

Hunguest Zrt. – WEBSITE PRIVACY NOTICE

1. Identification of the Data Controller

The website <https://taluetterem.hu> (hereinafter referred to as the “Website”) is operated by Hunguest Accommodation Services Private Company Limited by Shares.

Short name: Hunguest Plc.

Company registration number: 01-10-142591 – Company Registry Court of the Budapest-Capital Regional Court

Tax number: 32431081-2-44

Registered office: 38 Váci Street, Budapest 1056, Hungary

Postal address: P.O. Box 813, Budapest 1535, Hungary

Represented by: Dr. Ádám Détári-Szabó, Chairman of the Board of Directors

Website: <https://www.taluetterem.hu>

E-mail: info@hunguesthotels.hu

(hereinafter referred to as the “Data Controller”)

Contact Details of the Data Protection Officer

Name: Kertész and Partners Law Firm

E-mail: adatvedelem@hunguesthotels.hu

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2. Applicable Data Protection Legislation and Scope of this Notice

2.1.

The Data Controller's activities relating to the processing of personal data are primarily governed by the following legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation – GDPR) concerning the protection of natural persons with regard to the processing of personal data and on the free movement of such data;
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Info Act);
- Act CLV of 1997 on Consumer Protection;
- Act CXXVII of 2007 on Value Added Tax;
- Act C of 2000 on Accounting.

2.2.

This Privacy Notice applies to all personal data processing activities carried out through or in connection with the services provided by the Data Controller via the Website.

Information regarding data processing activities related to individual catering establishments operated by the Data Controller is available in separate privacy notices applicable to the respective establishment.

The personal scope of this Notice covers visitors of the Website and natural persons who contact the Data Controller (hereinafter referred to as the "Data Subject").

3. Definitions

3.1.

The terminology used in this Privacy Notice corresponds to the definitions set forth in applicable legislation, particularly Article 4 of the GDPR and Section 3 of the Hungarian Info Act.

3.2.

Whenever this Notice refers to "data" or "data processing", it shall mean personal data and the processing thereof.

4. Cookie Management

The Data Controller uses cookies to operate the Website and to collect technical information regarding visitors.

Detailed information on the use of cookies is available at:

https://www.hunguesthotels.hu/hu/tajekoztato_sutik_alkalmazasrol/

5. Data Processing Related to Enquiries and Requests for Quotations

5.1. Description of the Processing

Data Subjects may contact the Data Controller via the contact details provided on the Website or by sending messages through Messenger on the Data Controller's Facebook page (<https://www.facebook.com/talu/>) for enquiries, quotation requests, or other purposes.

Based on the information provided, the Data Controller can identify the person making the enquiry and respond accordingly.

5.2. Purpose of the Processing

The purpose of the processing is to respond to enquiries submitted by the Data Subject, including providing information about services and sending quotations.

5.3. Categories of Personal Data Processed

- Name
- E-mail address, telephone number, postal address (depending on the communication channel)
- In the case of quotation requests: number of guests (adults and children), type of requested offer, planned arrival date
- Any additional information voluntarily provided by the Data Subject

Messenger services are provided by Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland; "Meta Ireland"), which acts as an independent data controller.

5.4. Categories of Data Subjects

Individuals who contact the Data Controller, express interest in its services, or request quotations regarding catering establishments operated by the Data Controller.

5.5. Legal Basis for Processing

Where processing is necessary to respond to a request submitted by a Data Subject prior to entering into a contract, the legal basis is the legitimate interest of the Data Controller pursuant to Article 6(1)(f) GDPR.

The Data Controller has a legitimate interest in providing information about its services, answering enquiries, and sending personalised quotations upon request.

5.6. Retention Period

If no contract or other agreement is concluded as a result of the communication, the Data Controller deletes the message(s) after the communication has been definitively closed.

If a contract is concluded between the parties, the personal data will be processed together with the contractual data.

