**Győr-Sopron-Ebenfurti Railways Private Company Limited by Shares**

**HOTEL SOPRON**

[www.hotelsopron.hu](http://www.hotelsopron.hu)

PRIVACY POLICY

25th May 2018

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**1. INTRODUCTION**

Győr-Sopron-Ebenfurti Vasút Zártkörűen Működő Részvénytársaság (in English: Győr-Sopron-Ebenfurti Railways Private Company Limited by Shares), Hotel Sopron (H-9400 Sopron, Mátyás király u. 19, Seat: H-9400 Sopron, Fövényverem u. 7.,Operated by: Győr-Sopron-Ebenfurti Railways Private Company Limited by Shares, hereinafter referred to as Hotel Sopron, the data controller), as data controller agrees to be bound by the contents of this Privacy Policy and ensures that all data processing related to its business complies with the requirements set out in this Privacy Policy as well as in the relevant European and national legislation.

The data protection guidelines being in connection with the data processing activities of Hotel Sopron can be accessed under <http://www.hotelsopron.hu/adatkezeles>.

Hotel Sopron reserves the right to modify the contents of this Privacy Policy and notifies its partners of any modifications made in due time.

Should you have any questions to this Privacy Policy, please contact us at [tarvai@gysev.hu](mailto:tarvai@gysev.hu) and our colleague will be ready to help you.

Hotel Sopron is committed to the protection of the personal data of its customers and partners and highly respects the right of informational self-determination of its customers. Hotel Sopron treats personal data as confidential and takes all safety, technical and organisational measures to guarantee the protection of data.

Hotel Sopron sets out its data processing activity below.

**2.** **EFFECTIVE LEGISLATION ON THE PROTECTION OF DATA** **GOVERNING THE ACTIVITIES OF** **HOTEL SOPRON**

Our data processing principles are in line with existing data protection laws, in particular with the following:

Act CXII of 2011 – on informational self-determination and freedom of information (Privacy Act);

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 - GDPR);

Act V of 2013 – on the Civil Code;

Act C of 2000 – on Accounting;

Act XLVIII of 2008 on essential conditions of and certain limitations to business advertising;

Act CXIX of 1995 on the use of name and address information serving the purposes of research and direct marketing;

Act II of 2007 – on the admission and right of residence of third-country nationals;

Act C of 1990 – on local taxes;

Act CL of 2017 – on the rules of taxation;

Act CLXIV of 2005 – on trade;

Decree 55/2011 (XII. 29.) of the GA of the Municipality of Sopron – on tourist tax;

**3. DEFINITIONS**

* **(Data) processor:** a person, organization or business **handling personal data for and on behalf of the data controller**.
* **Data processing: Any operation performed** **on personal data** or data files, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, transmission, dissemination or otherwise making available, restriction, erasure or destruction etc.
* **Data subject:** any specific **natural person identified** or **identifiable by personal data**, i.e. **You**.
* **Consent of the data subject: Having received adequate information**, the data subject – i.e. **You** – **give your consent freely, clearly and unambiguously to the processing of your personal data** by a statement or a specific clear affirmative action.
* **Legitimate interest: the existence of a specific benefit** that is **directly attributable** **to the** **data processing** of the data controller or another person and is justified **in accordance with** the relevant **legislation**. The relevant specific definitions are given in section 5 and its subsections.
* **Adequate information:** **information** provided to you about your **rights**, the consequences of giving your consent and the **possible consequences** of you refusing consent or not delivering the personal data expected from you.
* **Personal data: any information about you suitable for your identification**; for example your name, personal ID number, location data, online ID number, one or more piece of data referring to your body or your physiological, genetic, intellectual, economic, cultural or social status;

**4. SCOPE OF PERSONAL DATA. PURPOSE, LEGAL GROUNDS AND DURATION OF DATA PROCESSING**

The data processing activities of Hotel Sopron are based on the following:

1. the consent of the data subject, Art. 6 (1) a) of GDPR;
2. the performance of a contract, Art. 6 (1) b) of GDPR;
3. compliance with a legal obligation to which the controller is subject, Art. 6 (1) c) of GDPR;
4. a legitimate interests pursued by the controller, Art. 6 (1) f) of GDPR;

In case of data processing based on the consent of the data subject – i.e. yourself – you may revoke your consent at any stage of the data processing.

If the data processing is based on your consent, Hotel Sopron may process the recorded data without your further separate consent and also after the revocation of your consent, provided this is necessary for the fulfilment of a legal obligation or for the enforcement of the legitimate interest of a person other than the data controller or the data subject.

The data controller will transfer your personal data to a third party only in the case of a statutory provision or if – after proper notification – you have given prior consent to it.

The data controller will not use the personal data for purposes other than those indicated. Personal data may be processed by the employees of the data controller only to the extent and for a time indispensable to perform their duties.

In some cases, the processing, storage and transmission of a part of the data provided are mandatory by law. We will notify our partners of such cases separately.

**5. PROCESSING OF CUSTOMER DATA**

**5.1. NEWSLETTER**

*Purpose of data processing:* Information about current programs and offers as well as maintaining contact with guests.

*Scope of data subjects:* Anyone inquiring about or booking a room at Hotel Sopron.

