

PRIVACY NOTICE

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1. The Data Controller

STAG Hotels Hungary Szállodaipari Korlátolt Felelősségű Társaság

registered seat: 1087 Budapest, Baross tér 7-8.

represented by: Tibor László Polgár, hotel director

e-mail: gdpr.budapest@intercityhotel.com

web: <https://hrewards.com/hu/intercityhotel-budapest>

(hereinafter: the “Data Controller”)

The list of the cooperating data processor and data controller companies (recipients) is contained in Annex 2.

2. Independent data processing activities

2.1. Room reservation

You may book a room on the website, in the application, possibly through an accommodation booking site, by telephone, or in person at the hotel. When the room reservation is recorded, we process the personal data as set out below. The source of the data is the data subject him/herself, the person making the reservation, or the intermediary service provider arranging the reservation (e.g. accommodation booking sites, travel agency). The Data Controller has no access to the card data required for the payment.

Data	Purpose of the processing	Retention period	Legal basis of the processing	Rights
Data required for the reservation <i>salutation, full name, e-mail address, personal data arising in a special request, fact giving entitlement to a discount</i>	Recording the reservation and the related communication	Until cancellation or departure	Processing carried out for the purpose of the performance of the contract . Without providing the data, the reservation is not possible. [GDPR Article 6(1)(b)]	4.2. 4.3. 4.4. 4.5. 4.6.
Personal data possibly appearing on the invoice: <i>name, address</i>	Compliance with a statutory obligation	For 8 years following the current year	Compliance with a legal obligation. Following the invoicing, retention is necessary on account of the tax and accounting rules ¹ . Without providing the data, the reservation is not possible. [GDPR Article 6(1)(c)]	4.2. 4.3. 4.5.
Pre-stay: <i>e-mail address</i>	notification prior to the reservation	Until dispatch	Our legitimate interest in the development of the service and in sales. You may object to the processing at any time at any of the contact details indicated in point 1. [GDPR Article 6(1)(f)] This processing is joint data processing in accordance with the provisions of point 3.	4.2. 4.3. 4.5. 4.7.

¹Pursuant to Section 169(2) of Act C of 2000 on Accounting, “Accounting vouchers directly and indirectly supporting the accounting records (including general ledger accounts and analytical or itemised records) shall be retained in a legible form for at least 8 years, in a manner that is retrievable by reference to the accounting entries.”

If you initiate the reservation from the hrewards.com website, the personal data you provide there are processed by **H Rewards Pte Ltd.**² (11 Penang Lane; 238485, Singapore; Telephone: +65 6771 1121; e-mail: dpo@hworld.com), the operator of the website, which transfers the reservation data to us. H Rewards A Pte. Ltd. also operates the H Rewards loyalty programme. Privacy notice: <https://hrewards.com/hu/legal/privacy>.

The data required for the payment are processed by the integrated platform of the payment service providers in accordance with the provisions of point 8 of this privacy notice.

You may obtain information on reservations made through the application by way of the information notice placed in the application.

The service providers arranging accommodation reservations are data controllers independent of us. Please inform yourself about their data processing practices on their websites before making a reservation.

2.2. Check-in

On arrival you are required to complete a registration form; some of the data required for it have already been provided by you at the time of the reservation or at the pre-check-in, and they are therefore entered on your registration form. Please always check that the data are correct. The Data Controller has no access to the card data required for the payment.

Data	Purpose of the processing	Retention period	Legal basis of the processing	Rights
Data required for the check-in <i>full name, e-mail address, billing address, personal data arising in a special request, loyalty programme number, vehicle registration number, room number, reservation number, date of arrival and departure</i>	Performance of the accommodation service	Until departure	Processing carried out for the purpose of the performance of the contract . Without providing the data, the check-in is not possible. [GDPR Article 6(1)(b)]	4.2. 4.3. 4.4. 4.5. 4.6.
	Enforcement of claims, complaint handling, compliance with accounting obligations	For 8 years following the current year	Our legitimate interest in the enforcement of claims and in complaint handling within the limitation period and the accounting retention period. You may object to the processing at any time at any of the contact details indicated in point 1. [GDPR Article 6(1)(f)]	4.2. 4.3. 4.5. 4.7.
	Compliance with a statutory obligation	Until the end of the following year	Compliance with a legal obligation. Retention is necessary on account of the provisions of the Hungarian tourism act ⁴ . Without providing the data, the check-in is not possible. [GDPR Article 6(1)(c)] The data stored in the central storage facility may be accessed by Magyar Turisztikai Ügynökség Zrt., the local municipality, the state tax authority, the KSH, the police and the operator.	4.2. 4.3. 4.5.

