



PRIVACY POLICY

1. General Provisions

The Betekints Vendéglátóipari és Szolgáltató Kft. (8200 Veszprém, Veszprémvölgyi u. 4.), the operator of Betekints Spa and Conference Hotel **** always ensures the legality and expediency of the data handling for the personal data it manages. The purpose of this policy is that our guests who provide their personal data, before the reservation, receive adequate information about our company's terms and conditions and guarantees for how long it is being handled. For the purposes of this information, our company is responsible for all personal data handling issues; we consider it mandatory for ourselves.

However, we reserve the right to change the terms of this unilateral legal statement, in which case we will inform the persons concerned in advance. If you have questions about the contents of this guide, please email us at betekints@betekints.hu or by mail at the Betekints Spa and Conference Hotel **** (8200 Veszprém, Veszprémvölgyi street 4). The data management of our company's activities is based on a voluntary contribution, or in some cases data management is required to take action at the request of the person concerned prior to the conclusion of the contract.

Our data management complies with applicable laws, in particular:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Regulation (EC) No 95/46 (General Data Protection Regulation, hereinafter referred to as "**GDPR**")
- Act CXII of 2011 on Information Freedom of Information Act. ("**Info. law**").

Contact details of the data controller:

Name: Betekints Vendéglátóipari és Szolgáltató Kft. (Hereinafter referred to as "Data Manager, Data Controller")

Headquarters and postal address: 8200 Veszprém, Veszprémvölgyi street 4.

Business Registration Number: 19-09-504964

Tax number: 11856355-2-19

E-mail: betekints@betekints.hu

Telephone: +36 (88) 579 280

Fax: +36 (88) 579 289

Website: www.betekints.hu

Represented by: Márkus László

We provide the following information regarding our data management:

2. The circle of stakeholders

Any person identified directly or indirectly, identifiable by any personal data person affected by this data is treated by the Data Manager. Therefore, the stakeholders are primarily the guests, the natural person's partner, the representatives, contacts, or other employees of the non-natural person.

3. The scope of the personal data handled, the purpose, legal basis and duration of the data handling

3.1. Data management related to online booking

Our company offers an online booking facility to book a room / package in a fast, convenient and cost-free way.

Personal Data Manager: Data Manager

The purpose of data management: is to make booking easier, more cost-effective and more efficient.

Legal basis for data handling: on the basis of the consent of the person concerned - GDPR Article 6 (1) (a).

Personal Data Handled: Addressing; surname and first name; address (country, postal code, city, street, house number); telephone number; e-mail address; company name and registered office, bank card number, SZÉP card data (identification, card name).

Data management duration: two years after the last day of the reservation date.

Utilization of the data processor: our company uses information technology service provider for the online accommodation system as follows.

Personal data processor	Headquarter	Description of the data processor job
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A	The RESnWEB system ensures the possibility of online reservation

By accepting this Privacy Policy, the express consent of the data subject is that Data Processor will use additional data processors to make the service more convenient and customized as follows:

The name of the other data processor	Headquarter	Description of the data processor job
The Rocket Science Group, LLC	675 Ponce de Leon Ave NE Suite 5000, Atlanta, GA 30308, USA	Owned by the Mandrill software integrated into the booking system. This software is responsible for sending emails and notifications to receive automatic emails for booking, bidding, and satisfaction measurement
Triptease Limited	WeWork 3 Waterhouse Square 138-142 Holborn London EC1N 2SW United Kingdom	An online chat feature that allows guests to stay in touch with the hotel, can handle your bookings quickly and efficiently
BIG FISH Internet-technológiai Kft.	1066 Budapest, Nyugati tér 1-2	Providing data communications for payment transactions between the trader and the payment service provider system, ensuring traceability of transactions for merchant partners
OTP Mobil Kft.	1093 Budapest, Közraktár u. 30-32.	Provision of data communications for payment transactions between the trader and the payment service provider system, customer service assistance to users, transaction verification and fraud-monitoring for the protection of users.
Barion Payment Zrt.	1117 Budapest, Infopark sétány 1. I. épület	Provision of data communications for payment transactions between the trader and the payment service provider system, customer service assistance to users, transaction verification and fraud-monitoring for the protection of users.
Creative Management Kft.	8200 Veszprém, Boksa tér 1. A ép.	Serving server hosting tasks

Possible consequences of failure to provide data: no contract for the hotel room.

