

## Data protection, data management information

**Service Provider's name:** Dr. Koblencz Beatrix (hereinafter referred to as "**Service Provider**")

Service address: 2040 Budaörs, Szalonka utca 6.

**Service User:** guest (hereinafter referred to as **Guest(s)/Guest(s)/Related Party**)

The Service Provider's data management principles are in accordance with the applicable data protection legislation, in particular:

- 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 Regulation (EC) No 95/46/EC (General Data Protection Regulation, GDPR);
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Infotv.);
- Act V of 2013 - on the Civil Code (Civil Code);
- Act CLV of 1997 - on Consumer Protection (Fgytv.);
- Act CVIII of 2001 - on certain issues of electronic commerce services and information society services (Eker. tv.);
- Act C of 2003 - on electronic communications (Eht.);

### 1. Payment

Guests can pay for the Service Provider's services in the manner determined by the Service Provider by cash, credit card or bank transfer.

The purpose of data processing is: to use the services of the Service Provider, to issue invoices, to register guests, to distinguish them from each other, to document purchases and payments.

Legal basis for processing: necessary for the performance of the contract [Article 6(1)(b) GDPR].

The type of personal data processed: transaction number, date and time of the transaction, content of the receipt, name, address and tax number in the case of VAT invoices, name of the service used, quantity, purchase price, method of payment, payment details (date, time, name of the items on the invoice, amount).

Possible consequences of not providing the information: the Guest may not receive a personalised invoice.

In the case of payment by card, the credit card and card payment transaction data are stored in the BBVA Bank (headquarters: Av. Tomás Roca Bosch, 3, 35130 Puerto Rico de Gran Canaria, Las Palmas, Spain).

Data transmission:

- in case of payment by credit card, the payer's ID, the amount, date and time of the transaction to BBVA Bank.

Legal basis for the transfer: necessary for the performance of the contract [Article 6(1)(b) GDPR].

## **2. Booking**

You can book accommodation in the Service Provider's apartment on goldensunnyview.com, by email, in person, as well as on partner portals , booking.com, airbnb.com.

The Service Provider stores the booking data in its own system in electronic form. Documents containing personal data generated on paper will be kept in parallel with the electronic system until the dates indicated in the relevant part of this information.

The purpose of the data processing: booking accommodation, registering and distinguishing the booking Guests, pre-ordering services for the booking Guests, maintaining contact, analysing habits, ensuring reservations.

Legal basis for processing: processing is necessary for the performance of the contract [Article 6(1)(b) GDPR].

The type of personal data processed: identification number, date of arrival and departure, number of adults and children using the service, age of children, name, company name, address, telephone number, e-mail address, payment method, name of the cardholder in case of payment by credit card, type, number, expiry date and CVC number of the card, unique booking identifier, reason for cancellation in case of cancellation.

Duration of processing:

- the data controller deletes the data of bookings cancelled without payment immediately after cancellation.

Possible consequences of not providing the information: accommodation and other services cannot be booked in advance for the Guest.

The processing of data in the course of the performance of a payment obligation arising from the use of the service is governed by the provisions of Chapter 1 of this notice.

## **3. Log in at**

The Service Provider stores the login data in its own system in electronic form. Documents containing personal data generated on paper will be kept in parallel with the electronic system until the dates indicated in the relevant part of this notice.

The purposes of the processing are: providing accommodation services, registering and distinguishing guests, providing services to guests, maintaining contact, analysing habits, making and fulfilling reservations, payment, accounting obligations.

Legal basis for processing: processing is necessary for the performance of the contract [Article 6(1)(b) GDPR].

The type of personal data processed: name, date of birth, address, nationality, car registration number, date of arrival and departure, date of completion, signature, car registration number, payment data (date, time, name of the items on the invoice, amount).

Possible consequences of not providing the information: the Guest may not use the accommodation service.

The processing of data in the course of the performance of a payment obligation arising from the use of the service is governed by the provisions of Chapter 1 of this notice.

