

MAISON 45

GDPR  
PRIVACY POLICY

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Maison 45 Kft. Public Data processing notice

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## Maison 45 Kft. Public Data processing notice

Please read this notice carefully to understand how we process your personal data. If you have any questions, feel free to contact us using any of the provided contact details. Do not hesitate to reach out to us with confidence!

Maison 45 Kft., as the Data Controller, values and respects the privacy of all individuals whose personal data is entrusted to us. We are fully committed to safeguarding the personal data we process and ensuring that it is treated with the highest standards of security, in compliance with applicable data protection laws.

This notice applies to all individuals, including but not limited to our clients, employees working for our clients, website visitors, hotel guests, partners, suppliers (including potential suppliers), and their respective employees.

Maison 45 Kft. works with external partners to perform certain tasks as part of its operations. These partners are bound by contractual agreements that outline the rules for data processing. Depending on the nature of the task, Maison 45 Kft. may have either a joint data controller or a data processor relationship with these partners. The principles outlined in this Data Processing Notice apply to all such partners.

## I. Data controller information

Name:	Maison 45 Korlátolt Felelősségű Társaság
Registered office:	1061 Budapest Andrásy út 33.
Company registration number:	01-09-187047
Tax identification number:	24873910-2-42

## II. Principles of data processing

### II./1 Lawfulness, fairness and transparency

The processing of personal data must be lawful, fair, and transparent. What does this look like in practice? Let's break it down.

Lawfulness and Fairness mean that personal data must always be collected using legal and fair methods, and these principles must be upheld throughout the entire data processing period. Additionally, every instance of data processing must have a valid legal basis. The GDPR defines six specific legal bases for processing personal data:

1. Consent
2. The performance of a contract
3. Compliance with a legal obligation
4. Vital interests
5. Public interest
6. Legitimate interest of the Data Controller.

For more information, please refer to the section Legal Bases of Data Processing.

Transparency means that data processing must be conducted in a way that keeps you fully informed about all relevant aspects of your data throughout its entire lifecycle. This includes clear information on:

- What data is being processed
- The purpose of the processing
- How long your data will be retained
- Whether your data will be shared with any third parties (e.g., an accountant),
- Whether your data will be transferred to a Data Controller or Data Processor outside the European Union.

Ensuring transparency helps you understand how your personal data is handled and reinforces trust in the data processing practices.

Transparency also means you have the right to access this information, and we are obligated to make it available to you.

It is important to note that the obligation to provide information has its limits. Transparency does not require us to personally contact every individual whose data we process, but it does ensure that you are always informed about the key aspects of data processing.

Various laws and official guidelines define how this information should be provided. In some cases, businesses with a website—such as ours—can fulfill this obligation by publishing a privacy notice online. However, for certain changes to data processing, we may be required to notify individuals directly, such as via email.

The GDPR also stipulates that if we obtain your personal data from someone other than yourself, we must inform you as soon as possible—at the first point of contact, but no later than within one month.

## II./2 Necessity and proportionality

The restriction of fundamental rights is only permitted when it is both necessary and proportionate. Necessity means that data processing must be essential for achieving the purpose of the processing. Proportionality sets the boundaries for this necessity by requiring that any restriction of fundamental rights and freedoms necessary for data processing must also be proportionate to the intended objective.

The Constitution states that a fundamental right may only be restricted when strictly necessary to enforce another fundamental right or protect a constitutional value. Any restriction must be proportionate to the objective pursued and must respect the essential content of the fundamental right.

When processing your data, we fully adhere to the principle of necessity and proportionality at all times.

### II./3 Purpose limitation

Personal data is collected only for specific, explicit, and legitimate purposes and is not processed in a way that is incompatible with those purposes. This means that before any data processing, we define the purpose and process the data exclusively for that purpose, which will never conflict with the law.

It is important to note that your data may be processed for multiple purposes, with each purpose being regulated separately. For example, your name might initially be used for a quotation request, later for contract fulfillment when you become a customer, and subsequently for invoicing. In these cases, the purposes of processing are clearly distinct: during the quotation request, your data is processed for contract preparation; after placing an order, for contract performance; and after your purchase, to fulfill legal obligations related to invoicing.

Furthermore, data processing may serve multiple purposes at the same time. For example, after fulfilling a contract, documents may be retained based on legitimate interest for potential legal disputes, while the same data may also be processed to meet statutory retention obligations related to invoicing. If the purpose of data processing changes, you will always be informed. Additionally, under the GDPR, further processing for public interest archiving, scientific or historical research, or statistical purposes is not considered incompatible with the original purpose.

### II./4 Data minimization

Personal data is processed in an adequate, relevant, and necessary manner, strictly limited to what is required for its intended purpose. We do not process any data that is not essential to achieving that purpose.