3.2. Room request-related data management

Our company offers an opportunity to electronically request for rooms/offers for our guests. The offer is provided by our automated system, subject to free capacities.

Personal Data Manager: Data Manager

The purpose of the data management: is to find out the prices of the hotel rooms / offers

Legal basis for data processing: on the basis of the consent of the person concerned, GDPR Article 6 (1) (a) and data handling prior to the conclusion of the contract to take action at the request of the person concerned - GDPR Article 6 (1) (b).

Personal Data Handled: Addressing; surname and first name; telephone number; e-mail address; number of guests.

Data management duration: two years after the last day of the reservation date.

Utilization of a data processor: our company uses information technology service provider to operate the online request system as follows.

Personal data processor	Headquarter	Description of the data processor job
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A	Operation of the online request module

By accepting this Privacy Policy, the express consent of the data subject is that Data Processor will use additional data processors to make the service more convenient and customized as follows:

The name of the other data processor	Headquarter	Description of the data processor job
The Rocket Science Group, LLC	675 Ponce de Leon Ave NE Suite 5000, Atlanta, GA 30308, USA	Owned by the Mandrill software integrated into the booking system. This software is responsible for sending emails and notifications to receive automatic emails for booking, bidding, and satisfaction measurement
Creative Management Kft.	8200 Veszprém, Boksa tér 1. A ép.	Serving server hosting tasks

Possible consequences of not delivering data: The hotel cannot make an offer.

3.3. Data management for subscribing to a newsletter

Our company keeps in touch with guests who are interested in its services, news about its operations, promotions.

Personal Data Manager: Data Manager

The purpose of data management: is to keep in contact with potential guests

Legal basis for data handling: on the basis of the consent of the person concerned - GDPR Article 6 (1) (a).

Indication of a legitimate interest: maintaining and developing business relationships with partners and guests

The personal data handled is: name, e-mail address

Duration of data management: Our company handles e-mail addresses until the newsletter is unsubscribed.

Utilization of the data processor: our company uses information technology service provider for the online accommodation system as follows.

Personal data processor	Headquarter	Description of the data processor job
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A	Store of the newsletter database

By accepting this Privacy Policy, the express consent of the data subject is that Data Processor will use additional data processors to make the service more convenient and customized as follows:

The name of the other data processor	Headquarter	Description of the data processor job
Creative Management Kft.	8200 Veszprém, Boksa tér 1/A	Operating of the newsletter system

Possible consequences of failure to provide data: The person concerned does not receive a newsletter from our company.

You can always unsubscribe from our newsletter by email to betekints@betekints.hu or by clicking the unsubscribe icon in the newsletter. In this case, your email address will be deleted from our database immediately.

3.4. Personal data management related to satisfaction measurement

As a hotel we aim to provide our guests with high quality services, so we constantly ask for feedback from our guests about their experiences during their stay at our hotel.

Personal Data Manager: Data Manager

The purpose of data management: is to request feedback from guests to further develop and improve our services.

The legal basis for data handling: is the legitimate interest of the hotel operator GDPR Article 6 (1) (f).

Indication of a legitimate interest: our company has a legitimate interest in getting feedback on the development of our services based on feedback.

The personal data handled is: name, sex, e-mail address.

Data management duration: two years after the last day of the reservation date.

Utilization of the data processor: our company uses information technology service provider for the online accommodation system as follows.

Personal data processor	Headquarter	Description of the data processor job
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A	Operating the Satisfaction Module

By accepting this Privacy Policy, the express consent of the data subject is that Data Processor will use additional data processors to make the service more convenient and customized as follows:

The name of the other data processor	Headquarter	Description of the data processor job
The Rocket Science Group, LLC	675 Ponce de Leon Ave NE Suite 5000, Atlanta, GA 30308, USA	Owned by the Mandrill software integrated into the booking system. This software is responsible for sending emails and notifications to receive automatic emails for booking, bidding, and satisfaction measurement

Possible consequences of failure to provide data: The concerned party does not receive a questionnaire on satisfaction from our company.