*Source of data processed:* data subject, Szállás.hu.

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Name and e-mail of the recipient of the newsletter | Direct Marketing | a) consent of the data subject | until unsubscription | * to send newsletters |
| Maintaining business contact | a) consent of the data subject | until unsubscription |
| Name and e-mail of the person making an advance booking | Sending a welcome e-mail (information on other services) | d) enforcement of a legitimate interest: economic interest, recommending other services | until the sending of this e-mail | * to send a welcome e-mail from Hostware |
| Name and e-mail of the guest who has checked out | Sending an evaluation form via e-mail | d) enforcement of a legitimate interest:  improvement of services based in guest evaluation | 2 years after checking out | * Sending an evaluation form via e-mail * Recorded in ResNWeb system for statistics purposes |
| Invitation to Frequent Guest Program | a) consent of the data subject | until revocation of the consent  3 years in Outlook | * Registration in the Frequent Guest Program |

*Way of data processing: electronic*

*Automated decisions, profiling: n.a. in connection with the data processing*

*Data transfer: no*

*Data transfer to third countries or international organisations: no*

*Data processors:*

|  |  |  |
| --- | --- | --- |
| **Name** | **Seat** | **Task of the data processor** |
| *Creative Management Kft.* | *8200 Veszprém, Boksa tér. 1/A.* | *Operation of the newsletter sending system* |
| *NetHotelBooking Kft.* | *8200 Veszprém, Boksa tér. 1/A.* | *Storage of newsletter sending database* |
| *HOST WARE Kft.* | *1149 Budapest Róna utca 120* | *Delivering welcome e-mails to the guests and storage of the e-mail addresses* |

*Possible consequences of the non-delivery of data:* The data subject will not receive newsletters or information on other services.

**5.2. CONTACT VIA WWW.HOTELSOPRON.HU**

*Purpose of data processing:* Requesting an offer, making a booking or providing information

*Scope of data subjects:* Anyone inquiring about Hotel Sopron or its services

*Source of data processed:* data subject

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Name of the data subject | Recording, identification in case of booking | a) consent of the data subject | 3 years | * remains in Outlook |
| until revocation of the consent  of the data subject | * retained in messages sent via forms |
| E-mail address and phone number of the data subject | Maintaining contact, sending a reply | a) consent of the data subject |
| 3 years | * remains in Outlook |

*Way of data processing:* electronic

*Automated decisions, profiling:* n.a. in connection with the data processing

*Data transfer:* no

*Data transfer to third countries or international organisations:* no

*Data processors:*

|  |  |  |
| --- | --- | --- |
| **Name** | **Seat** | **Task of the data processor** |
| *Creative Management Kft.* | *8200 Veszprém, Boksa tér. 1/A.* | *Operation of the newsletter sending system* |

*Possible consequences of the non-delivery of data:* Failure to reply, the guest will not get an answer to his/her question.

**5.3. ADVANCE BOOKING**

*Purpose of data processing:* Provision of hotel services for future guests, booking accommodation.

*Scope of data subjects:* Anyone booking accommodation with Hotel Sopron

*Source of data processed:* Guest, intermediary websites, travel agencies, agencies ordering events, businesses and persons

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Name and address of the guest | requesting an offer | a) consent of the data subject | * 3 years in Outlook * 2 years in ResNWeb * 5 years in Hostware | * remains in Outlook * on the admin page of ResNWeb– int he Bookings menu * The booking and the group request for an offer are recorded in the hotel program called Hostware |
| recording a booking | b) performance of a contract |
| verifying invoiced items in case of cancellation to clarify disputed issues | d) enforcement of a legitimate interest: economic and claim enforcement interest |
| Phone number of the guest | maintaining contact |
| E-mail address of the guest | sending marketing e-mails | a) consent of the data subject | until revocation of consent |
| confirmation | b) performance of a contract | * 3 years in Outlook * 2 years in ResNWeb * 5 years in Hostware |
| verifying invoiced items in case of cancellation to clarify disputed issues | d) enforcement of a legitimate interest: economic and claim enforcement interest |
| Age of children | granting a discount |
| Address in case of group booking | Pre-recording of data to accelerate check-in and to facilitate the guests’ comfort | d) enforcement of a legitimate interest: economic and claim enforcement interest | * 3 years in Outlook * 5 years in Hostware | * The booking and the group request for an offer are recorded in the hotel program called Hostware |
| Card number in case of group booking |
| Date of birth in case of group booking |
| In the case of group bookings of nationals of third countries gender and nationality of the guest, visa or residence permit number  mother’s name  Hungarian border crossing point | Pre-recording of data to accelerate check-in and to facilitate the guests’ comfort | d) enforcement of a legitimate interest: economic and claim enforcement interest | * 3 years in Outlook | * The booking and the group request for an offer are recorded in the hotel program called Hostware |
| Bank card details or SZÉP card details | to grant discounts | b) performance of a contract  d) enforcement of a legitimate interest: economic and claim enforcement interest | * if received via e-mail then 3 years in Outlook * 5 days in ResNWeb | * used for payment * enforcing a penalty or a compensation after the guest has left. |
| to guarantee a booking in peak periods |