### II./5 Accuracy

Personal data is stored as accurately and up-to-date as possible, based on the best information available to us. We take all reasonable steps to ensure that inaccurate personal data is erased or rectified without delay, considering the purposes for which it is processed. However, unrealistic expectations cannot be imposed on a Data Controller. For example, we cannot call every individual daily to confirm that their name remains unchanged. Nonetheless, if you become aware that your data has changed or has been incorrectly provided to us, and this does not conflict with the purpose of processing, it must be corrected upon your notification.

While we are committed to maintaining data accuracy, you are responsible for informing us if you notice any inaccuracies in the way your data is processed.

### II./6 Storage limitation

Personal data is stored in a way that allows the identification of data subjects only for as long as necessary to fulfill the purpose for which it was collected. Once this period ends, the data is deleted. Our IT systems are designed to automatically remove electronically stored data once the retention period expires. The exact retention periods and data deletion procedures

are regulated in our data processing policy, which we strictly adhere to. We do not store data unnecessarily. Longer retention periods are only applicable if the processing is conducted for purposes of public interest archiving, scientific or historical research, or statistical purposes in accordance with GDPR, and with appropriate technical and organizational measures in place to protect the rights and freedoms of individuals.

## II./7 Integrity and confidentiality

We process your personal data in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage. This is achieved by implementing suitable technical and organizational measures.

Our organizational measures include controlling physical access to our premises, training employees, and securing paper-based records in appropriate facilities. Technical measures include encryption, password protection for access to our systems, and the use of antivirus software.

As part of the process where you provide us with your personal data, it may be transmitted via the internet. While we take all necessary measures to protect your personal data, the security of data transmission over the internet cannot be guaranteed entirely. Consequently, you must acknowledge and accept that any transmission via our website occurs at your own risk. Once your personal data has been received in our systems, we follow strict procedures to ensure security and prevent unauthorized access.

If we provide you with a password (or you choose one) for accessing certain parts of our systems, you are responsible for keeping it confidential. We request that you do not share your password with anyone.

Our websites and social media pages may occasionally contain links to third-party websites, including those of our affiliates or partners. Any data processing conducted on these external sites is not part of our activities.

## II./8 Accountability

The Data Controller is responsible for ensuring compliance with data protection regulations and must be able to demonstrate this compliance. But how is this accountability enforced, and who oversees the Data Controller?

In Hungary, this responsibility primarily falls to the National Authority for Data Protection and Freedom of Information (NAIH). In cases of complaints (or sometimes proactively), the NAIH investigates whether a company's data processing is lawful and complies with all legal requirements.

During an investigation, the Data Controller must provide evidence that all data processing activities are conducted in accordance with the law. A key part of this is maintaining a comprehensive data protection policy that legally governs data processing. However, compliance with this policy is just as important—having a well-drafted policy alone is not enough. The Data Controller has developed a data protection and data security policy for all data processing activities and conducts its data processing in compliance with this policy.

# III. Lawfulness of data processing

When designing our data processing activities, we ensure that the processing complies with the principle of lawfulness. Our data processing is carried out based on the following legal grounds, in accordance with specific detailed rules:

## III./1. Consent of the data subject

You have given your consent for the processing of your personal data for one or more specific purposes. It is essential that consent is voluntary and is always provided through an active expression of will.

## III./2. Performance of a contract

The processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract.

## III./3. Legal obligation

The processing is necessary for compliance with a legal obligation to which we are subject. We only process data under this legal basis when explicitly required by law. If a legal obligation is not mandatory but conditional, we do not rely on this legal basis for processing.

## III./4. Vital interests

The processing is necessary to protect your vital interests or those of another natural person. It is important to note that processing based on vital interests is temporary and continues only as long as the vital interest exists. Once this interest ceases, the handling of the data is regulated separately.

## III./5. Public interest or exercise of official authority

In this case, processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us. However, as we do not qualify as a public authority and do not perform public interest data processing, we currently do not rely on this legal basis.

## III./6. Legitimate interests

The processing is necessary for the legitimate interests pursued by the Data Controller or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms that require the protection of personal data, particularly if you are a child. We frequently process data on this legal basis. For each case, we conduct a balancing test to assess the necessity and proportionality of the processing against your fundamental rights and freedoms.

## IV. Data security

The Data Controller is committed to protecting personal data against loss, unauthorized use, unauthorized transmission, alteration, inaccessibility, or destruction, and takes all necessary measures to maintain the confidentiality of personal data, including the use of appropriate technical and organizational measures.

Organizational measures include controlling physical access to our premises, training employees, and storing paper-based records securely. Technical measures include encryption, password protection for system access, and the use of antivirus software.