3.5. Cookies

In order to provide customized service, the Data Manager has a small data packet, place a cookie on your computer and read it later. If your browser returns a previously saved cookie, the cookie operator can link the user's current visit with the past, but only for their own content.

The purpose of data management: is to identify, track, distinguish between users, identify users' current session, save data, prevent data loss, web analytical measurements, and personalized service.

Legal basis for data handling: on the basis of the consent of the person concerned - GDPR Article 6 (1) (a).

The scope of the data being processed: identification number, date, time, and previously visited page.

Data management duration: is up to 90 days.

Using a Data Processor: Our company uses the assistance of an IT service provider for cookie handling as follows.

Personal data processor	Headquarter	Description of the data processor job
Creative Management Kft.	8200 Veszprém, Boksa tér 1/A	Website operation

More information about data management: The cookie can be deleted from your computer or disabled in your browser. To manage cookies, you can usually use the Privacy / History / Custom Settings menu in cookies, cookies, cookies or tracing in the Tools / Preferences menu of browsers.

Possible consequences of non-disclosure: the impossibility of using the service in accordance with paragraphs 2 to 5 above.

3.6. Web server logging

When visiting nethotelbooking.net, the web server automatically logs user activity.

The purpose of data management: During a visit to the site, the service provider checks the functionality of the services and records the visitor data to prevent abuse.

The legal basis for data processing: is Article 6 (1) (f) of the GDPR. Our company has a legitimate interest in the safe operation of the website.

Type of personal data you are handling: ID number, date, time, address of the page you are visiting.

Data management duration: is up to 90 days.

Using a data processor: Our company uses IT service provider to operate the website as follows.

Personal data processor	Headquarter	Description of the data processor job
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A	Record visitors and record information for server operation

More information about data management: our company does not link data collected during the analysis of logs with other information and does not seek to identify the user. The addresses of the pages visited, as well as the date and time data are not suitable for identifying the person concerned, but are linked to other data (such as those provided during registration) to help draw conclusions about the user.

External Service Provider Data Logging: The portal html code contains links to external servers outside of our company and links to external servers. The external service provider is connected directly to the user's computer. We are reminding our visitors that the providers of these links are able to collect user data (eg IP address, browser, operating system details, cursor movement, visited page title, and time of visit) due to direct communication with the user's browser due to direct communication with the user's browser. The IP address is a series of numbers that can be clearly identified by the computers and mobile devices of users on the Internet.

IP addresses can also geographically locate a visitor using that computer. The addresses of the pages visited, as well as the date and time data are not suitable for identifying the person concerned, but are linked to other data (such as those provided during registration) to help draw conclusions about the user.

3.7. Request for information / continuous contact

The Data Controller ensures that the person concerned can be constantly or regularly contacted in different ways and forums. For example, electronic communication; e-mail exchanges, contact by post or telephone, etc.

Personal Data Manager: Data Manager

The purpose of data management: is to provide the person with the appropriate information and keep in touch.

Legal basis for data handling: on the basis of the consent of the person concerned - GDPR Article 6 (1) (a). In the case when the Data Controller and the relevant agreement conclude with one another for example the use of a Data Manager service such as accommodation, the legal basis for data handling may also be based on the contract. Contacting and maintaining contact information, such as the management of relevant data, may be based on the legitimate interest of the third party or the data controller, as well as other legally defined legal grounds, such as mandatory by law.

The personal data handled: surname and first name; telephone number; e-mail address; question content.

The duration of the data management: until the goal is reached, or if the performance of the interest or the third party or the data subject's interest or obligation requires it, after the goal has been reached, until the interest has ceased or if the obligation is fulfilled. If, on the basis of data manipulation or otherwise, the law determines the duration of the data management, the Data Controller manages the data for the specified period of time.

3.8. Check-in and check-in form / Guest and Tourism Register

The guest at the time of arrival filled a check-in form in which he / she agrees to ensure that the Data Controller fulfils the obligations specified in the relevant legislation (in particular in the field of foreign policing and domestic tourism tax law) and proof of fulfilment, and for the purpose of identifying the person concerned, until the competent authority can check compliance with the obligations set out in the relevant legislation.