*Way of data processing:* electronic

*Automated decisions, profiling:* n.a. in connection with the data processing

*Data transfer:* no

*Data transfer to third countries or international organisations:* no

*Data processors:*

|  |  |  |
| --- | --- | --- |
| **Name** | **Seat** | **Task of the data processor** |
| *NetHoteBooking Kft.* | *8200 Veszprém, Boksa tér 1/a.* | *Operation, development and maintenance of the online system RESNWEB used for room booking and requesting an offer* |
| *HOST WARE Kft.* | *1149 Budapest Róna utca 120* | *Guest Book, recording bookings in this system* |

*Possible consequences of the non-delivery of data:* pre-booking is not recorded; the hotel cannot guarantee the room reservation

**5.4. ACCOMMODATION SERVICE**

*Purpose of data processing:* Ensuring the accommodation ordered by the guest

*Scope of data subjects:* Anyone who has booked accommodation with Hotel Sopron

*Source of data processed:* data subject, travel agency, party ordering event services

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Guest   * name * address | to be able to ensure the accommodation | b) performance of a contract | Respective year + 8 years | * To fill in the check-in form, * Recording in Hostware * Enforcement of tourist tax * Issue of invoice * In case of 3rd country nationals subject to notification pursuant to Act II of 2007 § 73 * Frequent Guest Program |
| to enforce tourist tax resp. exemption from tourist tax | c) compliance with a legal obligation : Decree 55/2011 (XII.29) of Sopron Municipality and Act C of 1990 § 31 | Respective year + 5 years |
| Making out the invoice | c) compliance with a legal obligation :  Accounting Act | Respective year + 8 years |
| In the case of a third country national, the accommodation has a notification obligation | c) compliance with a legal obligation : Act II of 2007 | 31st March of the following year |
| Ensuring the Frequent Guest Program | a) consent of the data subject | Until revocation of consent |
| Guest   * date and place of birth, * nationality * ID card number/ passport number | To ensure the accommodation service | b) performance of a contract | Respective year + 8 years | * To fill in the check-in form, * Recording in Hostware * Enforcement of tourist tax * In case of 3rd country nationals subject to notification pursuant to Act II of 2007 § 73 |
| To enforce tourist tax resp. exemption from tourist tax | c) compliance with a legal obligation : Decree 55/2011 (XII.29) of Sopron Municipality and Act C of 1990 § 31 | Respective year + 5 years |
| In the case of a third country national, the accommodation has a notification obligation | c) compliance with a legal obligation : Act II of 2007 | 31st March of the following year |
| e-mail address | Sending marketing materials | a) consent of the data subject | Until revocation of consent max. the respective year + 5 years | * To fill in the check-in form, * Recording in Hostware |
| phone number | Maintaining contact |
| Reason of tourist tax exemption | Enforcement of tourist tax exemption | c) compliance with a legal obligation : Decree 55/2011 (XII.29) of Sopron Municipality and Act C of 1990 § 31 | Respective year + 5 years | * Enforcement of tourist tax |
| In the case of group bookings of nationals of third countries gender and nationality of the guest, visa or residence permit number  mother’s name  Hungarian border crossing point | Fulfilling the notification obligation | c) compliance with a legal obligation : Act II of 2007 | 31st March of the following year | * To fill in the check-in form, * 3 In case of 3rd country nationals subject to notification pursuant to Act II of 2007 § 73 |

*Way of data processing:* electronic

*Automated decisions, profiling:* n.a. in connection with the data processing

*Data transfer:* Sopron mayor’s office, Regional Directorate of Western Transdanubia, Győr

*Data transfer to third countries or international organisations:* no

*Data processors:*

|  |  |  |
| --- | --- | --- |
| **Name** | **Seat** | **Task of the data processor** |
| *HOST WARE Kft.* | *1149 Budapest Róna utca 120* | *Guest Book, recording bookings in this system* |

*Possible consequences of the non-delivery of data:* Failure to provide the accommodation service.

**5.5. RESTAURANT, CATERING SERVICE**

*Purpose of data processing:* Providing table reservation service

*Scope of data subjects:* Anyone reserving a table in the restaurant of Hotel Sopron

*Source of data processed:* data subject

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Restaurant guest   * name, * phone number | identification, maintaining contact | a) consent of the data subject | * Until revocation of consent * until Sunday closing time of the booking week * in case of e-mail: 3 years in Outlook | * paper-based weekly print-outs |
| Restaurant guest   * e-mail address | providing information on other restaurant services | a) consent of the data subject | * Until revocation of consent * 3 years in Outlook | * If requested by the restaurant guest, then sent via Outlook |

*Way of data processing:* electronic, paper-based

*Automated decisions, profiling: n.a. in connection with the data processing*

*Data transfer: no*

*Data transfer to third countries or international organisations: no*

*Data processors: no*

*Possible consequences of the non-delivery of data: The hotel cannot ensure the table reservation.*

**5.6. MASSAGE, WELLNESS TREATMENTS**

*Purpose of data processing:* Providing massage and other wellness services to guests