When you provide us with your personal data, it may be transmitted over the internet. While we take all necessary measures to protect your personal data, the transmission of data over the internet cannot be entirely secure. You must therefore acknowledge and accept that any data transmitted via our website is at your own risk. Once your data is within our systems, we adhere to strict procedures to maintain its security and prevent unauthorized access. If we provide you with a password (or if you create one), you are responsible for keeping it confidential. Please do not share your password with anyone. Our websites and social media pages may occasionally contain links to third-party websites, including those of our affiliates and partners. Any data processing activities conducted on these external sites fall outside the scope of our operations.

## V. Cookie management

### V./1. What is a Cookie?

A cookie is a small text file placed on your computer when you visit a website. Cookies perform various functions, including collecting information, remembering user preferences, and enabling website owners to understand user behavior to enhance the user experience. You can manage your cookie settings anytime through your browser settings.

### V./2. Why do we use Cookies?

We use cookies for the following purposes:

- To improve our websites,
- To enhance the user experience,
- To facilitate website management,
- To gather information about user behavior,
- To deliver targeted advertisements.

### V./3. What types of cookies do we use?

#### ESSENTIAL COOKIES

Essential cookies are necessary for the proper functioning of our website. They enable basic features such as navigation and access to secure areas of the website. Without these cookies, the website cannot function properly.



## PREFERENCE COOKIES

Preference cookies allow us to remember information that changes the behavior or appearance of the website, such as your preferred language or the region you are in.

## STATISTICAL COOKIES

Statistical cookies help website owners understand how visitors interact with their website by collecting and reporting information anonymously.

## MARKETING COOKIES

Marketing cookies are used to track visitors' website activity. Their purpose is to display relevant advertisements to individual users and encourage engagement, making the website more valuable to both content providers and third-party advertisers. These cookies are used to create user groups for displaying relevant ads and content. The process involves manual intervention. These cookies are stored on your device and are not suitable for identifying individuals. We also use remarketing services, such as Google AdWords remarketing, to deliver personalized advertisements to you. You can disable these cookies through the Google Ads settings manager following the instructions provided there. Learn more about Google's advertising privacy policies by clicking [here](#).

### V./4. Cookie settings

By default, all browsers allow the use of cookies. If you wish to delete cookies from our websites or disable their use, please consult the links below based on the browser you are using:

- [Google Chrome](#)
- [Edge](#)
- [Firefox](#)
- [Microsoft Internet Explorer 11](#)
- [Microsoft Internet Explorer 10](#)
- [Microsoft Internet Explorer 9](#)
- [Microsoft Internet Explorer 8](#)
- [Safari](#)

Please note that disabling cookies may result in certain features or the full functionality of the website becoming unavailable.

### V./5. Cookie data processing information

#### PURPOSE OF DATA PROCESSING

For cookies essential for website operation: Ensuring the proper functioning of the website.  
For other cookies:

- Improving our website,
- Facilitating navigation and feature usage for a seamless user experience,
- Collecting information about website usage,
- Placing targeted advertisements on other websites (remarketing),
- Monitoring website activities to deliver relevant offers of interest,
- Sending personalized offers to the contact details provided during registration.

## LEGAL BASIS FOR DATA PROCESSING

For cookies essential for website operation:

The legal basis for processing is Article 6(1)(f) of the GDPR: “Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party.”

For other cookies:

The consent of the data subject as per Article 6(1)(a) of the GDPR: “The data subject has given consent to the processing of their personal data for one or more specific purposes.”

## LEGITIMATE INTEREST JUSTIFICATION

Without cookies, the website cannot fully function in all its features, and its purpose cannot be achieved. Additionally, the website must be protected from potential attacks. As such, the Data Controller has a compelling legitimate interest in recording the online identifiers (IP addresses) and other browsing-related personal data (e.g., browsing timestamp, browser type, characteristics of the device’s operating system such as type and language settings). This helps prevent external attacks on the website and public electronic services. Therefore, the website operator’s legitimate interest supports the use of cookies essential for operation.

## CATEGORIES OF DATA SUBJECTS

Natural persons visiting the website.

## CATEGORIES OF PERSONAL DATA

Online identifiers of website visitors (e.g., IP addresses).

Other personal data generated during browsing (e.g., browsing timestamp, browser type, certain characteristics of the operating system, such as type and language settings).

## COOKIE NAMES, PROVIDERS, PURPOSES, TYPES, AND DURATION OF DATA PROCESSING

For detailed and up-to-date information on this, click on the cookie information link at the bottom of the website.

## MANDATORY DATA PROVISION AND CONSEQUENCES OF NON-PROVISION

For cookies essential for website operation: Yes, it is mandatory. Without these cookies, you cannot access or use the website properly.

For other cookies: Enabling these cookies is optional.

## AUTOMATED DECISION-MAKING

Automated decision-making processes are likely to occur during data processing for this purpose by the Data Controller.