Personal Data Manager: Data Manager

The purpose of the data management: is to ensure the full compliance with the legislation (in particular the foreign policing and tourism tax), the establishment of the service contract, the possible enforcement of the claim and the contact with the person concerned.

Based on the authorization given by Act C of 1990 on Local Taxes, based on the local authority's regulation on the establishment of a tourist tax, data management is compulsory for the name, place of birth and time, address and citizenship, thus the legal conditions for the use of the services provided by the Data Controller .

The Data Handler draws the attention of the stakeholders that, in view of the 2011 CXII. , in accordance with the provisions of Section 6 (5) of the Act, the data voluntarily provided by the data subject to the tax obligations (in particular the tourist tax) and to enforce his / her legitimate interests without further consent of the person concerned, you can manage.

For the purposes of guarding, storing and destroying paper-based sign-up sheets and other paper-based data files, the Data Controller shall act in accordance with these Rules and the Rules of Procedures.

Legal Basis for Data Processing: Check-in, filling the check-in form is based on a voluntary contribution but subject to the use of the services and the data specified by Act C of 1990 on Local Taxes - if voluntarily provided by them - data management is mandatory.

The personal data handled: surname and first name; time and place of birth; home address; telephone number; e-mail address; ID number; car registration number; nationality; payment method; arrival and departure date. In the case of a tourism tax exemption, the following information can be transmitted to the local tax office: first name and surname; time and place of birth; arrival and departure date. The e-mail address is not required on the check-in form. On the check-in form, by entering the e-mail address, the person concerned voluntarily subscribes to a Data Manager-operated newsletter service. The relevant information is provided on the check-in form.

The duration of the data processing: in the case of mandatory data, 5 years from the date of registration, in the case of a newsletter, at the request of the person concerned, until the cancellation of the rights and obligations deriving from the legal relationship with other data, the data handler treats personal data, are documented and the certificate supports the accounting records, the duration of the data processing is based on Section 169 (2) of Act C of 2000, for at least 8 years.

Possible consequences of non-disclosure: no contract is concluded for the hotel room or no tourism tax relief can be established.

3.9. Camera system

In the hotel, surveillance cameras are operated for the personal and financial security of the affected persons and for other purposes. They are called by the notice board for the attention of those concerned.

Personal Data Manager: Data Manager

The purpose of the data management: is to protect the property owned by the data controller, to prevent and prove the violation of the law.

The legal basis for data handling: is the legitimate interest of the data controller. The data controller has a legitimate interest in safeguarding the property he owns, preventing or proving infringements at his headquarters.

Data managed: the image of the people who are captured on the scenes and other personal information recorded by the observation system. Data is provided automatically, by entering the property.

Duration of data handling: 3 working days without use.

Further information on data handling: Location of the recording: 8200 Veszprém, Veszprémvölgyi str. office located under number 4. Recordings are stored with enhanced data security measures, ensuring that unauthorized persons cannot view and copy recordings. Only the data manager's designated employee is entitled to record the current image of the cameras on a recording medium.

Location of observation cameras and their viewing angle:

Camera number	The location of the cameras	Area to which the camera's angle of view is directed
2.	restaurant	restaurant interior from entrance to bar
4.	wellness building on the NE frontage	part of the entrance gate and the 2-2 parking spaces next to it
5.	wellness section ground floor, swimming pool	swimming pool
6.	wellness building on the NE frontage	parking zone next to the restaurant

7.	wellness center ground floor, entrance corridor	wellness center entrance
8.	wellness section ground floor, swimming pool	children's pool and jacuzzi
9.	wellness center basement	saunas
14.	wellness building on the SE frontage	wellness outdoor terrace and parking spaces behind it

Utilization of a Data Processor: Our company uses the assistance of a service partner for maintenance work and technical assistance during camera system operation as follows.

Personal data processor	Headquarter	Description of the data processor job
Lantech Kft.	8200 Veszprém, Szeglethy József u. 7.	Providing technical tasks to operate the camera system.

