancing test regarding legitimate interest and the results show that processing is lawful.

The data subject shall have the right to object to the processing of personal data (for details please see section 6.8.

Providing the data is optional in such cases; however, it is necessary to acquire personal data suitable for identification and communication in order to enter into contract or agreement.

You may withdraw your consent at any time without giving reasons, but such withdrawal shall not affect processing based on consent before the withdrawal or further processing related to pursuing our legitimate interests..

The data may be disclosed to our law office partner. In the event of an audit, the data shall be disclosed to the competent authorities (the National Tax and Customs Administration).

### 3.10. Social media

When the user decides to like or follow the Controller's social media site, we may also acquire the following data of the user: profile name, profile's URL, profile identifier, profile picture, address stated, gender, birthday, introduction. In relation to the personal data provided by the visitors on social media sites, it is the operator of the Social Media site who is considered the Controller, and the operator's terms on data protection and services shall apply.

### 3.11. Cookies

When the User visits our website [www.florinhotel.hu](http://www.florinhotel.hu), and use our services, we place cookies (small data files) in the User's web browser and in HTML-based e-mails, in accordance with this Privacy Policy.

Cookies are small data files that are placed on your computer when you visit a website. They are saved and stored by your web browser. Cookies enable us to see the time the User last logged in to our website. The main purpose of cookies is to make personalised offers and advertisements available for the User, to personalise the User experience and meet the User's personal needs when using our website.

Cookies are used for a number of useful purposes.

- Safety: to support and ensure safety, and help CDH to detect illegal activities.
- Preferences, characteristics and services: cookies can show CDH the User's language and communication preferences, and help the User to fill out forms on the website by simplifying the process.
- Advertisements: CDH may use cookies to show advertisements relevant to the User, on and outside the website. We may use cookies that show whether Users who have seen a certain advertisement on the website visited the advertiser's website later. Likewise, CDH's business partners may use cookies to determine whether CDH has displayed their advertisement on the website and how successful that advertisement was. They may inform CDH on the User's behaviour regarding the advertisements. CDH may also work with partners who display advertisements for the User on or outside the website after the User has visited the partner's website.
- Performance, analytics and research: these cookies help CDH to learn about the website's performance in different places. CDH may use cookies that assess, improve and search the website, the product, functions, services, including the User's visiting the website via other websites, or devices such as the User's computer or mobile device.

### Cookie types we use

#### Essential website cookies:

- cookies storing data given by the User ('user input cookies'): session cookies based on a session identifier (a randomised temporary identification number) that expire at the end of session the latest, upon exiting the browser. These enable the User to enter data, so these cookies are linked to the User's activity during communication (e.g. filling out forms, or clicking on a button) with the service provider.
- multimedia player session cookies: it is used to store technical data (image quality, network speed and buffering parameters) necessary to play video or audio contents. These cookies also expire upon exiting the browser.
- social content sharing cookies: enable the users of social networks to share with their friends contents they like. These cookies are deleted upon the user logging out the social media platform or closing the browser.

#### Functionality cookies:

Such cookies are not essential to provide the services the User requires. For this reason they have to be accepted specifically if the User wishes to use them.

- Social content sharing tracking cookies: when the members of social media platforms have accepted 'tracking' in a certain social media platform settings, e.g. to allow displaying behaviour-based advertisement.
- Own visitor analytics: visitor analytics are statistical tools measuring the popularity of a website, by using cookies. Such tools estimate the number of individual visitors, detect the most often used keywords on search engines that led to a certain website, and track certain web navigation questions. They are exclusively used for goals relating to own total statistics, and faster, more precise catering to visitor demands.

#### Performance cookies:

These cookies provide us with information by monitoring User demands, and enable us to improve our website. These cookies collect information that shows, for example, which menu the user selected or where the User clicked on the website, how long each session was, and which documents were downloaded by the user. We also use third party cookies for this purpose.

#### Remarketing cookies:

These are used for targeted advertisements for the website visitors.

These cookies do not link the data to the person. It is the advertisers who display advertisements depending on your browsing habits.

#### **Checking and controlling cookies:**

Upon your first visit to our website, we offer you detailed information and configuration options for the cookies we use, in a pop-up window.

Most browsers have the option for the Users to control cookie settings. However, restricting the use of website cookies may lead to poor user experience, as the website would not be personalised any more. The User may also reject saving personalised information, such as log-in data.

If the User does not want CDH to use cookies, the User may choose the settings they prefer in the pop-up window upon the first visit to our website.

The User may reject certain cookies later in the browser's settings. To learn about the User rejecting certain cookies, CDH places cookies on the User's device. This way CDH will know that it is not allowed to place cookies next time the User visits the website.

## **4. Who processes your personal data? Who can access your personal data?**

### **4.1. The Controller**

The Controller of your personal data defined in Section 2 is **CDH Property Management Korlátolt Felelősségű Társaság.**

**CDH Property Management Kft.**

Trade register number: 01 09 681860

Tax number: 11893657-2-41

Seat: 1023 Budapest, Vérhalom utca 12-16. 1. ép.

Representative(s): Managing directors Szöllősi, Péter and Dul, Zita

E-mail: reception@florinhotel.hu

CDH employees may access your data, to the extent it is strictly necessary to perform their job. We have strict inner regulations regarding the rights of access.