# VI. Individual data processing operations

- VI./1. Data processing for information requests, service inquiries, and quotation requests (via email, online, postal mail, telephone, or in-person)

The Data Controller processes data related to inquiries from potential clients in accordance with the provisions outlined in this section. This includes both online and offline inquiries, such as requests for information made in person, by mail, by telephone, or via email. These inquiries are conducted to facilitate the fulfillment of contracts that may be concluded at a

later stage, and the legal basis for processing is selected accordingly. Our company strives to minimize data processing even in this activity.

#### PURPOSE OF DATA PROCESSING

To respond to questions related to contract fulfillment from potential clients/guests/hotel guests and to provide quotations as part of the preparation for entering into a future contract.

#### LEGAL BASIS FOR DATA PROCESSING

Article 6(1)(b) of the GDPR, specifically: "Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract."

#### CATEGORIES OF DATA SUBJECTS

Individuals requesting information, inquiring about services/membership, or requesting quotations.

#### CATEGORIES OF PERSONAL DATA

Name, email address, phone number.

#### DATA RETENTION PERIOD

Until withdrawn by the data subject.

In case of product availability, until the product becomes available.

For information requests, until the response is provided.

For quotations, until the acceptance or rejection of the quotation or until the expiration of the quotation's validity period.

#### IS PROVIDING PERSONAL DATA MANDATORY?

No, but:

Without a name, we cannot address you.

Without an email address, we cannot notify you about product availability.

Without an email address, we cannot send a quotation.

Without a phone number, we cannot call you back or discuss details in person.

#### RECIPIENTS OF PERSONAL DATA

Email service providers.

#### TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

No data is transferred to third countries or international organizations for this purpose.

#### AUTOMATED DECISION-MAKING

No automated decision-making occurs during the processing of data for this purpose.

## VI./2. Data processing related to contract fulfillment

The Data Controller provides services based on contracts concluded between the parties. This section regulates data processing necessary for contract fulfillment. It includes all data processing activities performed due to contractual relationships (whether written, verbal, or implied by conduct), regardless of whether the company provides or receives the service.

This section does not include data processing related to employment contracts, which is covered under the “Internal Data Processing” section of this privacy policy.

#### PURPOSE OF DATA PROCESSING

To enter into contracts, fulfill contractual obligations, and exercise contractual rights.

#### LEGAL BASIS FOR DATA PROCESSING

Article 6(1)(b) of the GDPR: “Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract.”

#### CATEGORIES OF DATA SUBJECTS

Natural persons who are contracting parties.

#### CATEGORIES OF PERSONAL DATA

Name, address, place and date of birth, mother’s name, phone number, email address, and other data specified in the contract.

#### DATA RETENTION PERIOD

Until the fulfillment of the contract or, in case of termination for any reason, until the contract’s termination.

#### IS PROVIDING PERSONAL DATA MANDATORY?

Yes, as the absence of data prevents the conclusion of the contract.

#### RECIPIENTS OF PERSONAL DATA

Accountants.

Postal and courier services.

Email and SMS service providers.

Other subcontractors or auxiliary parties involved in contract fulfillment, with prior notification.

#### TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

No data is transferred to third countries or international organizations for this purpose.

#### AUTOMATED DECISION-MAKING

No automated decision-making occurs during the processing of data for this purpose.

### VI./3. Data processing related to invoicing and accounting

#### PURPOSE OF DATA PROCESSING

To retain invoicing and accounting data to comply with legal obligations under accounting laws.

#### LEGAL BASIS FOR DATA PROCESSING

Article 6(1)(c) of the GDPR: “Processing is necessary for compliance with a legal obligation to which the controller is subject.”

Hungarian Accounting Act Section 169 (1)–(6).

#### CATEGORIES OF DATA SUBJECTS

Hotel guests and others involved in accounting processes (e.g., the actual payer).

#### CATEGORIES OF PERSONAL DATA

Name, address, and other data prescribed by law or requested by the client for inclusion on the invoice.

#### DATA RETENTION PERIOD

As specified by law, generally 8 years.

#### IS PROVIDING PERSONAL DATA MANDATORY?

Yes, as the absence of data prevents compliance with legal obligations.

#### RECIPIENTS OF PERSONAL DATA

Accountants.

Supervisory authorities.

Email service providers.

Postal services.

Credit card payment service providers.

Banks.

#### TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

No data is transferred to third countries or international organizations for this purpose.

#### AUTOMATED DECISION-MAKING

No automated decision-making occurs during the processing of data for this purpose.

### VI./4. Data processing related to complaint handling

#### PURPOSE OF DATA PROCESSING

To fulfill legal obligations related to warranty and guarantee claims and to handle other complaints.

#### LEGAL BASIS FOR DATA PROCESSING

Article 6(1)(c) of the GDPR: "Processing is necessary for compliance with a legal obligation to which the controller is subject."