5.7. Source of Personal Data

The personal data are provided directly by the Data Subject.

5.8. Recipients of the Personal Data

The data processors engaged by the Data Controller are listed in Section 10 of this Notice.

5.9. Information on Joint Controllership

In connection with the use of Facebook and Messenger services, Meta Platforms Ireland Limited (“Meta Ireland”) and the Data Controller may qualify as joint controllers.

Joint controllership is governed by Article 26 GDPR. Where two or more controllers jointly determine the purposes and means of processing, they are considered joint controllers.

Meta Ireland’s Data Protection Officer may be contacted at:

<https://www.facebook.com/help/contact/540977946302970>

The joint controllers transparently define their respective responsibilities regarding compliance with GDPR obligations, particularly in relation to the exercise of data subject rights and information obligations.

The Joint Controller Addendum is available at:

https://hu-hu.facebook.com/legal/terms/page_controller_addendum

Data Subjects may exercise their rights under the GDPR against either controller.

Each joint controller is required to comply with applicable data protection legislation.

5.10. Consequences of Failure to Provide Personal Data

Providing personal data is voluntary; however, without the necessary information, the Data Controller may not be able to respond adequately to enquiries or provide quotations.

Küldheted a következő részt (6–10. pont), és folytatom ugyanilyen formában.

6. Table Reservations

6.1.

The Data Controller enables Data Subjects to make table reservations through the Website, by telephone, or by e-mail.

Telephone calls made for reservation purposes are not recorded.

6.2. Purpose of Processing

The purpose of the processing is to manage table reservations, link guests to their reserved tables, and facilitate communication with guests.

6.3. Categories of Personal Data Processed

In connection with reservations, the Data Controller processes the following personal data:

- Name of the Data Subject;
- Telephone number and e-mail address of the Data Subject;
- Billing information (e.g., residential address);
- Date and time of arrival;
- Number of guests using the service (adults and children), including the age of children;
- Information relating to the selected table, offer, or payment method;
- Any additional information, comments, or requests provided by the Data Subject.

Special requests provided by the Data Subject may qualify as special categories of personal data if they relate to health conditions (e.g., food allergies or intolerances) or religious beliefs.

The reservation service is provided by SevenRooms Inc. (228 Park Ave South, New York, NY 10003, USA), which acts as an independent data controller.

6.4. Categories of Data Subjects

Individuals making table reservations at catering establishments operated by the Data Controller.

6.5. Legal Basis for Processing

As the processing is necessary to make a reservation at the request of the Data Subject and to provide the related services, the legal basis for processing is Article 6(1)(b) GDPR.

Where the Data Subject provides special categories of personal data (e.g., food allergies, health-related information, religious or other special dietary requirements), such data are processed based on the Data Subject's explicit consent pursuant to Article 9(2)(a) GDPR.

6.6. Retention Period

If the reservation is cancelled or no agreement is concluded, the personal data shall be deleted without undue delay.

Where a reservation results in a contract and the service is provided, the Data Controller shall process the personal data for the applicable statutory limitation period.

6.7. Source of Personal Data

The personal data are provided directly by the Data Subject.

6.8. Recipients of Personal Data

The data processors engaged by the Data Controller are listed in Section 10 of this Notice.

6.9. Consequences of Failure to Provide Personal Data

Without the personal data required to process the reservation, the Data Controller is unable to record or fulfil the reservation; consequently, the service cannot be provided.

7. Table Reservations Based on Cooperation Agreements

7.1. Description of Processing

Based on cooperation agreements and framework agreements, the Data Controller allows its partners to provide designated guests with services under preferential or individually negotiated conditions.

The partner is required to provide the names of the guests and the basic reservation details.

7.2. Purpose of Processing

The purpose of processing is to identify guests referred by partners and provide the agreed services to them.

7.3. Categories of Personal Data Processed

- Guest name;
- Reservation-related information.

