

**LION'S GARDEN HOTEL \*\*\*\* BUDAPEST**  
**PRIVACY STATEMENT**  
**25/05/2018**

Thank you for visiting lionsgarden.hu or lions-garden.com. We treat the personal data of our Guests with great consideration.

This privacy statement (the "**Statement**") applies to Lion's Garden Hotel\*\*\*\* Budapest (the "**Hotel**").

We have developed this Statement to explain our practices regarding the personal information we collect from you or about you on this site, through written or verbal communications with us, when you visit our Hotel, or from other sources. This Statement also explains how we'll store and handle that data, when and why we share your data with third-party service providers, and how the law protects you.

**By using any of our services or products and/or by agreeing to this Statement, e.g. in the context of registering for any of our services or products, you understand and acknowledge that we will collect and use personal information as described in this Statement.**

**It is important that you read this Statement so that you are aware of how and why we are using your data.**

Please note that this Statement does not apply to our processing of personal information on behalf of and subject to the instructions of third parties such as airlines, car rental companies and other service providers, companies that organize or offer packaged travel arrangements, marketing partners, or corporate customers.

**PERSONAL INFORMATION WE COLLECT**

Personal data, or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect personal information at every touch point or guest interaction (e.g. third-party booking systems, point-of-sale systems, booking engine of the Hotel, email marketing messages, phone, personal enquiry by front-desk), and in conducting every aspect of our business, we may collect personal information.

This personal information may include:

- Identity Data (first name, last name, title, place and date of birth; gender; citizenship; address; passport (or other ID) number and date and place of issue; travel history);
- Contact Data (address, mailing address, e-mail address, billing address and telephone numbers);
- Financial Data (bank account and payment card details);
- Reservation Data (information related to your reservation, stay or visit to the Hotel);
- Membership Data (participation in a membership or loyalty program);
- Marketing and Communication Data (participation in a marketing program [even if you do not stay at the Hotel]; guest preferences; marketing and communication preferences);
- Other Data (information about vehicles you may bring onto our Hotel; frequent flyer or travel partner program affiliation and member number; hotel, airline and rental car packages booked; groups with which you are associated for stays at hotels; information provided on membership and account applications; and other types of information that you choose to provide to us or that we may obtain about you).

In addition, we collect other personal information in certain cases, such as:

- **Surveys:** Completion of surveys is voluntary – we process the information obtained from surveys on the basis of your consent and in furtherance of our business interests, including marketing, service improvements and analytics.
  
- **On-property Collection:**
  - When you make a reservation and when you stay at our Hotel, we process your name, address, contact information, along with the details of your stay (arrival and departure day and time, vehicle information and information regarding others traveling or staying with you), on the basis of our contractual relationship with you. We also process such data for our business interests, including for marketing and service improvements.
  - We collect certain additional personal information during registration/check-in at our properties (such as national ID or passport information), as necessary to comply with our legal obligations.
  - We use closed circuit television and other security measures at our property that may capture or record images of guests and visitors in public areas, as well as information related to your location while on our property the protection of our staff, guests and visitors.
  - We process personal information in connection with on-property services (such as concierge services, spas, activities, child care services and equipment rental), in order to provide the services to you and for our business interests including for marketing and service improvements.
  
- **Event Profiles:** If you plan an event with us, we collect meeting and event specifications, the date of the event, number of guests, details of the guest rooms, and, for corporate events, information on your organization (name, annual budget, and number of sponsored events per year) on the basis of our contractual relationship with you and for our business interests, including for marketing and service improvements. We also collect information about the guests that are a part of your group or event. If you visit us as part of a group, we may have personal information about you provided to us by the group and may market to you as a result of your stay with a group or attendance at an event in accordance with your preferences as permitted by law. If you visit us as part of an event, we may share personal information about you with the event planners, as permitted by law.

We process the personal information obtained in connection with your event on the basis of our contractual relationship with you and for our business interests, including for marketing and service improvements.

## **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## **PERSONAL INFORMATION WE COLLECT FROM THIRD PARTIES**

We may also collect information about you from third parties, including information from airline, payment card, and other partners; and from other third-party sources that are lawfully entitled to share your data with us. We use and share this information (and may append this information to the other information we have on file for you) for the purposes described in this Statement.