3.10. Data management in connection with gift vouchers

The Data Manager allows you to purchase various gift vouchers / coupons involved, which can be used in the given value for our services.

Personal Data Manager: Data Manager

The purpose of data management: is to provide you with the relevant information, receive a unique offer of a gift certificate, order and / or accept a gift certificate, and maintain contact information.

Legal basis for data handling: on the basis of the consent of the person concerned - GDPR Article 6 (1) (a).

Scope of managed data: addressing; surname and first name; delivery address (country, postal code, city, street, house number); telephone number; e-mail address; the name of the company, the value of the voucher, the method of payment, the surname and the first name of the beneficiary of the gift voucher, or the indication that the gift voucher may be used by the owner (anonymous beneficiary)

The length of the data processing: the term of the data is maintained until the expiration of the enforceability of the rights and obligations deriving from the legal relationship in which the data controller handles the personal data in connection with the legality of the data that is evidenced and the document supports the accounting records. on the basis of Article 169 (2) of the Act, for at least eight years.

3.11. Guestbook

The guests at the Betekints Spa and Conference Hotel **** reception can write a comment in the guestbook, while providing their datas.

Personal Data Manager: Data Manager

The purpose of data management: is to give the person concerned the opportunity to express his opinion on the services of the Data Manager in order to improve the quality of the hotel services and to keep in touch with the data owner for any guest complaints.

Legal basis for data handling: on the basis of the consent of the person concerned - GDPR Article 6 (1) (a).

Data managed: data provided by the data subject, typically: name, address, e-mail address, comment / opinion.

Duration of data handling: at the concerned request, the identification can be terminated by anonymization.

Further information on the data handling: The person concerned acknowledges that the guestbook may be accessed by other persons and third parties, and by using the guestbook, you explicitly agree to know the details of the guestbook as well as third parties. Since Data Manager does not examine the information provided in the guestbook, but makes the guestbook available, therefore Data Management is not responsible for the use of the guestbook. Accordingly, the guestbook must be used with caution.

3.12. Guest Survey

Our guests can write a review, opinion, comment on the paper-based guest survey at the reception or in the rooms, as well as online.

Personal Data Manager: Data Manager

The purpose of data management: is to give the person concerned the opportunity to express his opinion on the services of the Data Manager in order to improve the quality of the data management services and to keep in touch with the data owner for any guest complaints.

Legal basis for data handling: on the basis of the consent of the person concerned - GDPR Article 6 (1) (a).

The range of data processed: surname and first name, address, e-mail address, comment / opinion

Data management duration: until the end of year 5 from the date of data collection Data manager clears the processed data.

Using a Data Processor: Our company uses the help of an IT service provider to use the online guest questionnaire as follows.

Personal data processor	Headquarter	Description of the data processor job
NetHotelBooking Kft.	8200 Veszprém, Boksa tér 1/A	Operation of a guest questionnaire module

3.13. Make an appointment

The Data Manager allows the data subjects to make an appointment, during which they can personally contact the Data Controller about its services and other issues.

Personal Data Manager: Data Manager

The purpose of the data management: providing time and keeping in touch.

Legal basis for data handling: on the basis of the consent of the person concerned - GDPR Article 6 (1) (a).

The range of data processed: surname, first name and phone number, e-mail address, date

Duration of data management: until the goal is achieved.

3.14. Data management related to the conclusion of an agreement

The data handler entrusts the provision of certain services to a prior agreement as a condition.

Personal Data Manager: Data Manager

The purpose of the data management: is to identify the person concerned and to provide the service to the person concerned in accordance with the provisions of the agreement.

The legal basis for data processing: is data management required to perform a contract in which the party concerned is required to take action by one party or before the conclusion of the contract at the request of the party concerned - GDPR Article 6 (1) (b).

The scope of the data to be processed: the names, content, remuneration, rights and obligations to be included in the scope of the contract for the purposes of concluding the agreement, telephone number, e-mail address, address,

The length of the data processing: the term of the data is maintained until the expiration of the enforceability of the rights and obligations deriving from the legal relationship in which the data controller handles the personal data in connection with the legality of the data that is evidenced and the document supports the accounting records, on the basis of Article 169 (2) of the Act, for at least eight years.