*Scope of data subjects: Anyone ordering the above mentioned services*

*Source of data processed: data subject*

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Name of wellness guest | identification, maintaining contact, billing | a) consent of the data subject  c) compliance with a legal obligation : Accounting Act | Respective year + 8 years | * massage registration * written on the invoices |
| Address of wellness guest | billing | c) compliance with a legal obligation : Accounting Act | Respective year + 8 years | * on the invoice |
| Phone number of wellness guest | maintaining contact | a) consent of the data subject | Revocation of consent, but end of the following month at the latest | * massage registration |

*Way of data processing:* electronic, paper-based

*Automated decisions, profiling:* n.a. in connection with the data processing

*Data transfer: no*

*Data transfer to third countries or international organisations:* no

*Data processors:*

|  |  |  |
| --- | --- | --- |
| **Name** | **Seat** | **Task of the data processor** |
| *HOST WARE Kft.* | *1149 Budapest Róna utca 120* | *Guest Book, charging the wellness service to the guest’s room* |

*Possible consequences of the non-delivery of data:* The hotel cannot provide the massage or wellness service

**5.7. EVENT SERVICES, ROOM AND EQUIPMENT RENTAL**

*Purpose of data processing:* Provision of venue and equipment for events of the customer

*Scope of data subjects:* Anyone contacting Hotel Sopron for event organisation

*Source of data processed:* data subject, contract

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| In the case of private persons the   * address | Making out the invoice | c) legal obligation  (Accounting Act) | Respective year + 8 years | * Indicated in the contract * Recorded in Hostware event programme * Indicated on the invoice |
| Conclusion of the contract for the purpose of data processing | b) performance of a contract |
| In the case of private persons the   * name |
| Making out the invoice | c) legal obligation  (Accounting Act) |
| Performance of the contract concluded for the purpose of the data processing | b) performance of a contract | 5 years in Hostware | * Recorded in Hostware event programme * Indicated in the offer, * in the confirmation * in the event scenario |
| In the case of private persons the   * phone number * e-mail address |
| In the case of private entrepreneurs   * address * tax number | Making out the invoice | c) legal obligation  (Accounting Act) | Respective year + 8 years | * Indicated in the contract * Recorded in Hostware event programme * Indicated on the invoice |
| Conclusion of the contract for the purpose of data processing | b) performance of a contract |
| In the case of private entrepreneurs   * name |
| Making out the invoice | c) legal obligation  (Accounting Act) |
| Performance of the contract concluded for the purpose of the data processing | b) performance of a contract | 5 years in Hostware | * Recorded in Hostware event programme * Indicated in the offer, * in the confirmation * in the event scenario |
| In the case of private entrepreneurs   * phone number * e-mail address |
| Not for private entrepreneurs the name of the customer’s representative authorised to conclude a contract | Conclusion of the contract for the purpose of data processing | b) performance of a contract | Respective year + 8 years | * Indicated in the contract * Recorded in Hostware event programme |
| Making out the invoice | c) legal obligation  (Accounting Act) |
| Name  Phone number and  E-mail address of the partner’s contact person | Performance of the contract concluded for the purpose of the data processing | d) enforcement of a legitimate interest: economic interest, reconciliation of the tasks contained in the contract of engagement, speeding up administration | 3 years after last communication | Recorded   * in the contract * in Hostware event programme * in the offer, * in the confirmation * in the event scenario * Used for maintaining contact |

*Way of data processing: electronic, paper-based*

*Automated decisions, profiling: n.a. in connection with the data processing*

*Data transfer: no*

*Data transfer to third countries or international organisations: no*

*Data processors:*

|  |  |  |
| --- | --- | --- |
| **Name** | **Seat** | **Task of the data processor** |
| *HOST WARE Kft.* | *1149 Budapest Róna utca 120* | *recording of events and room reservations* |

*Possible consequences of the non-delivery of data:* The event will not take place.

**5.8. PARKING**

*Purpose of data processing:* Provision of parking service in the parking lot of Hotel Sopron

*Scope of data subjects:* Anyone using the hotel parking lot

*Source of data processed:* data subject

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Name of the person using the parking lot | identification maintaining contact  billing | a) consent of the data subject  c) compliance with a legal obligation: Accounting Act | Respective year + 8 years | * Recorded in Hostware master data, because the invoice is generated from here |
| Address of the person using the parking lot | invoicing |
| Phone number of the person using the parking lot | maintaining contact | a) consent of the data subject | Until revocation of consent, End of the day following the end of the parking | * Recorded in Hostware master data |

*Way of data processing:* electronic

*Automated decisions, profiling:* n.a. in connection with the data processing

*Data transfer: no*

*Data transfer to third countries or international organisations:* no

*Data processors:*

|  |  |  |
| --- | --- | --- |
| **Name** | **Seat** | **Task of the data processor** |
| *HOST WARE Kft.* | *1149 Budapest Róna utca 120* | *Guest Book, charging parking fee to the room or generating a service invoice about external use of the parking lot* |

*Possible consequences of the non-delivery of data: The hotel cannot ensure the parking service.*

**5.9. BILLING, ORDER AND CONFIRMATION**

*Purpose of data processing:* Ensure the billing obligation under the Accounting Act