#### **4. How personal data are stored, security of processing**

The Service Provider shall implement appropriate technical and organisational measures to ensure a level of data security appropriate to the level of risk, taking into account the state of the art and the costs of implementation, the nature, scope, circumstances and purposes of the processing and the risk to the rights and freedoms of natural persons, which is/are of varying likelihood and severity.

The Service Provider shall select and operate the IT tools used to process personal data in the course of providing the service in such a way that the processed data:

- a) accessible to authorised persons (availability);
- (b) its authenticity and authenticity is assured (authenticity of processing);
- c) its immutability can be verified (data integrity);
- d) be protected against unauthorised access (data confidentiality).

The Service Provider shall take appropriate measures to protect the data, in particular against unauthorised access, alteration, transmission, disclosure, deletion or destruction, as well as against accidental destruction, damage and loss of access due to changes in the technology used.

In order to protect the data files managed electronically in its various registers, the Service Provider shall ensure by means of appropriate technical solutions that the stored data cannot be directly linked or associated with the data subject, unless permitted by law.

The Service Provider shall ensure the security of data processing by means of technical and organisational measures that provide a level of protection appropriate to the risks associated with data processing, taking into account the state of the art.

The Service Provider shall retain during the data processing.

- a) confidentiality: it protects the information so that only those who are entitled to it have access to it;
- b) integrity: it protects the accuracy and completeness of the information and the method of processing;
- c) availability: ensuring that the rightful user has effective access to the information he needs and the means to access it when he needs it.

The Service Provider, as the data controller, shall keep a record of any data breaches, indicating the facts related to the data breach, its effects and the measures taken to remedy it.

The Service Provider shall notify the National Authority for Data Protection and Freedom of Information of any data breach without delay and, if possible, no later than 72 hours after the data breach has come to its attention, unless the data breach is unlikely to pose a risk to the rights and freedoms of natural persons.

## **5. Data controller's data, contact details**

Name: Dr. Beatrix Koblencz  
Title: 2040 Budaörs, Szalonka utca 6.  
Phone number: +36 30 930 56 86  
E-mail: grancanariahaiti505@gmail.com

## **6. Remedies**

The data subject may request information on the processing of his or her personal data, and may request the rectification, erasure, withdrawal or restriction of processing of his or her personal data, except for mandatory processing, and may exercise his or her right to data portability and objection as indicated when the data were collected, at the above contact details of the controller.

### Right to information:

At the request of the data subject, the Service Provider shall take appropriate measures to provide the data subject with all the information referred to in Articles 13 and 14 of the GDPR and all the information referred to in Articles 15 to 22 and 34 of the GDPR concerning the processing of personal data in a concise, transparent, intelligible and easily accessible form, in clear and plain language.

### The right of access of the data subject:

The data subject shall have the right to obtain from the controller feedback as to whether or not his or her personal data are being processed and, if such processing is taking place, the right to access the personal data and the following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom or with which the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations; the envisaged period of storage of the personal data; the right to rectification, erasure or restriction of processing and the right to object; the

right to lodge a complaint with a supervisory authority; information on the data sources; the fact of automated decision-making, including the profiling, the logic used and clear information on the significance of such processing and the likely consequences for the data subject. In the event of a transfer of personal data to a third country or an international organisation, the data subject is entitled to be informed of the appropriate safeguards for the transfer.

The Service Provider shall provide the data subject with a copy of the personal data processed. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. At the request of the data subject, the Service Provider shall provide the information in electronic form.

The right to information can be exercised through the contact details indicated above. Upon request, information may also be provided orally to the data subject, following a credible proof of identity and identification.

Right of rectification:

The data subject may request the correction of inaccurate personal data concerning him/her processed by the Service Provider and the completion of incomplete data.

Right to erasure:

The data subject shall have the right to have personal data concerning him or her erased by the Service Provider without undue delay upon his or her request if one of the following grounds applies:

- (a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- (b) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- (c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- (e) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject;
- f) the personal data were collected in connection with the provision of information society services.