Hungarian Accounting Act Section 17/A(7): "The business must retain the complaint log and a copy of the response for five years and present them to the supervisory authorities upon request."

#### CATEGORIES OF DATA SUBJECTS

Individuals lodging warranty and guarantee claims or other complaints.

#### CATEGORIES OF PERSONAL DATA

Name, address, and other data required by law or provided by the complainant.

#### DATA RETENTION PERIOD

As specified by law, generally 5 years.

#### IS PROVIDING PERSONAL DATA MANDATORY?

Yes, as the absence of data prevents complaint resolution and compliance with legal obligations.

#### RECIPIENTS OF PERSONAL DATA

Email service providers.

Postal and courier services.

Authorities and courts.

#### TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

No data is transferred to third countries or international organizations for this purpose.

#### AUTOMATED DECISION-MAKING

No automated decision-making occurs during the processing of data for this purpose.

### VI./5. Data processing related to lost and found items

#### PURPOSE OF DATA PROCESSING

To handle lost property in accordance with legal regulations and return it to the rightful owner.

#### LEGAL BASIS FOR DATA PROCESSING

Article 6(1)(c) of the GDPR: "Processing is necessary for compliance with a legal obligation to which the controller is subject."

Hungarian Civil Code Section 5:55(1).

#### CATEGORIES OF DATA SUBJECTS

Rightful owners of lost items.

#### CATEGORIES OF PERSONAL DATA

Name, contact details, and personal data found on the lost item.

#### DATA RETENTION PERIOD

8 days from the date of discovery.

#### IS PROVIDING PERSONAL DATA MANDATORY?

Yes, as the absence of data prevents compliance with legal obligations.

#### RECIPIENTS OF PERSONAL DATA

Notaries.

Postal and courier services.

#### TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

No data is transferred to third countries or international organizations for this purpose.

#### AUTOMATED DECISION-MAKING

No automated decision-making occurs during the processing of data for this purpose.

## VI./6. Data processing for job applicants

### PURPOSE OF DATA PROCESSING

To facilitate job applications and fill vacant positions.

### LEGAL BASIS FOR DATA PROCESSING

The Data Controller processes the necessary data in compliance with the GDPR to prepare for a future contract.

Article 6(1)(b) of the GDPR, specifically: "Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract."

### CATEGORIES OF DATA SUBJECTS

Job applicants.

### CATEGORIES OF PERSONAL DATA

Name, phone number, and email address for communication.

Required data based on the conditions outlined in the job posting.

Other data voluntarily provided by the applicant beyond the stated requirements.

### DATA RETENTION PERIOD

Until the position is filled or the recruitment process concludes, but no longer than 3 months, unless withdrawn by the data subject.

### RECIPIENTS OF PERSONAL DATA

Email service providers.

### IS PROVIDING PERSONAL DATA MANDATORY?

No. However:

Without the minimum data specified in the job posting, the application cannot be evaluated.

Without contact information, the applicant cannot be notified.

Voluntary data submission is not mandatory and does not affect the application process.

### TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

No data is transferred to third countries or international organizations for this purpose.

### AUTOMATED DECISION-MAKING

No automated decision-making occurs during the processing of data for this purpose.

## VI./7. Data processing of camera recordings at the accommodation premises

Cameras are installed and operational within the accommodation premises for the purpose of protecting life, physical safety, and property. These cameras record video footage. The reason for installation is the presence of high-value equipment and machinery within the premises and the importance of safeguarding guests' physical safety and belongings.

The rules governing the camera system and the balancing test are defined in a separate policy.



## VI./8. Data processing related to the NTAK system

The Data Controller processes statistical data in a manner that does not allow personal identification. Based on Act CLVI of 2016 and tourism legislation, mandatory data must be provided to the National Tourism Data Supply Centre (NTAK) as specified by law.

### PURPOSE AND LEGAL BASIS OF DATA PROCESSING

In compliance with Government Decree 235/2019 (X.15) on the implementation of the Act on the Development of Tourism Areas, our hotel provides continuous data reporting. The data provided as part of daily reporting is statistical and does not contain personal information about guests.

### DATA PROCESSOR

National Tourism Data Supply Centre.

The tourism hosting provider, as the data processor for the accommodation provider:

- a) Processes guest data exclusively as instructed by the accommodation provider and only performs operations specified in the Tourism Act and this section.
- b) Ensures that its employees involved in tourism hosting services are bound by confidentiality obligations concerning guest data.
- c) Implements appropriate technical and organizational measures considering the state of science and technology, implementation costs, the nature, scope, context, and purpose of data processing, as well as the varying likelihood and severity of risks to individuals' rights and freedoms, to guarantee a level of data security proportionate to the risks, including encryption. This ensures that neither the tourism hosting provider nor its employees have access to guest data.
- d) May not involve additional data processors without the prior written specific or general authorization of the accommodation provider.
- e) Assists the accommodation provider, as much as possible, in fulfilling obligations related to the exercise of the rights of data subjects.
- f) Supports the accommodation provider in meeting data security and incident management obligations based on the nature of the data processing and the information available to the processor.
- g) Handles guest data and its copies according to the instructions of the accommodation provider following the termination of the data processor relationship, except where the retention of data is mandated by law or European Union legal acts.
- h) Provides all necessary information to the accommodation provider to demonstrate compliance with obligations defined in the data processing agreement, enabling and facilitating audits, including on-site inspections, by the accommodation provider or an authorized representative.
- i) Immediately informs the accommodation provider if it considers any of its instructions to be in breach of data protection regulations.