²H World A Holdings Singapore Pte. Ltd. is the parent company of Steigenberger Hotels GmbH and of Hotels GmbH. Steigenberger Hotels GmbH is the parent company of STAG Hotels Hungary Szállodaipari Korlátolt Felelősségű Társaság.

⁴Section 9/H of Act CLVI of 2016 on the State Tasks Relating to the Development of Tourism Areas prescribes the scope of the data to be transmitted and the retention period.

Data	Purpose of the processing	Retention period	Legal basis of the processing	Rights
Data required for the transmission to the central storage facility³: <i>name, birth name, mother's birth name, gender, document number, date and place of birth, citizenship, data of the identity document, number of the visa or residence permit, place and time of entry into the country, time of arrival and departure</i>	Enforcement of claims, complaint handling, accounting	On the registration form – in paper form – the data are retained for 8 years following the current year.	The retention of the registration form is our legitimate interest in the enforcement of claims and in complaint handling within the limitation period and the accounting retention period. You may object to the processing at any time at any of the contact details indicated in point 1. [GDPR Article 6(1)(f)]	4.2. 4.3. 4.5. 4.7.
Personal data possibly appearing on the invoice: <i>name, address</i>	Compliance with a statutory obligation	For 8 years following the current year	Compliance with a legal obligation. Following the invoicing, retention is necessary on account of the tax and accounting rules ⁵ . Without providing the data, payment by a natural person is not possible. [GDPR Article 6(1)(c)]	4.2. 4.3. 4.5.

In respect of **children under 14 years of age**, we record the data prescribed by law on the basis of the declaration of their representative, with the proviso that in such a case the identity document need not be presented and we do not record the identification data of the document.

In the case of a member performing **personal protection service duties** who is in a professional service relationship with the counter-terrorism body defined in the Act on the Police, the identification and document data prescribed by law need not be recorded in order to protect the personnel. The service card certifying the membership of the professional staff and the service entitlements must be presented to the accommodation service provider; however, the document identification data of the service card need not be recorded.

With regard to the **loyalty programme**, H Rewards Pte Ltd.⁶ (11 Penang Lane; 238485, Singapore; Telephone: +65 6771 1121; e-mail: dpo@hworld.com) is the data controller; we only receive notification of the loyalty status in order to apply the discount. Privacy notice: <https://hrewards.com/hu/legal/privacy>.

2.3. Voucher

In the case of the purchase of a voucher, the processing takes place as set out below. The source of the data is the person purchasing the gift card.

³Data not contained in the identity document need not be recorded.

⁵Pursuant to Section 169(2) of Act C of 2000 on Accounting, "Accounting vouchers directly and indirectly supporting the accounting records (including general ledger accounts and analytical or itemised records) shall be retained in a legible form for at least 8 years, in a manner that is retrievable by reference to the accounting entries."

⁶H World A Holdings Singapore Pte. Ltd. is the parent company of Steigenberger Hotels GmbH and of Hotels GmbH.

Data	Purpose of the processing	Retention period	Legal basis of the processing	Rights
In the case of a personalised voucher <i>the name of the holder of the voucher</i>	Ensuring the purchase and the redemption of the personalised voucher	Until redemption	Our legitimate interest in the performance of the contract. You may object to the processing at any time at any of the contact details indicated in point 1. [GDPR Article 6(1)(f)]	4.2. 4.3. 4.5. 4.7.
	Compliance with a statutory obligation	For 8 years following the current year	Following the redemption of the voucher, compliance with a legal obligation . After the redemption, retention is necessary on account of the tax and accounting rules ⁷ . Without providing the data, the purchase of a personalised voucher is not possible. [GDPR Article 6(1)(c)]	4.2. 4.3. 4.5.
Personal data possibly appearing on the invoice: <i>name, address</i>	Compliance with a statutory obligation	For 8 years following the current year	Compliance with a legal obligation . Following the invoicing, retention is necessary on account of the tax and accounting rules ⁸ . Without providing the data, the purchase of a voucher by a natural person is not possible. [GDPR Article 6(1)(c)]	4.2. 4.3. 4.5.