3.15. Banking data management

The Data Controller allows you to equalize the value of the products / services by bank transfer, or provide a bankcard guarantee by providing bankcard information as a guarantee for the services you wish to use.

Personal Data Manager: Data Manager

The purpose of the data management: is to facilitate and control the financial performance of the party concerned.

The legal basis for data processing: is the transfer of the bank through the bank and thus the communication of the related data to the Data Controller based on the contribution of the person concerned - Article 6 (1) (a) GDPR.

The number of accounted data is: account holder's name, account holder's bank account number, transfer notification, amount of transfer, credit card details (bank card number, name on card, validity date)

The duration of the data processing: for the identification and contact data, until the expiration of the enforceability of the rights and obligations deriving from the legal relationship in which the data controller handles the personal data in relation to the legal relationship with the data that is evidenced

and the document supports the accounting account, Pursuant to Article 169 (2) of Act C of 2000, at least eight years. In the case of bankcard data, until the completion of the contractual performance, until payment of the services provided.

Further information on data management: In order to safeguard banking and business secrecy, the Data Controller will do its utmost to ensure that the above information is only available to the Employee who is strictly required to perform his or her duties and has the right to do so. As a bankcard guarantee, we accept and manage bankcard data only through online interfaces that have an appropriate security protocol.

The activity and process involved in data management is as follows:

- a) Affected by bank transfer on the channel that he / she chooses and available to him or by providing bank card details a bank card guarantee for the services he / she wants to use.
- b) Affected by the bank transfer or by providing the details of the bankcard data to the data manager.
- c) The data controller checks the details of the name, amount and communication in case of bank transfers. In the case of a bankcard guarantee, the data provided will only be treated if the card is debited in case of violation of the cancellation conditions contained in the respective GTC, or the settlement of the contractual service and the services used are made on the basis of the given card data.
- d) You may transfer the details of bank transfer or credit card payment to a data processor entrusted with data management, accounting and accounting tasks.

Using a Data Processor: Our company uses outsourcing services for accounting and other accounting tasks as follows.

Personal data processor	Headquarter	Description of the data processor job
Mérleg 1999 Kft.	8429 Porva, Pápai út 1.	Performing bookkeeping and accounting tasks.

3.16. Event-related data management

Our hotel organizes many events and actively participates in the events. We also handle personal information in the organization and retention of events.

Personal Data Manager: Data Manager

The purpose of personal data management: is to forward event information, and in some cases to document the organization of the event, on the basis of the consent of the person concerned - GDPR Article 6 (1) (a).

The scope of the managed data is: name, delegate business organization, a portrait of the persons present at the event and other personal data recorded by the photograph or video. To handle these data, it is necessary to properly identify the registrants, and on the other hand, if necessary, the event can be documented in a pictorial manner.

Duration of data handling: 5 years from the date of data collection.

Further information on data management: By registering with the event, the data subject explicitly agrees to manage personal data as described in this booklet, and if necessary, make an image and video recording that can be used by Data Manager without restriction and restriction within the retention period, for information purposes.

Possible consequences of failure to provide data: Data providing is voluntary and, in case of non-consent, the data subject can not register for the event.

3.17. Other data management

Data management not listed in this policy is provided when data is included. We inform our customers that some authorities, public organisations, courts can contact our company for the purpose of communicating personal information. For these organisations, if the organisation concerned indicates the exact purpose and scope of the data, it publishes personal data only to and to the extent that it is indispensable for the purpose of the request and if the fulfilment of the request is required by law.

4. How to store personal data, security of data management

Our computing systems and other data retention locations are located at the headquarters and on the servers rented by the data processor. Our company selects and manages the IT tools used to manage personal data in the provision of the service so that the data treated:

- (a) accessible to the authorized person (availability);

- (b) authenticity and authentication (credibility of data management);
- (c) its unambiguousness can be verified (data integrity);
- (d) be protected against unauthorized access (confidentiality of data).

We pay particular attention to the security of the data, we also take the technical and organizational measures and develop the procedural rules necessary to enforce the GDPR guarantees. The data are protected by appropriate measures, particularly against unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as unavailability due to accidental destruction, damage, and the technique used.