*Scope of data subjects:* suppliers of the hotel

*Source of data processed:* data subject, contract

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| For private entrepreneurs or primary producers   * name * address * tax number * bank account number | Contract conclusion;  Receipt and processing of the invoice | b) performance of a contract  c) legal obligation: (Accounting Act) | Respective year + 8 years | * Recorded in SAP * Indicated on the invoice |
| Not for private entrepreneurs the name of the person authorised to sign on behalf of the customer | Contract conclusion | b) performance of a contract | Annex to the invoice, therefore the respective year + 8 years | * Indicated in the contract * Recorded in SAP |
| Partner’s contact person   * name; * phone number * e-mail address | Performance of the contract | d) enforcement of a legitimate interest: economic interest, reconciliation of the tasks contained in the contract of engagement, speeding up administration | 3 years after last communication | * Indicated in the contract * Recorded in SAP * Used for keeping contact |

*Way of data processing:* electronic, paper-based

*Automated decisions, profiling:* n.a. in connection with the data processing

*Data transfer: no*

*Data transfer to third countries or international organisations:* no

*Data processors:*

|  |  |  |
| --- | --- | --- |
| **Name** | **Seat** | **Task of the data processor** |
| *SAP Hungary Kft.*  *SAP Ag.* | [*1031 Budapest, Záhony u. 7, Graphisoft Park*](https://www.google.hu/maps/place/1031+Budapest+Z%C3%A1hony+u.+7%2C+Graphisoft+Park)  *Neurottstrasse 16, 69190 Walldorf, Germany* | *Recording of invoices* |

*Possible consequences of the non-delivery of data:* The contract is not concluded and the hotel cannot ensure the order.

**5.10. COUPONS, TRIPS SOLD TOGETHER WITH ACCOMMODATION, ADMISSION TICKETS (Familypark, summer bob, adventure park, theatre, museums, train ride, ferry trips etc.)**

*Purpose of data processing:* Provision of additional programmes for the hotel guests

*Scope of data subjects:* Anyone who has booked accommodation at Hotel Sopron

*Source of data processed:* data subject

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Name of the guest using the service | identification | a) consent of the data subject  c) legal obligation: (Accounting Act) | 8 years because they are used for service confirmation as annex to the supplier’s invoice | * indicated on the coupon * Registration of issued coupons |
| To prove the validity of the coupon |

*Way of data processing:* electronic, paper-based

*Automated decisions, profiling:* n.a. in connection with the data processing

*Data transfer: no*

*Data transfer to third countries or international organisations:* no

*Data processors:* no

*Possible consequences of the non-delivery of data:* The hotel cannot ensure the programme offered.

**5.11. GIFT COUPONS**

*Purpose of data processing: Offering the option of buying gift coupons and delivering it to the guest.*

*Scope of data subjects:* Anyone contacting Hotel Sopron with the aim to buy a gift coupon

*Source of data processed:* data subject

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Name  e-mail address | Provision of the gift coupon purchased and proving it has been used up | a) consent of the data subject,  d) enforcement of a legitimate interest: Economic interest: Proof of use | * until revocation of consent * until the validity of the coupon * until the accounting closure of the year of use * 3 years in Outlook | * sent via e-mail * Customer’s name is recorded in the gift coupon registration |

*Way of data processing:* electronic

*Automated decisions, profiling:* n.a. in connection with the data processing

*Data transfer: no*

*Data transfer to third countries or international organisations:* no

*Data processors:* no

*Possible consequences of the non-delivery of data:* The hotel cannot ensure the gift coupon.

**5.12. FREQUENT GUEST PROGRAM**

*Purpose of data processing:* Identification of returning guests, providing them special offers and discounts

*Scope of data subjects:* Regular guests of Hotel Sopron

*Source of data processed:* data subject

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Card no. of frequent guest | identification | a) consent of the data subject | * until the regular guest withdraws from the program, i.e. until revocation of consent | * in Hostware |
| * Name * Date of birth   of the guest participating in the FGP | * recorded in Hostware * indicated on application form |
| Address of the guest participating in the FGP | identification  Postal delivery of frequent guest card | * recorded in Hostware * indicated on application form |
| Phone number of the guest participating in the FGP | Maintaining contact | * recorded in Hostware * indicated on application form |
| E-mail address of the guest participating in the FGP | Maintaining contact Information on special offers exclusively intended for our regular guests | a) consent of the data subject | * until the regular guest withdraws from the program, i.e. until revocation of consent * 3 years in Outlook | * recorded in Hostware * indicated on application form * recorded in Newsletter database |
| Serial number of Kékfrankos booklet | Identification of Kékfrankos regular guest | * Until revocation of consent maximum till 20th December 2018 | * Generated in Hostware * Indicated on Kékfrankos booklet |
| Name of Kékfrankos regular guest |

*Way of data processing:* electronic and paper-based

*Automated decisions, profiling:* n.a. in connection with the data processing

*Data transfer: no*

*Data transfer to third countries or international organisations:* no

*Data processors:*

|  |  |  |
| --- | --- | --- |
| **Name** | **Seat** | **Task of the data processor** |
| *HOST WARE Kft.* | *1149 Budapest Róna utca 120* | *Registration of guests’ data* |

*Possible consequences of the non-delivery of data:* The hotel cannot ensure the frequent guest discount for the guest.