2.4. Complaint handling and the customers' book (complaints book)

If you do not agree with the handling of a complaint made orally, or if the immediate investigation of the complaint is not possible, we are obliged to take minutes of the complaint and of the positions relating to it.

In the case of a complaint submitted in writing, the taking of minutes is not necessary, but we must retain the reply.

You may also record your complaint in the customers' book (complaints book). After the entry has been made, we must remove the page containing the complaint or the suggestion and retain it separately, so that other guests cannot see the previous entries or the data of the persons making them.

Data	Purpose of the processing	Retention period	Legal basis of the processing	Rights
Minutes taken of a consumer complaint and the reply given to a written complaint <i>name, address, e-mail, signature, identification number</i>	Compliance with a statutory obligation	3 years	Compliance with a legal obligation . Retention is necessary on account of the consumer protection legislation ⁹ . The provision of the data is a condition of the recording of the complaint in the minutes. [GDPR Article 6(1)(c)]	4.2. 4.3. 4.5.

⁷Pursuant to Section 169(2) of Act C of 2000 on Accounting, "Accounting vouchers directly and indirectly supporting the accounting records (including general ledger accounts and analytical or itemised records) shall be retained in a legible form for at least 8 years, in a manner that is retrievable by reference to the accounting entries."

⁸Pursuant to Section 169(2) of Act C of 2000 on Accounting, "Accounting vouchers directly and indirectly supporting the accounting records (including general ledger accounts and analytical or itemised records) shall be retained in a legible form for at least 8 years, in a manner that is retrievable by reference to the accounting entries."

⁹Pursuant to Section 17/A(7) of Act CLV of 1997 on Consumer Protection, "The undertaking shall retain the minutes taken of the complaint and a copy of the reply for three years and shall present them to the supervisory authorities upon request."

Data	Purpose of the processing	Retention period	Legal basis of the processing	Rights
Customers' book (complaints book) <i>data provided</i>	Compliance with a statutory obligation	3 years	Compliance with a legal obligation. Retention is necessary on account of the consumer protection legislation ¹⁰ . The provision of the data is a condition of giving a reply. [GDPR Article 6(1)(c)]	4.2. 4.3. 4.5.

2.5. Contact

If you contact us electronically or by post, we handle your enquiry as set out below.

Data	Purpose of the processing	Retention period	Legal basis of the processing	Rights
Personal data provided in enquiries: <i>name, e-mail address, other personal data provided</i>	Answering enquiries and handling complaints	For 8 years following the current year	Consent , which you give by sending the enquiry. The consent may be withdrawn at any time at any of the contact details indicated in point 1. The withdrawal does not affect the lawfulness of the processing carried out prior to it. [GDPR Article 6(1)(a)]	4.1. 4.2. 4.3. 4.4. 4.5. 4.6.

2.6. Business relationship

If we are in a business relationship with the company or organisation represented by you or employing you, and we have received your contact details for the purpose of keeping in touch, we process your personal data as set out below. The source of the data is the data subject or the person acting on behalf of the company.

Data	Purpose of the processing	Retention period	Legal basis of the processing	Rights
Contact details of the contact persons of companies: <i>name, job title, e-mail address, telephone number</i>	Maintaining business contact	For as long as the business relationship subsists or until the contact person changes	Our legitimate interest in the performance of the contract and in keeping in touch. You may object to the processing at any time at any of the contact details indicated in point 1. [GDPR Article 6(1)(f)]	4.2. 4.3. 4.5. 4.7.

¹⁰Pursuant to Section 25(5) of Government Decree No. 210/2009 (IX. 29.) on the Conditions of Pursuing Commercial Activities, "The authorities entitled to supervise commercial activity may examine the entries made in the customers' book, as well as the duplicate copy of the reply given to a written customer complaint, going back three years."

Data	Purpose of the processing	Retention period	Legal basis of the processing	Rights
Data of the signatory or contact person appearing in the contract: <i>name, job title, e-mail address, telephone number, signature</i>	Compliance with a statutory obligation	For 8 years following the termination	Compliance with a legal obligation. We must retain the contract as an accounting voucher on account of the tax and accounting rules ¹¹ . Without providing the data, they cannot be indicated in the contract. [GDPR Article 6(1)(c)]	4.2. 4.3. 4.5.

2.7. Social media pages

You may follow us on the social media pages in order to be informed of the news concerning us.