The IT system and network of our company and partners are protected against computer-aided fraud, computer viruses, computer burglaries, and attacks leading to service denial. The operator also provides security through server-level and application-level security procedures. Daily data backup is solved. In order to avoid any privacy incident, our company will take every possible action, in the event of such an incident - according to our incident management policy - to minimize risks and to remedy the damage.

5. Rights of the persons concerned, remedies

You may request the information concerned to handle your personal data and may request the rectification of your personal data or, with the exception of mandatory data, cancellation, revocation, discretion and right of protest as indicated in the record and the above mentioned contact details of the data controller.

At the request of the person concerned, we provide the information in electronic form without delay, but no later than 30 days, in accordance with our applicable regulations. Requests for those below to comply with the rights below are provided free of charge.

5.1. Right to information:

Our company will take appropriate measures to ensure that all the information on the treatment of personal data referred to in Article 13 and 14 of the GDPR and the information provided for in Articles 15-22. and Article 34 in a concise, transparent, comprehensible and easily accessible form, in a clear and straightforward manner, but in a precise manner.

The right to information can be exercised in writing through the contact details given in point 1. At the request of the person concerned, information may be given orally, after verifying his or her identity. We inform our customers that if our company's employees are in doubt about the identity of the person concerned, we may request the information required to confirm that person's identity.

5.2. Right to access:

The person concerned has the right to be informed by the data controller about whether his personal data is being processed. If you are in the process of handling personal data, you have the right to have access to your personal information and the information listed below.

- The aims of data management;
- the categories of personal data involved;
- the categories of recipients or recipients with whom or which personal data will be communicated or communicated, including in particular third country (non-EU) recipients or international organizations;
- the intended duration of personal data storage;
- Limitation of rectification, deletion or limitation of data and right of protest;
- the right to file a complaint addressed to the supervisory authority;
- Data sources information; the fact of automated decision making, including profiling, as well as the logic used and the understandable information on the significance of such data management and the likely consequences for the data subject.

In addition to transferring personal data to a third country or to an international organization, the data subject may be entitled to receive information on the appropriate guarantees for the transmission.

5.3. Correction right:

Under this law, anyone may request rectification of inaccurate personal data processed by our company and the completion of incomplete data.

5.4. Right to rescind:

The person concerned has the right, on any of the following grounds, to delete his personal data without undue delay:

- (a) personal data are no longer required for the purpose from which they have been collected or otherwise treated;
- (b) the party concerned withdraws the consent of the data controller and does not have any other legal basis for data processing;
- (c) the data subject is objecting to the processing of data and has no prior legitimate reason for data handling;
- (d) the unlawful handling of personal data may be established;
- (e) the personal data are to be deleted in order to comply with the legal obligation imposed on the data controller in the Union or Member States' law;
- (f) the collection of personal data in connection with the provision of information society services.

Deletion of data can not be initiated if data management is required for the following purposes:

- (a) to exercise the right to freedom of expression and information;
- (b) the fulfilment of an obligation under the law of the Union or of the Member States applicable to the data controller for the processing of personal data, or for the performance of a task carried out in the exercise of public authority exercised in the public interest or on the data controller;
- (c) for public health or archaeological, scientific and historical research purposes or for statistical purposes in the public interest;
- (d) or for the submission, validation or protection of legal claims.

5.5. Right to Restrict Data Management:

At the request of the person concerned, we restrict the processing of data to the conditions in Article 18 of the GDPR, so if:

- (a) the person concerned disputes the accuracy of the personal data; in this case, the restriction concerns the period of time which allows the accuracy of the personal data to be verified;
- (b) data processing is unlawful and the data subject is opposed to the deletion of the data and instead requests a restriction on its use
- (c) the data controller no longer needs personal data for data processing, but the data subject requires them to submit, enforce or protect legal claims; or
- (d) the person concerned objected to the data handling; in this case, the restriction applies to the duration of determining whether the data controller's legitimate reasons prevail over the legitimate grounds of the party concerned.

If data processing is restricted, personal data may be handled only with the consent of the person concerned or with the submission, validation or protection of legal claims or other rights of a natural or legal person, or in the public interest of the European Union or of a Member State, except for storage. The concerned party must be informed in advance of the discontinuance of the limitation of data handling.