#### 4.2. Data processors

We work with other companies when processing and storing your data. In compliance with the legal regulations, we always have written agreements with the processors involved in our data processing activities. We work with the following data processors:

Data processors	Contact info	Service
Netteszt Kft	2013 Pomáz, Katona József utca 17/d., <a href="https://netteszt.hu/kapcsolat">https://netteszt.hu/kapcsolat</a> <a href="mailto:info@netteszt.hu">info@netteszt.hu</a>	hosting provider, e-mail server
thePass Kft	1061 Budapest, Király utca 32, <a href="https://www.sabeeapp.com/hu/security-compliance">https://www.sabeeapp.com/hu/security-compliance</a> ,	PMS system (Sabeeapp)
Magyar Turisztikai Ügynökség [Hungarian Tourism Agency]	<a href="https://vizainfo.hu/">https://vizainfo.hu/</a>	VIZA, NTAK
booking providers, e.g.: Booking.com, HRS.com, Expedia.com, Hotelbeds.com, szállás.hu, Agoda.com etc.		

## Information on cross-border data transfers:

We do not transfer data to a third country. Should we transfer data to a third country, we shall only transfer data to providers that ensure adequate level of the protection of personal data, in accordance with Article 45-47 of the GDPR. We shall check that in each case individually.

## 5. Who do we transfer your data to?

In addition to the abovementioned data processors, we may transfer your personal data to recipients within our group of companies, in order to ensure they can provide us with certain services (e.g. accounting).

## 6. The rights of data subjects

### 6.1. Right to information

The data subject shall have the right to receive information prior to processing of personal data in a transparent, intelligible, clear and easily accessible form in writing from the Controller. The Controller shall provide the information when personal data are obtained the latest.

Where the Controller intends to process the personal data for a purpose other than that for which they were collected, the Controller should provide the data subject prior to that further processing with information on that other purpose and other necessary information.

### 6.2. Right of access

The data subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the Controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;

- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The Controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

### **6.3. Right to rectification**

The data subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

### **6.4. Right to erasure ('right to be forgotten')**

The data subject shall have the right to obtain from the Controller the erasure of personal data concerning him or her without undue delay and the Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which processing is based, and where there is no other legal ground for the processing;
- c) the data subject objects to the processing, and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

Where the Controller has made the personal data public and is obliged pursuant to the points above to erase the personal data, the 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.

The points stated above shall not apply to the extent that processing is necessary:

- a) for exercising the right of freedom of expression and information;

- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- c) for reasons of public interest in the area of public health;
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims .

#### **6.5. Right to restriction of processing**

The data subject shall have the right to obtain from the Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and you oppose the erasure of personal data and request the restriction of their use instead;
- c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the Controller override those of the data subject.

When processing has been restricted in accordance with the points above, such personal data shall, with the exception of storage, only be processed with the data subject's 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.

A data subject who has obtained restriction of processing shall be informed by the Controller before the restriction of processing is lifted.

#### **6.6. Right to notification regarding rectification or erasure of personal data or restriction of processing**

The data subject has the right to request from the Controller information about the recipients to whom the personal data have been disclosed. The Controller shall be obliged to communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

#### **6.7. Right to data portability**

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where:



- a) the processing is based on consent or on a contract; and
- b) the processing is carried out by automated means.

In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Exercising the data subject's right to data portability shall not adversely affect the rights and freedoms of others. Should that be the case, the Controller shall comply with the right of the data subject to data portability without disclosing the personal data supported by that fact, while informing the subject in details.

### **6.8. Right to object**

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 which is based on the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller, or for the purposes of the legitimate interest pursued by the Controller or by a third party, including profiling based on those provisions. The Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

### **6.9. Automated decision-making, profiling**

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. This shall not apply if the decision:

- a) is necessary for entering into, or performance of, a contract between the data subject and a data controller;
- b) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- c) is based on the data subject's explicit consent.

In the cases referred to in points a) and c), the data Controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the Controller, to express his or her point of view and to contest the decision.

#### **6.10. Right to communication of a personal data breach to the data subject**

When a personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Controller shall communicate the personal data breach to the data subject.

#### **6.11. The data subject's right to lodge a complaint with a supervisory authority**

Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes the Regulation.

The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy.

Supervisory authority of Hungary as Member State:

Nemzeti Adatvédelmi és Információszabadság Hatóság [Hungarian National Authority for Data Protection and Freedom of Information] (postal address: 1363 Budapest, Pf. 9., seat: 1055 Budapest, Falk Miksa utca 9-11., website: [www.naih.hu](http://www.naih.hu), phone number: 06-1-391-1400, e-mail address: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

#### **6.12. Right to an effective judicial remedy against a supervisory authority**

Without prejudice to any other administrative or non-judicial remedy, each natural or legal person shall have the right to an effective judicial remedy against a legally binding decision of a supervisory authority concerning them.

Without prejudice to any other administrative or non-judicial remedy, each data subject shall have the right to an effective judicial remedy where the competent supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged.

Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

The data subjects involved may exercise these rights in writing, using our contact information provided in chapter 4, or, upon prior consultation, in person. We are doing our best to reply to each request as soon as possible, but within 15 workdays the latest.