## **USE OF PERSONAL INFORMATION COLLECTED ABOUT YOU**

We use your personal information in a number of ways, including to provide and personalize the services you request and expect from our Hotel, to offer you the expected level of hospitality in-room, conduct direct marketing and sales promotions and as set forth below in more detail. We will collect your consent prior to processing your data where required by applicable law.

We are obligated to collect certain data, including your name, address, payment information, and travel document information, in order to process your reservation. Failure to provide this information will result in our inability to process your reservation.

We will use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interest (or those of a third party) and your interests and fundamental rights do not override those interest.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. Where we do not rely on consent as a legal basis for processing your personal data. Where we rely on consent, you have the right to withdraw consent to marketing at any time by contacting us.

The following list provides general detail about the types of data we process, why we process it, and the lawful basis upon which we do so:

- To register you as a Guest of our Hotel:

Types of data: Identity Data, Contact Data, Financial Data, Reservation Data

Lawful basis: Performance of a contract with you

- To provide you our services as a Guest of our Hotel:

Types of data: Identity Data, Contact Data, Financial Data, Reservation Data, Membership Data, Marketing and Communication Data and Other Data

Lawful basis: Performance of a contract with you

## **MARKETING**

We may use personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services, newsletters and offers may be relevant for you (we call this marketing).

You will receive marketing communications (including newsletters) from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a survey or registered for a promotion, or you have consented to receive marketing communications from us and, in each case, you have not opted out of receiving that marketing.

You can ask us to stop sending you marketing messages or adjust your marketing preferences at any time by contacting us.

## **THIRD-PARTY MARKETING**

We will not disclose, rent, sell, share or otherwise transfer your personal data with third parties for marketing purposes.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis upon which we do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **PERSONAL INFORMATION WE SHARE**

We share your personal data within the company.

In order to offer you the expected level of hospitality and to provide you with the best level of service, we may share your personal information among our trusted service providers, and other third parties as set forth in detail below:

- **Group Events or Meetings:** If you visit our Hotel as part of a group event or meeting, information collected for meeting and event planning may be shared with the organizers of those meetings and events, and, where appropriate, guests who organize or participate in the meeting or event.

- **Business Partners:** We may partner with other companies to provide you with products, services, or offers based upon your experiences at our Hotel and may share your information with our business partners accordingly. For example, we may help to arrange rental cars or other services from our business partners, and share personal information with our business partners in order to provide those services. We may also share your personal information, such as your email address, with our corporate travel partners to help them assess compliance with travel policies or participation in special rate plans or to engage in co-branded marketing with our corporate travel partners. We may also work with third parties, such as payment card partners, to allow us and our partners to deliver advertisements to our shared customers. Our partners may be able to provide more relevant offers to you based upon information that we share about your experiences at our Hotel. We may share a hashed version of your email address with third parties using available security measures that may match it with their own hashed versions of email addresses so that they can send online and email advertisements to you on our behalf.
  
- **On-property Services:** We may share personal information with third-party providers of on-property services such as concierge services, spa treatments, or dining experiences.
  
- **Service Providers:** We rely on third parties to provide services and products on our behalf and may share your personal information with them as appropriate. Generally, our service providers are contractually obligated to protect your personal information and may not otherwise use or share your personal information, except as may be required by law. However, our fraud detection service providers may use, but not share, your personal information for fraud detection purposes. We may use service providers to communicate news and deliver promotional and transactional materials to you on our behalf, including personalized online and mobile advertising in accordance with your preferences and applicable law. The Hotel will only work with parties that offer a method to opt-out of such advertising.
  
- **Business Transactions:** As we develop our business, we might sell, buy, restructure or reorganize our business or assets. In such circumstances, our Hotel may transfer, sell or assign information collected, to one or more affiliated or unaffiliated third parties in connection with these business transactions. To the extent that Hungarian law requires it, we will provide notice of our intent to transfer personal data to a third party for this purpose, and explain how you can object to such transfer.
  
- **Other:** In addition, our Hotel may disclose personal information in order to: (i) comply with applicable laws, (ii) respond to governmental inquiries or requests from public authorities, (iii) comply with valid legal process, (iv) protect the rights, privacy, safety or property of the Hotel, site visitors, guests, employees or the public, (v) permit us to pursue available remedies or limit the damages that we may sustain, (vi) enforce our websites' terms and conditions, and (vii) respond to an emergency.

