

# Privacy Notice

## 25 Garzon Szolnok

|                          |                                                                                                                                            |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| Data Controller          | AZORIUM PALATIUM KFT.                                                                                                                      |
| Registered office        | 5000 Szolnok, Kőrösi út 43.                                                                                                                |
| Tax number               | 24676359-1-16                                                                                                                              |
| Company registration no. | 16-09-022437                                                                                                                               |
| Representative           | László Fenyves, Managing Director                                                                                                          |
| Accommodation            | 25 Garzon Szolnok                                                                                                                          |
| Accommodation address    | 5000 Szolnok, Kőrösi út 45/G                                                                                                               |
| Telephone                | +36 70 421 2863                                                                                                                            |
| E-mail                   | connect@hotelszolnok.com                                                                                                                   |
| Data Protection Officer  | The Data Controller is not required to appoint a Data Protection Officer under Article 37 of the GDPR and therefore has not appointed one. |
| Effective date           | 20 August 2026                                                                                                                             |
| Version                  | 1.2                                                                                                                                        |

### I. Introduction, purpose and scope of the notice

The Data Controller processes personal data in the course of providing accommodation services. This notice describes what data are processed, for what purpose, on what legal basis and for how long, to whom the data are disclosed, and what rights you have.

The notice applies to guests of the accommodation, persons placing bookings and their contacts, and persons present in areas of the accommodation monitored by cameras.

Applicable law: Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR) and Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Hungarian Infotv.).

### II. Definitions

Personal data: any information relating to an identified or identifiable natural person.

Data Controller: the person determining the purposes and means of processing – in this case, the company named above.

Data Processor: a person processing personal data on behalf of the Data Controller, for example the accommodation software or hosting provider.

Data Subject: the person whose personal data are processed.

### III. Principles, legal basis and retention period

The Data Controller processes personal data lawfully, fairly and transparently, for specified purposes and in accordance with the principle of data minimisation. For each processing activity, the legal basis and retention period are identified; after the purpose ends, the data are deleted unless legislation requires a longer retention period.

### IV. Individual processing activities by purpose

#### IV.1. Booking and contract formation

Data processed: name, e-mail address, telephone number, booking details (period, number of persons); for corporate customers, the contact person's name and contact details, and company data.

Purpose: conclusion and performance of the accommodation-service contract.

Legal basis: GDPR Article 6(1)(b) – performance of a contract; for a corporate contact person, Article 6(1)(f) – legitimate interest in maintaining contact.

Retention: the general limitation period of 5 years from termination of the contract.

## **IV.2. Invoicing and payment**

Data processed: billing name and address, tax number, performance and payment data.

Purpose: compliance with statutory invoicing and accounting obligations.

Legal basis: GDPR Article 6(1)(c) – legal obligation.

Retention: accounting documents are retained for 8 years under Section 169 of Act C of 2000 on Accounting.

## **IV.3. Statutory data reporting – important distinction**

Two types of legal relationship may arise at the accommodation, and the data-reporting obligations are not the same for both:

1. Accommodation service: the Data Controller is legally required to transmit guest data to the National Tourism Data Supply Centre (NTAK) and to record guest identity-document data through the VIZA system. The data processed are: name, place and date of birth, mother's name, nationality, type and number of identity document, residential address and duration of stay. Identity-document data are recorded using an identity-document reader.

2. Medium- or long-term premises rental under an individual agreement: there is no NTAK or VIZA data-reporting obligation and therefore no such reporting takes place. In this case, the necessary data are processed solely for performance of the contract and preparation of accommodation-provider documentation.

Legal basis: in case 1, GDPR Article 6(1)(c) – legal obligation; in case 2, Article 6(1)(b) – performance of a contract.

Retention: for the period specified by law, or until the contractual purpose ends.

## **IV.4. Contact and quotation requests**

Data processed: name, e-mail address, telephone number, content of the enquiry.

Purpose: responding to the enquiry and providing a quotation.

Legal basis: GDPR Article 6(1)(f) – legitimate interest, and steps prior to entering into a contract.

Retention: 1 year from expiry of the quotation; if a contract is concluded, according to Section IV.1.