**5.13. LOST & FOUND**

*Purpose of data processing:* handling lost items found in Hotel Sopron

*Scope of data subjects:* Anyone who has stayed at Hotel Sopron

*Source of data processed:* data subject

*Scope of data processed: (by defining the purpose, the legal grounds and the duration of data processing):*

| Data category | Purpose of data processing | Legal grounds of data processing | Duration of data processing | What do we use it for? |
| --- | --- | --- | --- | --- |
| Name and contacts of the finder | * recording lost items, * notification of the owner and of the finder * identification | c) legal obligation  (Civil Code §§ 5:59 – 5:62) | * 1 year from the time the item was recovered | * recorded in the records of lost items * recorded in minutes of sale or destruction according to the law |
| Location of the lost item |
| Time when the item was found |
| Name of lost item |
| Description of the lost item | * recording lost items, * notification of the owner and of the finder   identification | c) legal obligation  (Civil Code §§ 5:59 – 5:62) | 1 year from the time the item was recovered | * recorded in the records of lost items * recorded in minutes of sale or destruction according to the law |
| If there is a name on the lost item, this name |
| Documents found | 8 days from the time the item was recovered | * recorded in the records of lost items * transmitted to the notary |

*Way of data processing:* electronic, paper-based

*Automated decisions, profiling:* n.a. in connection with the data processing

*Data transfer: no*

*Data transfer to third countries or international organisations:* no

*Data processors:* no

*Possible consequences of the non-delivery of data:* The lost item cannot be returned to its owner.

**6. WEBSITE DATA PROCESSING**

**6.1. SERVER LOGGINGS OF WWW.HOTELSOPRON.HU**

When visiting [www.hotelsopron.hu](http://www.hotelsopron.hu), the activities of the user, i.e. your activity as the case may be, is automatically logged by the web server. The website has a google analytics code too, which also logs the user activities automatically and creates a package statistics thereof, hence, if so, of your activities. For this reason, it is not possible to accurately retrace the user in google analytics.

Our company does not associate data generated during the analysis of log files with other information, and does not seek to identify the user, i.e. you.

*Purpose of data processing:* checking the functionality of the services during the site visit, preventing abuses, performing web analytics, and optimizing paid advertising.

*Legal grounds of data processing:* d) enforcement of a legitimate interest: our company has a legitimate interest in the secure operation of the website.

*Type of personal data processed:* IP address, date, time, address of the previous, the current and the following web page visited.

Duration of data processing: for websites 150 days, for Google analytics 50 months.

*Data processors:*

|  |  |  |
| --- | --- | --- |
| **Name** | **Seat** | **Task of the data processor** |
| *Creative Management Kft.* | *8200 Veszprém, Boksa tér. 1/A.* | *WEB site operation* |
| *NetHoteBooking Kft.* | *8200 Veszprém, Boksa tér 1/a.* | *Operation, development and maintenance of the online system RESNWEB used for room booking and requesting offers* |

*Data processing of external service providers in connection with logging*:

The portal html code also contains references to and from external servers that are independent of our company. The server of the external service provider is connected directly to the user’s computer, that is, to your computer. Please note that the providers of these links are able to collect user data (e.g. IP address, browser, operating system details, cursor movement, address of the page visited, and date of visit) when their server is communicating directly with your browser.

The address of the pages you visited, as well as the date and time of the visit alone are not sufficient to identify you; however, if linked to other data (perhaps those entered during registration) they might be used for drawing conclusions about the user.

*Other information*:

The IP address is a series of numbers allowing a clear identification of the computers and mobile devices of Internet users, i.e. also you. With the IP address, even the geographic location of the computer user, i.e. also you can be ascertained.

**6.2. WWW.HOTELSOPRON.HU USE OF COOKIES**

Our site uses cookies. For a tailor-made service, the service provider places a small data package called a cookie on the computer of the user and reads it when re-visiting the page. If the browser returns a previously saved cookie, the cookie operator can link the user's current visit with the previous visits, but only for his own contents.

*Purpose of data processing:* user identification, user distinction, identifying the user's current session, storing session data, preventing loss of data, web analytics for personalized services and the efficiency and success of future website development, as well as the optimization of paid ads.

*Legal grounds of data processing:* consent of the data subject.

*Scope of data processed:* ID, date, time and the previous page visited.

*Duration of data processing: 90 days*

The user can delete cookies from his computer or disable them in his browser. Cookies are usually managed in the Tools / Settings menu of the browser under Privacy / History / Advanced.

*Possible consequences of the non-delivery of data:* restricted use of the website services, inaccuracy of analytical measurements.

**7. ESTABLISHMENT OF CONTACT – WRITTEN COMMUNICATION WITH CUSTOMERS OF HOTEL SOPRON**

If you would like to contact us, you can contact the data controller on the contact details provided in this document or on the website.  
Hotel Sopron will delete all received e-mails with the sender's name, e-mail address, date, time and other personal details as stated in the message at the latest 3 years after the date of communication.