The IT system operated by the tourism hosting provider stores guest data in encrypted form.



VI./9. Data processing related to reservations  
(via email and online systems)

PURPOSE OF DATA PROCESSING

Our company provides the opportunity for online room reservations at Maison45 Hotel to ensure a fast, convenient, and cost-free booking process.

LEGAL BASIS FOR DATA PROCESSING

The prior consent of the individual making the reservation.

CATEGORIES OF DATA SUBJECTS

Natural persons making reservations.

CATEGORIES OF PERSONAL DATA

Name, address, email address, phone number, credit card details, Szép Card details, personal identification document details (document number, nationality, date of birth, name, address), vehicle license plate number.

RETENTION PERIOD FOR DATA PROCESSED FOR THIS PURPOSE

Two years following the last day of the stay as per the reservation.

IS PROVIDING PERSONAL DATA MANDATORY?

No. However, without providing personal data, a reservation contract for the accommodation cannot be established.

RECIPIENTS OF PERSONAL DATA

Data processors.

DATA PROCESSOR

Our company uses IT service providers for operating the online reservation system, as follows:

Data processing task: Ensuring the functionality of the online reservation module and the pre-arrival email module through the SabeeApp system (operated by its branch office at 1074 Budapest, Dohány u. 12-14. 7th floor).

By accepting the data processing notice during the online reservation, the data subject expressly consents to the Data Processor involving additional data processors to make the service more convenient and personalized.

AUTOMATED DECISION-MAKING NOTICE

No automated decision-making occurs during the processing of data for this purpose.

ADDITIONAL INFORMATION ON DATA PROCESSING

- By making a reservation, the data subject also declares that the provided data is accurate and that they are over the age of 16.
- Practical and relevant information, including weather forecasts, program recommendations, and online check-in options, are shared with guests to assist in trip preparation and reduce check-in time upon arrival. Before arrival, a “pre-arrival email” containing information about the accommodation, travel, and program opportunities is sent to guests. Based on this email, guests can fill out an online registration form to expedite their check-in process at arrival.

- Our company takes all necessary technical and organizational measures to prevent potential data breaches (e.g., loss, damage, or unauthorized access to files containing personal data). In the event of a data breach, we maintain a record to monitor necessary measures, which includes details about the personal data affected, the scope and number of individuals impacted, the time and circumstances of the breach, its effects, and the measures taken to mitigate it, along with any other information required by applicable laws.
- Our company has a data processing agreement with the Data Processor, which ensures that the Processor applies mandatory data protection and processing safeguards for any additional processors involved. This guarantees the lawful handling of personal data by the Data Processor as well.

#### VI./10. Data processing for guest satisfaction surveys

##### PURPOSE OF DATA PROCESSING:

To request feedback from guests regarding their experiences during their stay at our hotel, aimed at improving and enhancing our services.

##### LEGAL BASIS FOR DATA PROCESSING:

The legitimate interest of the accommodation provider – Article 6(1)(f) of the GDPR.

##### LEGITIMATE INTEREST DESCRIPTION:

Our company has a legitimate interest in obtaining feedback to improve services based on guests' opinions.

##### CATEGORIES OF DATA SUBJECTS:

Natural persons who made reservations.

##### CATEGORIES OF PERSONAL DATA:

Name, gender, email address.

##### RETENTION PERIOD FOR DATA PROCESSED FOR THIS PURPOSE:

One year after the last day of the stay as per the reservation.

##### IS PROVIDING PERSONAL DATA MANDATORY?

No. However, the data subject will not receive a satisfaction survey from our company.

##### DATA PROCESSOR INVOLVEMENT:

Our company uses IT service providers for the online accommodation system, specifically for operating the satisfaction survey module.

#### VI./11. Data processing for use of social media platforms

Maison45 KFT. uses the following social media platforms:

- Instagram

Please note that in addition to our company, the operators of these platforms also act as independent Data Controllers, conducting data processing activities. While we cannot influence the operators' activities in most cases, we support compliant data processing within our available options.

Data provided on our social media platforms (e.g., links, images, comments, videos, news) are made public and accessible by the platform. Our company does not use this data for any other purpose. Content may occasionally be shared on our platforms (via the Share button), provided the platform allows it.