## **IV.5. CCTV monitoring**

Where: communal areas of the accommodation and outdoor areas used for circulation. No camera operates in the studios, bathrooms or any other room affecting privacy.

Data processed: image of a person present in the monitored area and the time of recording.

Purpose: property protection, the safety of guests and the accommodation, and investigation of damage.

Legal basis: GDPR Article 6(1)(f) – the Data Controller's legitimate interest in property protection and accommodation security. The monitoring is not carried out under the legislation applicable to security companies because the Data Controller operates the system on its own property and not as a security business.

Retention period: 7 days, in cloud-based storage.

The reason for the 7-day retention period is that the accommodation is not continuously staffed and the studios are not cleaned daily, so potential damage may typically not be discovered immediately. With a shorter retention period of only a few days, the recording might already be unavailable when the damage is discovered, meaning the property-protection purpose could not be achieved. The retention period is therefore aligned with the delay in detecting damage and is the shortest period considered necessary.

Access: security-service staff may access recordings on a case-by-case basis with written authorisation from the managing director; access is logged. The Data Controller provides recordings to authorised state authorities (police, courts or other authorities) upon an official request, on the legal basis specified in the request. The fact, time and legal basis of disclosure are recorded.

On-site information: signs indicating CCTV monitoring are displayed in monitored areas.

## **IV.6. Reviews and accommodation portals**

If you book through a booking portal, the portal also acts as an independent data controller and processes your data according to its own privacy notice. The Data Controller receives from the portal the data necessary to perform the booking.

#### **IV.7. Newsletter and marketing**

The Data Controller does not send newsletters and does not conduct marketing communications without consent. If such processing is introduced in the future, it will be carried out solely on the basis of the data subject's prior, voluntary and withdrawable consent, with an unsubscribe option, and this notice will be amended accordingly.

### **V. Data security**

The Data Controller stores data in password-protected, access-restricted systems and ensures that only authorised persons have access. Paper-based documents are stored in a locked location.

### **VI. Cookies**

Details of the website's cookie handling – the cookies used, their purpose, lifetime and available settings – are contained in the cookie notice published on the website. This notice does not regulate the website's cookie handling.

### **VII. Data disclosures and data processors**

The Data Controller uses the following data processors:

| Data processor                                                          | Task                                                                  | Categories of data processed            |
|-------------------------------------------------------------------------|-----------------------------------------------------------------------|-----------------------------------------|
| Zoho Corporation B.V.<br>(Beneluxlaan 4B, 3527 HT Utrecht, Netherlands) | Operation of the correspondence and customer relationship system      | Contact details, correspondence content |
| Website hosting provider                                                | Operation of the website and storage of data submitted on the website | Data submitted through the contact form |
| Accountant                                                              | Accounting activities                                                 | Billing data                            |
| Security service                                                        | Case-by-case viewing of CCTV recordings                               | Image                                   |

At the request of the Data Subject, the Data Controller promptly provides written information at the above contact details about the exact company name, registered office and processing activities of the processors. In response to an official request, the Data Controller provides data to the requesting authority within the scope required by law.

### **VIII. Rights of the Data Subject**

Under Articles 13–22 of the GDPR, you have the following rights:

- right to information and access,
- right to rectification,
- right to erasure (the “right to be forgotten”),
- right to restriction of processing,
- right to data portability,
- right to object to processing based on legitimate interest – including CCTV monitoring,
- right to withdraw consent where processing is based on consent.

You may submit your request to [connect@hotelszolnok.com](mailto:connect@hotelszolnok.com) or by letter sent to the registered office. The Data Controller fulfils the request within a maximum of one month.

A copy of CCTV footage may be requested by a person whose right or legitimate interest is affected by the recording; the request must be submitted within the retention period.

### **IX. Legal remedies**

If you believe that processing infringes your rights, please contact us first. You may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (NAIH), 1055 Budapest,

Falk Miksa utca 9-11.; [www.naih.hu](http://www.naih.hu), or bring proceedings before a court. Proceedings may also be initiated before the court competent according to your place of residence.

## **X. Data Controller contact details**

AZORIUM PALATIUM KFT.

5000 Szolnok, Kőrösi út 43.

Telephone: +36 70 421 2863

E-mail: [connect@hotelszolnok.com](mailto:connect@hotelszolnok.com)

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