Data	Purpose of the processing	Retention period	Legal basis of the processing	Rights
Data provided on the social media pages: <i>profile data</i>	Providing information on current news	Until you stop following us (until unsubscribing)	Consent , which you give by following us. The consent may be withdrawn at any time by unsubscribing. The withdrawal does not affect the lawfulness of the processing carried out prior to it. [GDPR Article 6(1)(a)]	4.1. 4.2. 4.3. 4.4. 4.5. 4.6.

The companies operating the social media pages are separate data controllers:

- **Facebook and Instagram, Meta Platforms** Ireland Limited (Hanover Quay, 5-7 Hanover Quay, Dublin), Ireland; <https://www.facebook.com/privacy/explanation>; <https://www.facebook.com/help/instagram/155833707900388/>)
- **LinkedIn**, LinkedIn Ireland Unlimited Company (registered seat: Wilton Place, Dublin 2, Ireland; <https://www.linkedin.com/legal/privacy-policy>)
- **Tripadvisor**, Tripadvisor Ireland Limited (registered seat: 70 Sir John Rogerson's Quay, Dublin 2, Ireland; <https://tripadvisor.mediaroom.com/HU-privacy-policy>)

3. Relevant data processing activities of the other members of the group of companies

3.1. pre-stay e-mail and corporate newsletter

The pre-stay e-mail and the corporate newsletter for our existing guests are compiled and sent by **Steigenberger Hotels GmbH** (registered seat: Lyoner Straße 25, 60528 Frankfurt am Main). Steigenberger Hotels GmbH has access to the guest database and operates its IT system for the member hotels. Liability is governed by the provisions of Article 82 of the GDPR.

¹¹Pursuant to Section 169(2) of Act C of 2000 on Accounting, "Accounting vouchers directly and indirectly supporting the accounting records (including general ledger accounts and analytical or itemised records) shall be retained in a legible form for at least 8 years, in a manner that is retrievable by reference to the accounting entries."

3.2. The loyalty programme

With regard to the loyalty programme, **H Rewards Pte Ltd.**¹² (11 Penang Lane; 238485, Singapore; Telephone: +65 6771 1121; e-mail: dpo@hworld.com) is the data controller; we only receive notification of the loyalty status in order to apply the discount. Privacy notice: <https://hrewards.com/hu/legal/privacy>.

3.3. The website

If you view the hrewards.com website or initiate the reservation from that website, your personal data are processed by **H Rewards Pte Ltd.** (registered seat: 11 Penang Lane; 238485, Singapore), the operator of the website, which transfers the reservation data to us. Privacy notice: <https://hrewards.com/hu/legal/privacy>.

3.4. Use of the WiFi

Steigenberger Hotels GmbH (registered seat: Lyoner Straße 25, 60528 Frankfurt am Main) operates the WLAN / WiFi system and stores the following data in its central WLAN / WiFi system.

- The MAC address of the device;
- The IP address with which you register for the service;
- The start / end of the use of the service;
- The duration of the use;
- The volume of data used;
- The name of the entry / access point;
- The identification data of the browser used;
- The language / time zone of the browser.

You may obtain further information when connecting to the WiFi.

4. Your rights

In connection with the data processing, you are entitled to the rights detailed in points 4.1.–4.7. If you wish to exercise any of them, please write to us at one of the contact details indicated in point 1.

Identification

Before fulfilling your request, we must in all cases verify your identity. If we are unable to identify you, we unfortunately cannot fulfil your request.

Answering the request

¹²H World A Holdings Singapore Pte. Ltd. is the parent company of Steigenberger Hotels GmbH and of Hotels GmbH.

Following the identification, we provide information in connection with the request in writing, electronically, or – at your request – orally. Please note that if you submitted the request electronically, we will reply electronically. Naturally, in this case you also have the possibility to request another method.

Deadline for handling the request

We will inform you of the measures taken as a result of your request at the latest within 1 (One) month of the receipt of the request. Where necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by a further 2 (Two) months, of which we will inform you within the 1 (One) month deadline for handling the request.

We are also obliged to inform you of the failure to take action within the one-month deadline for handling the request. You may lodge a complaint against this with the NAIH (point 5.1.), and you may exercise your right to a judicial remedy (point 5.2.).

The fee for handling the request

The requested information and measures are free of charge. An exception is the case where the request is manifestly unfounded or – in particular due to its repetitive character – excessive. In such a case we may charge a fee or refuse to fulfil the request.

