

Information on data handling operations by Hotel Museum Budapest****

Next Kft. (registered seat: H-1088 Budapest, Trefort u. 2., Company reg. number: 01-09-663333, tax ID number: 12293830-2-42, phone: +36 1 318 1491, e-mail: next.kft@museumhotel.hu, represented by Dr. Marco Altan/Alessandro Santin as sole signatory, in his capacity as Managing Director) in its capacity as data controller respects the privacy of its clients and all other natural persons (hereinafter: data subjects) in relation to data handling and enforces such rights to privacy, and for this reason, it informs the data subjects that it respects the personality rights of the data subjects, and in processing their data, it will proceed in accordance with the provisions of Hungarian substantial and procedural laws in force, the Internal Data Protection Policy and other internal regulations in force.

This Privacy Notice is an abridged version of the Internal Data Protection Policy of the Data Controller (hereinafter: Policy), created with the purpose of providing a brief information for the data subjects about the various data handling operations performed by the Data Controller and the rules applicable in this respect. This document is to be regarded as an annex to the Policy. Issues and topics not covered in the Notice are governed by the Policy and the provisions of applicable statutory regulations, and these shall be construed in view of such provisions. The Notice and the Policy are available for inspection in full on a continuous basis at the actual site of data handling, namely at the address of H1088 Budapest, Trefort u. 2.

With a view to clarity, information is presented in a FAQ-format and where possible, in a table format, with examples as and where necessary. Clarity is also ensured by presenting each data handling operation at a separate page, rendering it suitable for providing information on their own, as regards key information. The various data handling operations fulfil the obligation to provide information as set forth in Articles 13-14 of GDPR.

Who are the data subjects?

Data subjects include: Data subjects are definite natural persons identified by their personal data or who are identifiable, directly or indirectly, by way of such personal data, when handled by the Data Controller. Thus, data subjects are primarily the interested parties, natural person clients, the employees of the company, the natural person Partners of the Data Controller, non-natural person Partner representatives, their contact persons and their employees. The range of data subjects is clearly defined for the purposes of the various data procession operations.

Who will process my data?

Data are processed by the Employees of the Data Controller, to the extent it is required for the performance of their work only.

Will the Data Controller transfer or deliver data to a third party?

Personal data are processed by the Data Controller by default, or where the job is contracted out, then the data are processed by the Data Processing Entity or Entities defined in Annex 1 to the Policy. In this case, the Data Controller will transfer data to the Data Processing Entities, and the Data Controller will bear responsibility for the actions of the Data Processing Entities.

The Data Controller may transfer the data defined by the data subjects to its Partners only where the legal grounds of data processing are clear (e.g. the data subject had preliminarily and voluntarily consented to such data procession), and the data is necessary for the data processing operations.

What rights do I have in this regard?

Pursuant to the Hungarian Info Act and Decree No. 2016/679 of the European Parliament and the Council (EU), the data subjects have the following rights: the right of information, the right of correction, the right of erasure, the “right to be forgotten”, the right of blocking/restricting data, the right to object, the right to resort to court action, and the right to resort to authorities.

The various rights are described in detail with their limitations in the Policy.

Where and how can I seek detailed information on the handling, transferring of data and where and how can I exercise my rights?

The Data Controller notes to the data subjects that they may send their requests for information or may exercise their above rights, unless restricted under the law, by sending their statements or notices to the e-mail address next.kft@museumhotel.hu or any other contact option of the Data Controller. The Data Controller will examine and provide an answer to the statement or notice within the shortest possible time of the receipt of such statement or notice not exceeding 15 days, and will take steps in accordance with the statement, the Policy, and the provisions of laws. In case of joint data procession, the data subject may exercise its rights by contacting any of the data processing entities.

To which authority can I resort to in the event of breach of my rights of self-determination?

The competent authority is the National Authority of Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság)

Address: H-1125 Budapest, Szilágyi Erzsébet fasor 22/c

Phone: +36 (1) 391-1400 Fax:

+36 (1) 391-1410 website:

<http://www.naih.hu>

e-mail: ugyfelszolgalat@naih.hu

In case of content jeopardising minors, suitable for raising hatred, or of discriminating nature, as well as requests for remedying errors in data, rights of deceased persons, or violating good reputation of persons or entities:

The competent authority is the National Media and Telecommunications Authority (Nemzeti Média- és Hírközlési Hatóság).

H-1015 Budapest, Ostrom u. 23-25.

Mailing address: 1525. Pf. 75

Phone: +36-1-4577100

Fax: +36-1-3565520

E-mail: info@nmhh.hu

Data subjects may resort to court in case of violation of their rights. Courts will proceed in such cases with priority. The responsibility of proving that data processing is performed in accordance with statutory regulations shall be with the Data Controller.

Should the Data Controller violate the personality rights of a data subject by unlawful handling of the data of data subjects or by violating the requirements of data security, the data subject may seek damages from the Data Controller.

How does the Data Controller ensure the security of my data?

The Data Controller shall guarantee the security of data. To this end, it will take the technical and organisational measures and formulate the procedural rules necessary for the enforcement of the provisions of applicable laws, and data and confidentiality regulations.

The Data Controller will use appropriate measures to protect data from unauthorised access, change, transfer, disclosure, erasure or destruction and accidental destruction and damage, and against inaccessibility on account of change of access technology.

The Data Controller will enforce the data security regulations also by way of the Internal Data Protection Policy and internal policies, guidelines and procedural rules deviating from this Privacy Notice in terms of content and form.

The Data Controller, in setting and applying the measures for the security of data, will take due heed to the current level of technology, and will select the data handling solution that is capable of providing a higher level of protection for the personal data, except where it poses unreasonable difficulties.

In the context of its tasks within IT protection, the Data Controller will in particular arrange for:

- Having appropriate measures in place for the protection against unauthorised access, including also the protection of software and hardware items, and their physical protection (protection against access, network protection);
- Taking measures for the restoration of data files, including regular backups, and separate and safe handling of data copies (mirroring, backup);
- The protection of data files against viruses (virus protection);
- The protection of physical data files and their carriers, including protection against damage from fire, waters, lightning and other natural disasters, and for the recovery of damaged items arising from such events (archiving, protection against fire).

Other information

Information as per Article 30 (1) (d) of the GDPR: Personal data are primarily processed by the Data Controller, or Personal data are processed by the Data Controller by default, or where the job is contracted out, then the data are processed by the Data Processing Entity or Entities defined in Annex 1 to the Policy. In this case, the Data Controller will transfer data to the Data Processing Entities, and the Data Controller will bear responsibility for the actions of the Data Processing Entities.

Information as per Article 30 (1) (g) of the GDPR: The Data Controller shall guarantee the security of data. To this end, it will take the technical and organisational measures and formulate the procedural rules necessary for the enforcement of the provisions of applicable laws, and data and confidentiality regulations.

Completed: 1st June, 2018

Dr. Marco Altan/Alessandro Santin
Managing Director
Next Kft.