7.4. Categories of Data Subjects

Guests of the Data Controller's business partners.

7.5. Legal Basis for Processing

The legal basis for processing is the legitimate interest of the Data Controller pursuant to Article 6(1)(f) GDPR.

7.6. Retention Period

Personal data are processed until the guest's arrival. In the event of cancellation, the data shall be deleted.

7.7. Source of Personal Data

The business partner.

7.8. Recipients

The data processors are listed in Section 10.

7.9. Consequences of Failure to Provide Personal Data

Without the necessary personal data, the guest cannot be identified and the service cannot be provided.

8. Data Processing Related to Issuing and Retaining Invoices

8.1.

The Data Controller issues invoices for services provided through the Website.

8.2. Purpose of Processing

The purpose of processing is the issuance and retention of invoices in compliance with legal obligations.

8.3. Categories of Personal Data Processed

- Name;
- Billing address;
- Tax identification number (in the case of sole proprietors).

8.4. Categories of Data Subjects

Natural persons using the services.

8.5. Legal Basis for Processing

The legal basis for processing related to invoicing is Article 6(1)(c) GDPR, namely compliance with a legal obligation pursuant to Section 169 of Act C of 2000 on Accounting and Section 159(1) of Act CXXVII of 2007 on Value Added Tax.

8.6. Retention Period

Invoices are retained by the Data Controller for at least eight (8) years in accordance with Section 169 of the Accounting Act.

8.7. Source of Personal Data

The personal data are provided directly by the Data Subject.

8.8. Recipients of Personal Data

The data processors engaged by the Data Controller are listed in Section 10 of this Notice.

8.9. Consequences of Failure to Provide Personal Data

Providing personal data is a legal requirement; therefore, the Data Subject is obliged to provide the necessary personal data.

9. Complaint Handling

9.1. Description of Processing

In accordance with consumer protection legislation, the Data Controller enables consumers using its services to submit complaints.

Complaints are handled pursuant to the provisions of Act CLV of 1997 on Consumer Protection.

In the case of an oral complaint, if the consumer disagrees with the immediate handling of the complaint or if immediate investigation is not possible, the Data Controller shall record the complaint and its position in a written report in accordance with Section 17/A (3) of the Consumer Protection Act.

9.2. Purpose of Processing

The purpose of processing is to investigate and handle consumer complaints and to comply with applicable legal obligations.

9.3. Categories of Personal Data Processed

The complaint record may contain the following data pursuant to Section 17/A (5) of the Consumer Protection Act:

- Name and address of the Data Subject;
- Place, date, and method of submitting the complaint;
- Detailed description of the complaint and a list of supporting documents and evidence;
- The Data Controller's position regarding the complaint (where immediately available);

- Details of the person recording the complaint and, in the case of oral complaints (except complaints submitted by telephone or electronically), the consumer's signature;
- Place and date of recording the complaint;
- Unique complaint identification number in the case of complaints submitted by telephone or electronically.

The Data Controller may also process the Data Subject's contact details, including telephone number and e-mail address.

9.4. Categories of Data Subjects

Natural persons submitting complaints to the Data Controller.

9.5. Legal Basis for Processing

The legal basis for processing is Article 6(1)(c) GDPR, namely compliance with a legal obligation arising from Section 17/A of the Consumer Protection Act.

9.6. Retention Period

The Data Controller is required to retain the complaint record and a copy of its response for three (3) years.

9.7. Source of Personal Data

The personal data are provided directly by the Data Subject.

9.8. Recipients of Personal Data

The data processors engaged by the Data Controller are listed in Section 10 of this Notice.

9.9. Consequences of Failure to Provide Personal Data

Providing personal data is required by law. Failure to do so may prevent the Data Subject from exercising their consumer protection rights.

10. Identification of Data Processors

10.1.

A data processor may process the Data Subject's personal data solely for the purposes determined by the Data Controller and documented in a contractual agreement, and only in accordance with the Data Controller's instructions.