4.1. You may withdraw your consent

In the case of data processing carried out on the basis of your consent, you may withdraw your consent at any time. In such a case we will erase your personal data relating to the given data processing without delay. Please note that the withdrawal does not affect the lawfulness of the processing carried out on the basis of the consent prior to the withdrawal.

4.2. You may request information (access)

You may request information as to whether your personal data are being processed, and if so:

- What is its purpose?
- Exactly which data are being processed?
- To whom do we transfer these data?
- For how long do we store these data?
- What rights and remedies do you have in this respect?
- From whom did we receive your data?
- Do we take automated decisions concerning you using your personal data? In such cases you may also request information on the logic (method) applied, and on the significance of such processing and its expected consequences.
- If you have found that we have transferred your data to an international organisation or to a third country (a non-EU Member State), you may request to be shown what guarantees the appropriate processing of your personal data.
- You may request a copy of the personal data processed (For further copies we may charge a fee based on administrative costs.)

4.3. You may request rectification

You may request that we correct or complete any of your personal data recorded inaccurately or incompletely.

4.4. You may request the erasure ("forgetting") of your personal data

You may request that we erase your personal data if:

- The personal data are no longer necessary for the purpose for which we processed them;
- In the case of data processing carried out on the basis of your consent;
- If it is established that we process the personal data unlawfully;
- If your objection is successful;
- If it is prescribed by EU or national legislation;
- The data were collected in the context of the offer of information society services to children.

We **may not erase** the personal data if they are necessary:

- for the purpose of exercising the right to freedom of expression and information;
- for the performance of an obligation under EU or Member State law applicable to the Data Controller which prescribes the processing of the personal data, or in the public interest;
- on the basis of a public interest in the area of public health;
- for archiving purposes in the public interest, for scientific and historical research purposes or for statistical purposes, where the erasure would be likely to render impossible or seriously impair this processing; or
- for the establishment, exercise or defence of legal claims.

4.5. You may request that we restrict the processing

You may request that we restrict the processing if any of the following applies:

- You contest the accuracy of the personal data, in which case the restriction applies to the period which enables us to verify the accuracy of the personal data;
- The processing is unlawful, but you oppose the erasure of the data and instead request the restriction of their use;
- We no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims;
- You have objected to the processing; in this case the restriction applies to the period until it is established whether the legitimate grounds of the Data Controller override your legitimate grounds.

In the case of restriction, the personal data may, with the exception of storage, only be processed with your consent, or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State. We will inform you in advance of any lifting of the restriction.

4.6. You may request that we hand over your personal data (right to data portability)

You are entitled to receive the personal data processed by us in a machine-readable format, and you are furthermore entitled to transmit these data to another data controller – or to have them transmitted at your request – provided that the processing is based solely on your consent or on a contract concluded with you or in your interest and is carried out by automated means.

The said right is not applicable where the processing is necessary for the performance of a task carried out in the public interest. It may not prejudice the right to erasure and may not adversely affect the rights and freedoms of others.

4.7. You may object to the processing of your personal data

You may object to the processing of your personal data where the processing is based on a legitimate interest, is for direct marketing purposes (e.g. sending a newsletter), or is necessary for the performance of a task carried out in the public interest. In this case we will erase the personal data, unless their processing is justified by compelling legitimate grounds which override your interests, rights and freedoms, or which relate to the establishment, exercise or defence of legal claims.

You may also object to the processing of your personal data where the personal data are processed for scientific and historical research purposes or for statistical purposes. In this case we will erase the personal data, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

5. Legal remedies

5.1. You may lodge a complaint with the NAIH

If, in your opinion, the processing of the personal data relating to you is contrary to the provisions of the Data Protection Regulation, you are entitled to lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH).

NAIH

president: Dr. Attila Péterfalvi

postal address: 1363 Budapest, Pf. 9.

address: 1055 Budapest, Falk Miksa utca 9-11.

Telephone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

web: <http://naih.hu>

e-mail: ugyfelszolgalat@naih.hu

5.2. You may turn to the court

If, in your opinion, the processing of the personal data relating to you is contrary to the provisions of the Data Protection Regulation and your rights laid down in the Data Protection Regulation have thereby been infringed, you are entitled to turn to the court.