**8. OTHER DATA PROCESSING**

Information on data processing not listed in this document is provided when the data is received.  
We inform our clients that the court, the prosecutor's office, the investigative authority, the offense authority, the administrative authority, the National Authority for Data Protection and Freedom of Information as well as other bodies authorized by relevant legislation may contact us as data controller for the provision of information, the communication and transfer of data and the handover of documents.

Hotel Sopron will disclose the personal data – provided the authority had indicated its exact purpose and scope – only to the quantity and extent that it is indispensable for the purpose of the request.

**9. STORAGE OF PERSONAL DATA, SECURITY OF DATA PROCESSING**

Hotel Sopron's computing systems and other data retention centres can be found at its headquarters, other business locations and with its data processors.

Hotel Sopron selects and operates the information technology used to handle personal data in the provision of the service so that the data processed:

a) can be accessed by the authorized persons (availability);

b) the authenticity and authentication of the data processed is ensured (authenticity of data handling);

c) that the unchanged status of the data can be verified (data integrity);

*d)* is protected against unauthorized access (confidentiality of data).

Hotel Sopron protects the data by appropriate measures, in particular against unauthorized access, alteration, transfer, disclosure, deletion or destruction, as well as accidental destruction, damage and unavailability due to the change of technique used.

Hotel Sopron provides a technical solution to protect electronically managed data files in its various registers, ensuring that stored data - unless permitted by law - be directly linked and assigned to the data subject.

During data processing, Hotel Sopron ensures

*a)* confidentiality: it protects the information so that it can only be accessed by those who are entitled to it;

b) integrity: protects the accuracy and completeness of the information and the processing method;

c) availability: ensures that when the eligible user needs the information, he/she can actually access the information required and has access to the relevant tools.

The data controller ensures the security of personal data, stores them with due care and in safety and keeps them safe from unauthorized access. Furthermore, he takes all technical and IT measures permitted by the latest technology, and establishes appropriate institutional, organizational and procedural rules, which are required to ensure the security of data processing and which provide a level of protection appropriate for the risks of data processing.

The IT systems and network of Hotel Sopron and its partners are protected against computer-aided fraud, espionage, sabotage, vandalism, fire and flood, further against computer viruses, hacking and attacks leading to service denial. The operator provides security through server-level and application-level security procedures.

**10. CONTACT DETAILS OF THE DATA CONTROLLER**

Name: Győr-Sopron-Ebenfurti Vasút Zártkörűen Működő Részvénytársaság (in English: Győr-Sopron-Ebenfurti Railways Private Company Limited by Shares), Hotel Sopron

Seat: H-9400 Sopron, Mátyás király u. 19

Company registration number: 08-10-001787

Court of registration: Tribunal of Győr as Court of Registration

Tax number: 10008676-2-08

Name of Data Protection Officer: Mr. Tibor Árvai

Phone: +3699577305

E-mail: [tarvai@gysev.hu](mailto:tarvai@gysev.hu)

**11. RIGHTS OF DATA SUBJECTS, LEGAL REMEDIES**

The data subject, i.e. you may request the rectification of your personal data and – with the exception of mandatory data processing – the deletion, “forgetting”, revocation, restriction of such data. Furthermore, you have the right of data portability and protest.

At your request, we will provide you with written information about the data we process about you, the purpose, legal grounds, duration of data processing, our data processing activity, as well as who and for what purpose has received your data. You may exercise your right of data portability and request us to disclose your personal information you had provided to us so that you may transfer this data to another data controller.

You may, at any time, submit your requests regarding the processing of your personal data via the above mentioned contact details in writing or in the manner indicated at the time of the data collection.

If you notice an infringement of your data, you have the right to go to court and/or authority.

*Right of access of the data subject:*

As the data subject you have the right to receive feedback from the data controller about whether your personal data is being processed. If such data is processed, you have the right to access your personal data and receive information about the following:

* the purposes of data processing;
* the categories of the personal data affected;
* the addressees with whom personal data has been or will be shared, including in particular third-country addressees and international organizations;
* the planned duration of personal data storage;
* your right to have data rectified and deleted, to restrict the data processing and to protest;
* your right to lodge a complaint with the supervisory body;
* data sources;
* whether automated decision-making or profiling occurs and if so, what logic is used, how important such data processing is and what kind of consequences it has on you.

If personal data is transmitted to third countries or to international organisations, you have the right to receive information about the guarantees pertaining to the transmission.

At your request, unless otherwise provided by a law, we will provide you with a copy of the data we process about you. For additional copies we charge a reasonable fee based on administrative costs. Information is provided by Hotel Sopron in electronic form.

Information is provided by the data controller within a maximum of one month from the submission of the request.

*Right of rectification:*

You have the right to request the correction of inaccurate personal data processed by Hotel Sopron and to obtain completion of incomplete personal data.

*Right to delete data and data „to be forgotten”:*

In either of the following circumstances you are entitled to request Hotel Sopron to delete your personal data without undue delay:

* your personal data is no longer needed for the purpose for which it had been collected;
* as the data subject you revoke your consent and the data processing has no other legal grounds;
* you object to the data processing and and there is no priority legitimate right for data processing. Priority rights for your person – if any – are set out in section 5;
* we processed your personal data unlawfully;
* we have to delete your personal data in order to be able to fulfil a legal obligation imposed on us as data controller by EU or national law;

If the data controller has disclosed your personal data and is required to cancel it under the previous paragraph, he must take all reasonable steps taking into account the available technology and the costs of implementation, including technical measures, to inform other data controllers who are processing such data that the data subject has requested to erase any links to, or copies or replications of that personal data.