The data processor has no independent decision-making authority regarding the processing of personal data.

The data processor is bound by confidentiality obligations and must provide appropriate safeguards for the protection of personal data.

10.2. Data Processors Engaged by the Data Controller

1. Website Maintenance and Development

KMAK Kelet-Magyarországi Adatközpont Szolgáltató Kft.

Registered office: 20 Szapáry Street, Building A, 3rd Floor, Door 6, 5000 Szolnok, Hungary

E-mail: info@kmak.hu

Website: <https://www.kmak.hu>

2. IT Infrastructure and Hosting Services

mBIT Technológiai Szolgáltató Zrt.

Registered office: 3 Borház Road, 3000 Hatvan, Hungary

Telephone: +36 30 977 4535

Website: <https://mbitech.hu>

3. Table Reservation System

SevenRooms Inc.

Registered office: 228 Park Ave South, New York, NY 10003, USA

Telephone: +1 (877) 777-0907

Website: <https://www.sevenrooms.com>

Íme a **11–14. pont angol fordítása:**

11. Data Protection and Data Security

11.1.

The Data Controller shall ensure the security of personal data and implement appropriate technical and organisational measures to prevent unauthorised access, loss, alteration, transmission, disclosure, or destruction of personal data.

11.2.

Personal data shall be processed solely for the purposes specified in this Privacy Notice and in accordance with the principles of necessity and proportionality.

11.3.

The Data Controller shall ensure through its agreements with data processors that appropriate data security measures are implemented and maintained.

12. Rights of Data Subjects

12.1. Right to Information

The Data Subject has the right to receive information regarding the details of the processing of their personal data.

12.2. Right of Access

The Data Subject has the right to obtain confirmation as to whether or not personal data concerning them are being processed and, where that is the case, to request access to and a copy of such personal data.

12.3. Right to Rectification

The Data Subject has the right to request the correction of inaccurate personal data and the completion of incomplete personal data.

12.4. Right to Erasure

The Data Subject has the right to request the deletion of their personal data where the legal conditions for erasure are met.

12.5. Right to Restriction of Processing

Under certain circumstances, the Data Subject may request the restriction of the processing of their personal data.

12.6. Notification Obligation

The Data Controller shall inform recipients of any rectification, erasure, or restriction of processing, where required by applicable law.

12.7. Right to Data Portability

The Data Subject has the right to receive their personal data in a structured, commonly used, and machine-readable format.

12.8. Right to Object

The Data Subject has the right to object to the processing of their personal data where such processing is based on the legitimate interests of the Data Controller.

13. Handling of Data Subject Requests

13.1.

The Data Controller shall process requests free of charge unless the requests are manifestly unfounded or excessive.

13.2.

The standard response period is one (1) month from receipt of the request. Where justified by the complexity or number of requests, this period may be extended by a further two (2) months.

13.3.

Data Subjects may submit their requests by post or by e-mail using the following contact details:

Postal address:

P.O. Box 813, Budapest 1535, Hungary

E-mail:

adatvedelem@hunguesthotels.hu

14. Enforcement of Rights

14.1.

Data Subjects may submit complaints directly to the Data Controller:

Hunguest Plc.

E-mail: adatvedelem@hunguesthotels.hu

Address: 38 Váci Street, Budapest 1056, Hungary

14.2.

Data Subjects may also seek legal remedy by contacting the Hungarian National Authority for Data Protection and Freedom of Information (NAIH):

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

Address: 9–11 Falk Miksa Street, Budapest 1055, Hungary

Postal address: P.O. Box 9, Budapest 1363, Hungary

E-mail: ugyfelszolgalat@naih.hu

Website: <http://naih.hu>

14.3.

Data Subjects are also entitled to initiate legal proceedings before the competent court. Proceedings may be brought before the court having jurisdiction over the Data Subject's place of residence or habitual residence.

Hunguest Zrt.