#### PURPOSE OF DATA PROCESSING

To facilitate our communication activities.

#### LEGAL BASIS FOR DATA PROCESSING

The legitimate interest of the accommodation provider – Article 6(1)(f) of the GDPR, aimed at supporting communication.

#### CATEGORIES OF DATA SUBJECTS

Natural persons active on social media platforms.

#### CATEGORIES OF PERSONAL DATA

Links, images, videos, comments, profile names.

#### DATA PROCESSOR

The Data Controller does not employ a Data Processor.

For further information regarding the operators' data processing practices and objections to data processing, please refer to the following privacy policies:

- [Instagram Privacy Policy](#)

#### VI./12. Data processing for newsletters and marketing communications

#### PURPOSE OF DATA PROCESSING

To inform potential clients about the current offers and promotions of the accommodation.

#### LEGAL BASIS FOR DATA PROCESSING:

Consent of the data subjects under Article 6(1)(a) of the GDPR.

#### CATEGORIES OF DATA SUBJECTS:

Subscribers to the newsletter.

#### CATEGORIES OF PERSONAL DATA:

Name, email address, phone number.

#### RETENTION PERIOD FOR DATA PROCESSED FOR THIS PURPOSE:

Until the data subject withdraws their consent.

#### IS PROVIDING PERSONAL DATA MANDATORY?

No.

Without a name, we cannot address the individual.

Without an email address, we cannot notify the individual of offers or promotions.

Without an email address, we cannot send quotes.

Without a phone number, we cannot call back or discuss matters in person.

#### RECIPIENTS OF PERSONAL DATA

Email service provider, joint Data Controller, data processor.

#### DATA PROCESSOR

Our company uses an IT service provider for newsletter distribution with the following tasks:

Data processor task: Storage of the newsletter distribution database.

By accepting this data processing notice, the data subject explicitly consents to the Data Processor involving additional processors to make the service more convenient and personalized.

#### IS DATA TRANSFERRED TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS?

No data is transferred to third countries or international organizations for this purpose.

#### AUTOMATED DECISION-MAKING NOTICE

No automated decision-making occurs during the processing of data for this purpose.

### VI./13. Data processing related to website server logging

#### PURPOSE OF DATA PROCESSING

To monitor the operation of services and prevent misuse by recording visitor data during website visits.

#### LEGAL BASIS FOR DATA PROCESSING

The legitimate interest of the accommodation provider under Article 6(1)(f) of the GDPR. Our company has a legitimate interest in ensuring the secure operation of the website.

#### CATEGORIES OF DATA SUBJECTS

Any natural person visiting the website.

#### CATEGORIES OF PERSONAL DATA

Identifier number, date, time, and the URL of the visited page.

#### RETENTION PERIOD FOR DATA PROCESSED FOR THIS PURPOSE

Up to 90 days.

#### EXTERNAL SERVICE PROVIDERS INVOLVED IN LOGGING

The portal's HTML code contains references and links to external servers, independent of our company. These servers communicate directly with the user's computer. Please note that the operators of these references may collect user data (e.g., IP address, browser type, operating system details, mouse movement, visited page URLs, and time of visit) during this interaction.

IP Address: This numerical sequence can uniquely identify devices connected to the internet. It can be used to geographically locate the user.

Collected Data: The visited pages, dates, and times alone cannot identify individuals, but combined with other data (e.g., registration details) they may allow conclusions about the user.

#### VI./14. Dormant data processing (during statute of limitations)

##### PURPOSE OF DATA PROCESSING

To provide evidence in administrative or legal proceedings for enforcing rights after contract performance.

##### LEGAL BASIS FOR DATA PROCESSING

The Data Controller has a legitimate interest in processing data after contract performance, which is lawful under:

Article 6(1)(f) of the GDPR: "Processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party."

For special categories of personal data, Article 9(2)(f) of the GDPR: "Processing is necessary for the establishment, exercise, or defense of legal claims or whenever courts are acting in their judicial capacity."

##### JUSTIFICATION OF LEGITIMATE INTEREST

The Data Controller has a legitimate interest in reconstructing events and ensuring proper evidence during administrative or legal proceedings. After identifying the legitimate interest, a balancing test was conducted, confirming the legality of the data processing.

##### CATEGORIES OF DATA SUBJECTS

Private individuals in contractual relationships.

Representatives of non-private contractual parties, their authorized persons, and contact persons.

##### CATEGORIES OF PERSONAL DATA

Name, address, place and date of birth, mother's name, email, phone number, mailing address, and other data provided for performance or necessary for asserting claims, which may include special categories such as health-related data.

##### RETENTION PERIOD FOR DATA PROCESSED FOR THIS PURPOSE

Until the end of the statute of limitations, typically 5 years.

