

Data Protection Regulation

I. Purpose of the Regulation

It is in this regulation that the Universitas Servic Közhasznú Nonprofit Kft. (translated as Universitas Service Public Utility Nonprofit Ltd.) (seat: 2400 Dunaújváros, Táncsics M. u. 1/a., trade register No.: 07-09-016694) specifies the provisions of data protection and data management connected with the hotel services provided by them. The regulation is aimed at specifying the scope of personal data managed during the provision of hotel services, the purposes and method of data management, its time and other provisions relating to the data management in conformity with the legal rules.

Place of hotel services: Hotel Kerpely, 2400 Dunaújváros, Dózsa György út 35.
Web page to access the hotel services: www.hotelkerpely.hu

II. Legal background of the Regulation

The legal background of this data protection regulation is ensured by the legal rules listed below, the relevant provisions of which shall also be applied in the issues not regulated in this regulation:

- Act CVIII of 2001 on certain issues of electronic commercial services and services connected with the information society;
- Act CXII of 2011 on the right of information self-determination and the freedom of information;
- Act CXXXIII of 2005 on the rules of activity of personal- and property protection and private investigators.

III. Terms used in the Regulation

- The Universitas Service Közhasznú Nonprofit Kft., as the legal entity providing hotel services, hereinafter: the **Service Provider**;
- Hotel service provided by the **Service Provider**, hereinafter: **Services**;
- User of the **Services**, hereinafter: **Guest**.

When interpreting other terms and terminology used in this regulation, the explanatory rules specified in the legal rules listed in clause II shall apply.

IV. Effect of the Regulation

The effect of this Regulation covers the data management activity performed at the time of both personal and online reservations during the Services provided by the Service Provider.

The personal effect of this Regulation covers both the persons using the Services as well as the employees, agents and contractors of the Service Provider.

This Regulation takes effect on August 23rd, 2016 and remains valid until it is repealed.

V. Scope of data managed by the Service Provider

A. Within the hotel services provided, the Service Provider manages the personal data of Guests as follows based on personal publication of Guests:

- name, residential address, nationality, date of birth.

With the view of verifying the truth of residential address stated by the Guest, the Service Provider is entitled to verify the address card and the personal ID card, photocopying them if required to certify the exemption from the tourist tax.

The Service Provider is allowed to make photocopy of the personal documents exclusively subject to the explicit consent given by the Guest. In such cases, the photocopy shall include the approving declaration and signature of the person using the services.

B. Other data managed by the Service Provider:

- date of using the Services,
- duration of using the Services,
- place of using the Services.

With the view of providing the Services, the Service Provider is entitled to manage the personal data in addition to the clauses A and B that are technically indispensable for providing the Services.

VI. Legal background of data management by the Service Provider

The personal data according to clause V are allowed to be managed — at the time of personal appointment — subject to the consent of the Guest. The contract concluded in the subject of Services i.e. the hotel reservation includes that the signature of Guest means the agreement to manage his/her data according to those specified in this Regulation.

Should the Services requested on the web page, the legal background of managing the data listed in clause V. shall be the consent of the Guest as well as the Act CVIII of 2001 on certain issues of electronic commercial services and services connected with the information society, section 13/A clauses (1) to (3).

VII. Purpose of data management performed by the Service Provider

The Service Provider manages the data listed in clause V.A. of persons using the Services exclusively with the view of the objectives as follows in order to exercise the right and fulfil the obligations listed below:

- in the matter of providing quarters, setting up contracts, specifying the content of contracts, their modification, monitoring their,
- putting fees originating from contracts into invoice,
- enforcement of claims relating to contracts.

The Service Provider is allowed to manage the data listed in clause V.B. exclusively for the purpose of invoicing the fees originating from contracts aimed at providing Services.

Being other conditions identical, the Service Provider shall choose and in any case operate the means used during the Services in a way that personal data management shall take its turn only if it is absolutely necessary for providing Services and fulfilling other objectives specified in the relevant legal rules; however, to the necessary extent and for the time even in such cases.

VIII. Way of data management

The Service Provider records the data listed in this Regulation on computer-based data carrier and stores them in conformity with this Regulation and the provisions of the relevant legal rules, with the limits set by the legal rules taken into consideration.

IX. Duration of data management

The Service Provider preserves the data listed in this Regulation for 6 years following the time of their drawing up. Should the enforcement of claims relating to the contract for provision of quarters take its turn by means of either legal action or extra judicial procedure, the Service Provider is entitled to manage the data listed in clause V. up to the valid closing of these procedures. On expiry of the term of data management, the Service Provider shall delete the data managed.

Person entitled to data management on the part of the Service Provider

The employers entitled on the part of the Service Provider to manage the data listed in this Regulation are: hotel manager, person responsible for reception, warden, business executive.

X. Persons entitled to get acquainted with the data managed by the Service Provider

The employees, agents and contractors of the Service Provider cooperating in the fulfilment of objectives specified in clause VII are entitled to get acquainted with the data managed in conformity with this Regulation, exclusively with the view of fulfilling these objectives. Further persons entitled to get acquainted with the data are the authorities, courts etc. specified in the relevant legal rules.

XI. Rights and legal remedy possibilities of Guest in connection with the data management

The rights and legal remedy possibilities of the Guest are included in the Act CXII of 2011 on the right of information self-determination and the freedom of information, sections 14 to 19.

XII. Information of the Service Provider on the camera system operated at the Hotel Kerpely

An electronic monitoring and recording (CCTV) system is operated at the reception desk of Hotel Kerpely. In case of any suspected crime, minor offence or accident, the records are allowed to be examined by the competent investigation authority, prosecution office, court and expert in conformity with the provisions of the relevant legal rules.

Both the pictures recorded by the CCTV system and the personal data are managed by the Service Provider.

With the view of protecting the human life, corporal integrity and the property, the data management is aimed at preventing violations of law, their detection, catching the committer in the act as well as proving the crimes, identification of persons entering the area of Hotel Kerpely without permission, recording the fact of entry, documentation of the activity of those staying there without authorization, examination of the circumstances of possible accidents that occur at places of work or elsewhere.

Legal backgrounds of the data management are as follows: consent of the person concerned by entering the area of Hotel Kerpely, furthermore the Act CXXXIII of 2005 (SzVMT with Hungarian initials) on the rules of activity of personal- and property protection and private investigators, section 30. Persons entering the reception desk of the hotel are informed on the location of cameras by means of notice-boards.

Scope of the data managed: portrait of the persons: portrait of persons entering the area of Hotel Kerpely visible on the records together with other personal data. Data are preserved for thirty net days if not used.

Multialarm Kft. participates in the operation and data processing of the CCTV system and performs its maintenance as required.

The person photographed is entitled to ask for information relating to the data management, to request for deleting and closing the pictures made of him/her and, in addition, to protest against the management of his/her data.

The person concerned is entitled to bring his/her comments before the Hotel Kerpely, and in conformity with the Act CXII of 2011, to enforce his/her rights before the court and to make notification to the National Data Protection and Information Freedom Authority

This Data Protection Regulation will be displayed at the seat of HOTEL Kerpely at a well visible place and is also accessible on the web page of the hotel to get acquainted with. By means of publishing this regulation, the Service Provider fulfils its information obligation specified in the Act CXII of 2011, section 20.

.....
Gábor Füredi
managing director