In Hungary, the adjudication of the action falls within the competence of the regional court (törvényszék). The action may – at the choice of the data subject – also be brought before the regional court of the data subject's place of residence or place of stay. A person who otherwise does not have the capacity to be a party to court proceedings may also be a party to the action. The Authority may intervene in the action in the interest of the data subject winning the case. In addition to the

provisions of the Data Protection Regulation, the court proceedings are governed by the provisions of Book Two, Part Three, Title XII (Sections 2:51–2:54) of Act V of 2013 on the Civil Code, as well as by the other statutory provisions relating to court proceedings.

5.3. Damages and compensation for non-material damage

If the Data Controller causes damage by the unlawful processing of the data subject's data, or infringes the data subject's personality rights, compensation for non-material damage may be claimed from the Data Controller. The Data Controller is exempted from liability for the damage caused and from the obligation to pay compensation for non-material damage if it proves that the damage or the infringement of the data subject's personality rights was caused by an unavoidable cause falling outside the scope of the data processing.

6. Data security

We do everything we can to implement the appropriate technical and organisational measures, taking into account the state of the art of science and technology, the costs of implementation and the nature of the processing, as well as the risk to the rights and freedoms of natural persons, in order to guarantee a level of data security appropriate to the level of the risk.

We always process the personal data confidentially, with restricted access, with encryption and with the maximisation of resilience as far as possible, ensuring restorability in the event of a problem. We test our system regularly in order to guarantee security. When determining the appropriate level of security, we take into account those risks arising from the processing which result in particular from the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or unauthorised access to, personal data transmitted, stored or otherwise processed.

We do everything we can to ensure that the persons acting under our authority who have access to the personal data may process the said data solely in accordance with our instructions, unless they are required to depart therefrom by Union or Member State law.

7. Miscellaneous

The Data Controller is entitled to amend the provisions of this Privacy Notice at any time. Any amendment enters into force simultaneously with its publication on the website.

1. Annex: Explanation of the terms used in this Privacy Notice

“personal data”: any information relating to a natural person (data subject) (e.g.: name, number, location data, online identifier or data relating to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person);

“data subject”: an identifiable natural person to whom the given personal data relate. (Such as, for example: the visitor to the website, the person subscribing to the newsletter, the person applying for a job advertisement)

“processing”: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

“Data Controller”: the natural or legal person, public authority, agency or any other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

“data processing”: the performance of the technical tasks related to the processing operations;

“data processor”: the natural or legal person, public authority, agency or any other body which processes personal data on behalf of the Data Controller (on its instruction, at its direction and on the basis of the decision of the Data Controller);

“third party”: the natural or legal person, public authority, agency or any other body which is not identical with the data subject, the data controller, the data processor or the persons who, under the direct authority of the Data Controller or the data processor, are authorised to process the personal data;

“consent of the data subject”: any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

“recipient”: the natural or legal person, public authority, agency or any other body to which the personal data are disclosed, whether a third party or not. Public authorities which may have access to personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients.

2. Annex: List of recipients

Service providers and data processors cooperating with us

Service provider	Service
Nexi Germany GmbH (Helfmann-Park 7, D-65760 Eschborn)	Bank card payment service
American Express Payment Services Ltd. – (Germany) (Germany branch), Frankfurt a. Main, Germany, District Court of Frankfurt HRB 112342	Bank card payment service
Hospitality and Retail Systems Kft. – (1138 Budapest, Madarász Viktor utca 47-49.)	Internal guest data management system, NTAK and NAV connection
Oracle Hungary Kft. (1112 Budapest, Balatoni út 2/A)	OPERA PMS (Property Management System) – Software for the acquisition, management and fulfilment of reservations and hotel stays SFA (Sales Force Application) – Software for the collection and management of corporate clients and their contact persons
Sabre Hospitality Solutions GmbH – (Germany) (60549 Frankfurt am Main, Main Airport Center, Unterschweinstiege 2-14)	Software for data collection and for the creation and processing of accommodation reservations
Reviewpro (Passeig de Gràcia, 17, Planta 6, 08007 Barcelona, Spain)	Monitoring, evaluation and analysis of online guest reviews in connection with hotel stays and restaurant visits
Druckerei Hauserpresse GmbH – (Germany) (Heinrich-Krumm-Straße 18 63073 Offenbach Deutschland)	Delivery of personalised printed materials
Magyar Telekom Nyrt. (1097 Budapest, Könyves Kálmán krt. 36.)	Guest WiFi service
UniCredit Bank Hungary Zrt. (1054 Budapest, Szabadság tér 5-6.)	Bank card transactions