All of our service providers are required to maintain the confidentiality and security of your personal data and to use it only in compliance with data privacy laws and for specified purposes in compliance with our instructions.

Each service provider is also responsible for their use of your personal data, according to rules they set in their own privacy policies.

## **SENSITIVE INFORMATION**

The term "sensitive information" refers to information related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sex life, or sexual orientation and genetic information.

We do not generally collect sensitive information unless it is volunteered by you or unless we are required to do so pursuant to applicable laws or regulations. Nor do we collect any data about criminal convictions and offences.

We may use health data provided by you to serve you better and meet your particular needs.

## **PERSONAL INFORMATION FROM CHILDREN**

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not allow your children to submit personal information without your permission.

## **LINKS TO THIRD-PARTY WEBSITES AND SERVICES**

Our site may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If you provide information on and use third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

The Hotel may also partner with an Internet provider to offer Internet access to our guests. Your use of on-property Internet service is subject to the third-party Internet provider's terms of use and privacy policy.

## **PROTECTING PERSONAL INFORMATION**

The Hotel will take reasonable measures to: (i) protect personal information from unauthorized access, disclosure, alteration or destruction, and (ii) keep personal information accurate and up-to-date as appropriate. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.

Your personal data is stored securely on databases, servers and hard copies in filing cabinet. These databases, servers and hard copies are maintained either by us or by our third-party service providers.

For our website we use HTTPS – your web browser should indicate that such pages are secure. Access to your personal data is password-protected, and personal data are secured by SSL encryption.

We maintain administrative, technical and physical safeguards to protect against unauthorized access, use, modification and disclosure of any personal data in our custody or control. We take steps to ensure that only designated individuals have access to this information, so internal access to personal data is restricted to specific employees.

We may use your personal data to create a guest profile that is stored in the Hotel. The stored guest profile information may include guest name, address, phone numbers, e-mail and credit card number. The guest profile may also include certain information regarding your service preferences.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, unless a longer retention period is required or permitted by applicable law.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will destroy your personal information as early as practicable and in a way that the information may not be restored or reconstructed.

If printed on paper, the personal information will be destroyed in a secure manner, such as by cross-shredding or incinerating the paper documents or otherwise and, if saved in electronic form, the personal information will be destroyed by technical means to ensure the information may not be restored or reconstructed at a later time.

## **YOUR LEGAL RIGHTS**

You have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with Hungarian law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

We will respond to all such requests within 30 days of our receipt of the request, unless there are extenuating circumstances, in which event we may take up to 60 days to respond. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity. We may charge you a reasonable fee for subsequent copies of data that you request.

If you have concerns about our data practices or the exercise of your rights, please contact us.

#### **STATEMENT MODIFICATIONS**

We may modify this Statement from time to time. When we make material changes to this Statement we will post a link to the revised Statement on the homepage of our site. You can tell when this Statement was last updated by looking at the date at the top of the Statement. Any changes to our Statement will become effective upon posting of the revised Statement on the site. Use of the site, any of our products and services, and/or providing consent to the updated Statement following such changes constitutes your acceptance of the revised Statement then in effect.

Please note that the data protection law in Hungary will change on 25 May 2018. Although this Statement sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests until after that date as we are still working towards getting our systems ready for some of these changes.

It is important that the personal data we hold about you is accurate and current.

#### **CONTACT YOUR DATA CONTROLLER**

Your data controller is Lion's Garden Hotel, which is operated by **Brownhouse Management Kft.** (the "**Data Controller**").

The representative of the Data Controller with regard to this Statement is Mr. Imre Kövér, the managing director of the Hotel.

Seat of the Data Controller is: 1146 Budapest, Cházár András utca 4.

Phone number: +36 (1) 273-20-70

Fax number: +36 (1) 221-42-74

Email: [info@lions-garden.com](mailto:info@lions-garden.com)

[www.lions-garden.com](http://www.lions-garden.com)

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



If you have any questions about this Statement or how our Hotel processes your personal information, or if you wish to either provide a compliment or a complaint, please contact us. We will respond within 30 days or sooner if practicable.

## **COMPLAINT**

The responsible authority in Hungary is: NAIH (Nemzeti Adatvédelmi és Információszabadság Hatóság).

Registered seat of NAIH is: 1125 Budapest, Szilágyi Erzsébet fasor 22/c.

Phone number: +36 (1) 391 14 00

Fax number: +36 (1) 391 14 10

Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)