The deletion of data and the “making of data forgotten” may not be initiated, if the data processing is needed:

* to ensure the freedom of expression and to exercise the right to information;
* to fulfil the legal obligation imposed on us as data controllers by EU or national law to process personal data
* for public interest or for the purpose of performing a task prescribed for us as data controller by public law;
* in cases involving public health,
* for archival, scientific and historical research purposes;
* for statistical purposes;
* to satisfy a public interest or
* to present, enforce or protect legal claims.

Thus, you may not request the deletion of your data from our records until, and for which:

* the Act C of 2000 on Accounting imposes the obligation of data processing and data retention;

*Right to restrict data processing:*

Restriction of data processing is nothing more than the suspension of data processing (see section 3).

At the request of the data subject, Hotel Sopron will restrict the data processing, if one of the following conditions is met:

* You dispute the accuracy of your personal data. In this case, the restriction refers to the time period that allows the accuracy of personal data to be verified;
* Data processing is illegal, but you are opposed to deleting your data and ask for their use to be restricted;
* You have protested against data processing. In this case, the restriction applies to the time period until it is determined that the legitimate reasons of Hotel Sopron take precedence over your legitimate reasons.

If data processing is restricted, personal data may only be processed – with the exception of data storage –

* with your consent as data subject;
* to present, enforce or protect legal claims;
* to protect the rights of another natural or legal person or
* in the public interest of the Union or of a Member State.

Hotel Sopron will inform you in advance of lifting the restriction on data processing.

*Right of data portability:*

You are entitled, unless otherwise provided by a law, to receive in electronic format the personal data you had provided to us and to transfer this data to another data controller.

*Right to protest:*

You are entitled to protest at any time against

* the processing of your personal data owing to public interest or for the purpose of performing a task prescribed for us as data controller by public law;
* the processing of your personal data necessary to enforce the legitimate interest of the data controller or a third person, including also profiling.

In the case of protest, we are not allowed to further process your personal data unless it is based on legislation that takes precedence over your interests and rights. Priority rights applicable to you, if any, are given in section 5.

If your personal data is processed for direct marketing purposes, you are entitled to protest at any time against the processing of your personal data for this purpose, including profiling. In the event of a protest against the processing of personal data for direct marketing purposes, the data may not be processed for this purpose.

*Automated individual decisions including profiling:*

Hotel Sopron does not use automated decision-making and profiling methods during its activity.

*Right of revocation:*

As the data subject you are entitled to revoke your consent at any time. Revoking of consent only prohibits data processing occurring after the revocation of consent to data processing, unless it is based on legislation that takes precedence over your interests and rights. Priority rights applicable to you, if any, are given in section 5.

*Procedural rules:*

Hotel Sopron will inform you about measures taken without undue delay, no later than within one month of receipt of the request. If necessary, - taking into account the complexity and number of the requests - this deadline may be extended by another two months. Hotel Sopron will inform you about the extension of the deadline by indicating the reasons for the delay within one month of receiving the request. Unless otherwise requested, the information will be provided electronically.

If Hotel Sopron does not take action concerning your request without delay, but no later than one month after the receipt of the request, it shall inform you of the reasons for the lack of action and of your right to lodge a complaint with a supervisory authority and to exercise your right to seek judicial remedy.

Hotel Sopron provides the requested information free of charge. If your request is clearly unfounded, recurring or excessive, the data controller – having regard to the administrative costs associated with providing the requested information – may charge a reasonable fee or deny action based on the request.

In the information provided to you, Hotel Sopron may only make reference to a legal obligation, legal authorization, legal restriction or any legal consequence by specifying the article and the paragraph of the referenced legal act and citing the paragraph in question.

Hotel Sopron will inform all recipients of any data rectification, deletion or the restriction of data processing, to whom the personal data had been transmitted, unless this proves impossible or requires disproportionate effort. At your request, you will be informed about these recipients, too.

Information is provided primarily in electronic format, unless otherwise requested by you.

*Compensation and damages for tort:*

Any person who has suffered material or non-material damage as a result of the breach of the Data Protection Regulation may claim damages from the data controller or the data processor. The data processor shall only be liable for damage caused by data processing if he or she fails to comply with the statutory obligations specifically imposed on data processors or if he or she disregarded or contradicted to the data controller's legitimate instructions.

Each data controller or data processor has a joint responsibility for the total damage.

The data controller or the data processor shall be exempt from liability if he can prove that he or she is not responsible for the event giving rise to the damage.

*Right to apply to the courts:*

You as the data subject may refer to the court of your residence or place of stay in the case of the infringement of your rights (<https://birosag.hu/>).

The court will give priority to the case.

*Administrative procedure on data protection:*

Complaints can be lodged with the Hungarian National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

Seat: H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Pf.: 5.

Phone: 06.1.391.1400

Fax: 06.1.391.1410

E-mail: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>