5.6. Right to data storage:

The data subject shall have the right to receive the personal data that he or she has accessed to the data controller in a fragmented, widely used machine-readable format and transmit such data to another data controller. Our company can execute such request in word or excel format.

5.7. The right to protest:

If your personal data is handled for direct business, the person is entitled to object at any time to the handling of personal data relating to that purpose, including profiling, if it is related to direct business acquisition. In the event of a protest against the handling of personal data for direct business acquisition, the data can not be handled for this purpose.

5.8. Automated decision-making in individual cases, including profiling:

The data subject shall be entitled to exclude the scope of a decision based solely on automated data management, including profiling, which would have a bearing on him or would have a significant effect on him. The above entitlement does not apply if it is data management

- (a) it is necessary for the conclusion and performance of the contract between the data subject and the data controller;
- (b) the law of the Union or of the Member States applicable to the data controller which enables the rights and freedoms and the legitimate interests of the data subject
- (c) establish appropriate measures to protect it; or
- (d) is based on the express consent of the person concerned.

5.9. Right of withdrawal:

The person concerned has the right to withdraw his consent at any time. Revocation of the contribution does not affect the lawfulness of the consent based on consent, prior to the withdrawal.

5.10. Procedural rules:

The data controller shall inform the party concerned without undue delay, but in any way within one month from the receipt of the request, on the request for an Article. If necessary, taking into account the complexity of the application and the number of applications, this deadline may be extended by two additional months. The controller shall inform the person concerned of the extension of the time limit by indicating the reasons for the delay within one month of the receipt of the application.

If the concerned electronic application has been filed, the information will be provided electronically, unless otherwise requested by the person concerned.

If the data controller fails to take action on the request of the person concerned, he informs the data subject without delay and no later than one month from the receipt of the request for reasons of non-action and whether he or she may file a complaint with the supervisory authority and exercise his right of judicial redress.

The data controller informs all recipients of any rectification, deletion or data limitation that he or she has been communicating with him or her, unless this proves impossible or requires disproportionate effort. At the request of the data subject, the data controller shall inform the addressees thereof.

5.11. Compensation and grievance fees:

Any person who has suffered material or non-material damage as a result of a violation of the Data Protection Regulation is entitled to compensation for the damage sustained by the data controller or the data processor. The data processor shall only be held liable for damage caused by data processing if he or she has not complied with the statutory obligations specifically imposed on the data processor or if the data controller's legitimate instructions have been disregarded or contravened. If several data controllers or multiple data processors or both the data controller and the data processor are involved in the same data management and are responsible for the damage caused by the data handling, each data controller or data processor is jointly and severally liable for the total damage.

The data controller or the data processor shall be exempt from liability if he or she proves that he or she is not liable in any way for the event giving rise to the damage.

5.12. Right to Court and Data Protection Authority Procedure:

In case of breach of his or her rights, the data subject may turn to the court. The court proceeds out of court.

Complaint with the National Data Protection and Information Authority can be used:

National Data Protection and Information Authority

Address of the authority: 1125 Budapest, Szilágyi Erzsébet fasor 22 / C.

Postal address: 1530 Budapest, Pf. : 5.

Phone: +36 (1) 391 1400

E-mail ugyfelszolgalat@naih.hu

Web: www.naih.hu

You have the right to complain to a supervisory authority established in a Member State of the European Union where you are habitually resident, working or suspected of a breach.

In violation of the rights of minor offending, hateful, exculpatory content, rectification, the rights of a deceased person, breach of good repute:

National Media and Communications Authority

1015 Budapest, Ostrom u. 23-25.

Mail address: 1525. Pf. 75

Tel: +36 (1) 457 7100

Fax: +36 (1) 356 5520

E-mail: info@nmhh.hu

6. Other information

The data manager declares that

- It reserves the right to change the Prospectus as a result of the adjustment of the legal background to be amended in the meantime, in accordance with the Regulations and other Internal Rules.

Veszprém, 2018. május 25.

Márkus László

CEO

Betekints Vendéglátóipari és Szolgáltató Kft.