The erasure of data may not be initiated if the processing is necessary: for the exercise of the right to freedom of expression and information; for compliance with an obligation under Union or Member State law to process personal data or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; for public health purposes or for archiving, scientific or historical research purposes or statistical purposes in the public interest; or for the establishment, exercise or defence of legal claims.

Right to restriction of processing:

At the request of the data subject, the Service Provider shall restrict the processing of data if one of the following conditions is met:

- (a) the data subject contests the accuracy of the personal data, in which case the restriction shall apply for the period of time necessary to allow the accuracy of the personal data to be verified;
- (b) the processing is unlawful and the data subject opposes the erasure of the data and requests instead the restriction of their use;
- (c) the controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims; or
- (d) the data subject has objected to the processing; in this case, the restriction shall apply for the period until it is established whether the legitimate grounds of the controller override those of the data subject.

Where processing is restricted, personal data, other than storage, may be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or of an important public interest of the Union or of a Member State.

The Service Provider shall inform the data subject in advance of the lifting of the restriction on data processing.

#### Right to data retention:

The data subject shall have the right to obtain the personal data concerning him or her which he or she has provided to the controller in a structured, commonly used, machine-readable format and to transmit such data to another controller.

#### Right to object:

The data subject shall have the right to object at any time, on grounds relating to his or her particular situation, to processing of his or her personal data necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or necessary for the purposes of the legitimate interests pursued by the controller or by a third party, including profiling based on those provisions.

In the event of an objection, the controller may no longer process the personal data, unless there are compelling legitimate grounds for doing so which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing.

In the event of an objection to the processing of personal data for direct marketing purposes, the data will not be processed by the Service Provider for this purpose.

#### Automated decision-making on individual cases, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above right shall not apply where the processing is

- (a) necessary for the conclusion or performance of a contract between the data subject and the controller;
- (b) permitted by Union or Member State law applicable to the controller which also lays down appropriate measures to protect the rights and freedoms and legitimate interests of the data subject; or
- (c) based on the explicit consent of the data subject.

#### Right of withdrawal

The data subject has the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

#### Procedural rules

Without undue delay and in any event within one month of receipt of the request, the controller shall inform the data subject of the action taken on the request pursuant to Articles 15 to 22 of the GDPR. Where necessary, taking into account the complexity of the request and the number of requests, this period may be extended by a further two months.

The data controller shall inform the data subject of the extension of the time limit, stating the reasons for the delay, within one month of receipt of the request. Where the data subject has made the request by electronic means, the information shall be provided by electronic means, unless the data subject requests otherwise.

If the controller fails to act on the data subject's request, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the possibility for the data subject to lodge a complaint with a supervisory authority and to exercise his or her right of judicial remedy.

The Service Provider shall provide the requested information and data free of charge. Where the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the controller may, taking into account the administrative costs of providing the information or information requested or of taking the action requested, charge a reasonable fee or refuse to act on the request.

The controller shall inform any recipient to whom or with whom the personal data have been disclosed of any rectification, erasure or restriction of processing that it has carried out, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject, at his or her request, of those recipients.

The data controller shall provide the data subject with a copy of the personal data processed. For additional copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. If the data subject has made the request by electronic means, the information shall be provided in electronic format unless the data subject requests otherwise.

#### Compensation and damages:

Any person who has suffered pecuniary or non-pecuniary damage as a result of a breach of the Data Protection Regulation shall be entitled to receive compensation from the controller or processor for the damage suffered. A processor shall be liable for damage caused by processing only if it has failed to comply with the obligations expressly imposed on processors by law or if it has disregarded or acted contrary to lawful instructions from the controller.

Where more than one controller or more than one processor, or both controller and processor, are involved in the same processing and are liable for the damage caused by the processing, each controller or processor is jointly and severally liable for the total damage.

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

Right to apply to the courts:

In the event of a breach of his or her rights, the data subject may bring an action against the controller (at the defendant's place of establishment or the data subject's place of residence, according to the data subject's choice) before the courts. The court shall decide the case out of turn. Legal proceedings relating to the protection of personal data are free of charge.

Data protection authority procedure:

You can lodge a complaint with the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

Head office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Pf.: 5.