Based on Civil Code Section 6:22 (1), this is 5 years after the performance or termination of the contract unless a different period is specified by law.

Other data will only be retained if they are essential for the case or for substantiating actions in later proceedings.

##### IS PROVIDING PERSONAL DATA MANDATORY?

Yes. Without the data, we cannot enter into a contract.

##### RECIPIENTS OF PERSONAL DATA

Email service provider, authorities, courts, and legal representatives.

IS DATA TRANSFERRED TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS?  
No data is transferred to third countries or international organizations for this purpose.

AUTOMATED DECISION-MAKING NOTICE

No automated decision-making occurs during the processing of data for this purpose.

## VII. Your rights

If you wish to exercise your rights (e.g., request the transfer, deletion, or rectification of your data), please feel free to contact us using any of our provided contact details or by completing the form at the end of this section. You are entitled to the following rights:

### VII./1. Right to information

We are obligated to provide information about the essential aspects of data processing (e.g., what, for what purpose, how, and for how long your data will be used) in an appropriately clear, concise, and accessible manner. The GDPR specifies the scope of necessary information. Ideally, this information should be provided before the collection of personal data. If this is not possible—e.g., if the data is obtained from a third party—it will be provided at the earliest opportunity.

You can find more details about the right to information in Articles 13-14 of the GDPR.

### VII./2. Right of access

You have the right to request confirmation as to whether your personal data is being processed and, if so, to access information about which of your data is being processed and under what conditions. The accessible conditions are detailed under the right to information. You can find more about the right of access in Article 15 of the GDPR.

### VII./3. Right to rectification

You have the right to notify us if the data we process is inaccurate and to request correction. If you become aware that your data is incorrect or inaccurate, please inform us as soon as possible, and we will rectify it.

You can find more about the right to rectification in Articles 16 and 19 of the GDPR.

### VII./4. Right to erasure

Under certain circumstances and conditions outlined by law, you have the right to request the deletion of your data from our database. For instance, this may apply if the personal data is no longer necessary for the purpose for which it was collected or if you withdraw your consent and there is no other legal basis for processing.

However, there are cases where we are required to deny the deletion of data. For example, if

legal obligations mandate data retention (e.g., billing data must generally be retained for eight years under applicable laws) or if legitimate interests, such as potential future legal claims within the statute of limitations, require retention. Beyond these examples, many cases justify lawful data processing despite objections. As with all matters of data protection, each case must be assessed individually to determine whether denying a request for deletion is lawful. You can find more about the right to erasure in Articles 17 and 19 of the GDPR.

#### VII./5. Right to restriction of processing

Under certain circumstances and conditions, you have the right to request that the processing of your data be restricted for a specified period (as determined by law). Except for statutory exceptions, data subject to restriction may only be stored and not otherwise processed. If the restriction is lifted, you will be notified.

You may request restriction in the following cases:

- You contest the accuracy of the personal data; restriction applies for the period necessary to verify its accuracy.
- If processing is unlawful, but you oppose erasure and instead request restricted use of the data.
- The Data Controller no longer needs the personal data for processing purposes, but you require it for legal claims.
- You object to the processing; restriction applies until it is determined whether the Data Controller's legitimate grounds override your interests.

You can find more about the right to restriction in Articles 18 and 19 of the GDPR.

#### VII./6. Right to data portability

You have the right to receive the personal data concerning you in a structured, commonly used, and machine-readable format (e.g., .doc, .pdf, etc.) and to transmit it to another Data Controller without hindrance from the original Data Controller. This right facilitates the transfer of your data between Data Controllers. However, this is only possible if the processing is carried out by automated means.

You can find more about the right to data portability in Article 20 of the GDPR.

#### VII./7. Right to object

You have the right to object to certain types of data processing. If you object, we may not process your personal data unless we demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or if the data is necessary for the establishment, exercise, or defense of legal claims.

You also have the right to request that automated decision-making not apply to you, provided it is not necessary for entering into or performing a contract with us and is not mandated by law. You can find more about the right to object and automated decision-making in Articles 21-22 of the GDPR.

## VIII. Remedies

First, contact us directly—we will do our best to resolve your issue! If you are not satisfied or prefer not to involve us, you may contact the data protection authority or initiate court proceedings.

Contact information for the Hungarian Data Protection Authority (NAIH):

- Postal address: 1363 Budapest, Pf.: 9.
- Address: 1055 Budapest, Falk Miksa u. 9-11.
- Phone: +36 (1) 391-1400
- Fax: +36 (1) 391-1410
- Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)
- Website: <https://naih.hu>

Right to Court proceedings:

If your rights have been violated, you may file a lawsuit against the Data Controller. You can initiate the proceedings at the court of your residence or domicile.

## IX. Validity of this Policy

This policy is effective from October 1, 2024, until revoked.