

AVALON PARK Kft. Information Note on Data Processing

AVALON PARK Kft. (corporate registration number: 01-09-986876, tax number: 23966066-2-42, head office: H-1075 Budapest, Károly körút 1. 1. em. 2., website <https://avalonresort.hu>, <https://avalonpark.hu>, <http://angelstation.hu/>, hereinafter referred to as AVALON PARK Kft., as the service provider or controller), as the Data Controller agrees to be bound by the content of this legal notice.

The purpose of this information note is to define the privacy and data processing principles applied by AVALON PARK Kft. together with the data protection and processing policy of the Corporation.

AVALON PARK Kft. takes the obligation to ensure that any data processing activity related to its scope of activities is in accordance with the expectations included in this information note, furthermore, in Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter referred to as: the Information Act) and the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as: the GDPR).

AVALON PARK Kft. is committed to protecting the personal data of its clients and partners and respecting its clients' right to informational self-determination is a priority issue for the Corporation AVALON PARK Kft. processes personal information confidentially and will take all security, technical and organizational measures that guarantee the security of data.

Definitions

- **'Personal data'** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **'Processing'** means 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;
- **'Restriction of processing'** means the marking of stored personal data with the aim of limiting their processing in the future;
- **'Data Controller'** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **'Processor'** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Data Controller;
- **'Third party'** means a natural or legal person, public authority, agency or body other than the data subject, Data Controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
- **'Consent'** of the data subject means 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;
- **'Personal data breach'** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

The scope of personal data; the purpose, legal basis and duration of data processing

Processing by the Data Controller is based on a voluntary consent, contractual or statutory obligation. The legal basis for processing by the Controller is the fulfilment of services provided or used by the Data Controller and the performance of contracts concluded in other subject matters (hereinafter referred to as: the Contracts), and its purpose is to fulfil the rights and obligations arising out of the contract.

The Data Controller shall be authorized to manage and retain personal data until the completion of the purpose of the contracts specified above, and until the date of the full settlement of accounts or for the retention period provided for by the regulation necessary for the fulfilment of the statutory obligation.

Primarily our competent internal staff members shall be authorized to have access to the data processed by the Data Controller, we do not disclose them to third parties, except for a legitimate interest (such as: debt collection), to meet our statutory obligations or if the prior express consent of the User has been granted to it.

The Data Controller may use the services of third party - GDPR-compliant - processors assigned in a written contract, to perform the Contracts.

The Parties and the subcontractors used by them as processors may process any and all personal data of the Data Controller or of third person controllers exclusively for the performance of the services performed or used by the Controller, for the performance of the contracts concluded in other subject matters and for the fulfilment of his rights and obligations.

The Data Controller hereby confirms that the party receiving data as the Processor is authorized to process personal data.

If, under the relevant data protection regulations, any of the Parties acts as Processor - in accordance with the terms and conditions specified in Article 28 of the GDPR Regulation - the Parties shall be obliged to conclude a written agreement on data processing or a matching agreement, to comply with the law. Should any need occur, during the performance of the contracts, at the recipient processor to transmit the personal data to the third party processor, the recipient processor shall be obliged to obtain the prior written consent of the Data Controller, furthermore, it shall be obliged to conclude a similar, written contract on data processing in compliance with the GDPR and to the extent specified therein.

In case the third party processors fail to meet their obligations set out in the GDPR, the recipient party shall be fully liable towards the Data Controller under the GDPR. If the Contracts become terminated, at the written request of the Data Controller party - acting reasonably -, the recipient processor shall be obliged to return to the Data Controller party all personal data processed, together with the data generated as a result of processing the above; furthermore, the processor shall be obliged to delete any and all copies made thereof, with the exception of the data subject to data retention obligation under the law.

During the performance of the Contracts and the prevailing retention period, the Recipient party shall ensure:

1. the protection of the personal information of the Data Controller party by means of the most up-to-date security measures; furthermore,
2. a limited access of qualified workers under the obligation of adequate confidentiality.

The data subject shall be authorized to receive feedback from the Data Controller about whether the processing of their personal information is in process, and if such data are being processed, the data subject shall be authorised to get access to the personal data and the following information.

The data subject shall have the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of data processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the Data Controller shall have the obligation to erase personal data without undue delay where other criteria are met.

The data subject shall have the right to obtain from the Data Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the Data Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the Data Controller override those of the data subject.

The Data Controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Data Controller shall inform the data subject about those recipients if the data subject requests it.

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data Controller without hindrance from the controller to which the personal data have been provided that the processing is based on voluntary consent or on a contract and the processing is carried out by automated means.

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

Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

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.

If any personal data breach occurring within the system of the Data Controller is likely to result in a high risk to the rights and freedoms of the natural person, the Data Controller should communicate it to the data subject without undue delay.

The way of storing personal data and the security of data processing

The IT systems and other data retention locations of the Data Controller are located at its headquarters, branch offices and the relevant servers.

The Data Controller shall select and operate the IT tools for personal data processing, used during the performance of the service, so that:

- the data processed shall only be accessible by authorized persons;
- the authenticity and the authentication of the processed data shall be granted;
- the stability of the data processed shall be verifiable;
- the data processed shall be protected against any

unauthorized access.

The Data Controller shall protect the data by appropriate measures, in particular, against any unauthorized access, alteration, transmission, disclosure, deletion or destruction, as well as the accidental destruction and damage; furthermore, against becoming inaccessible due to the change in the technique applied.

In view of the current state-of-the-art technology, the Data Controller shall ensure the security protection of data processing by technical, organisational and structural measures, which provide a level of protection appropriate to the risks occurring in connection with data processing.

At the same time, however, we inform the data subjects that regardless of the protocol (e-mail, web, ftp, etc.), the electronic messages transmitted over the Internet are vulnerable to network threats that lead to dishonest activities, challenging a contract or the disclosure or modification of information. In order to ensure protection against such threats, the Data Controller shall take all the precautionary measures that can be expected from the Controller.

Cookies

During the visits made at <https://avalonresort.hu>, <https://avalonpark.hu>, <http://angelstation.hu>/the Service Provider sends one or more cookies - that is, a small file containing a string of characters - to the computer of the visitor, through which the browser will be individually identifiable. We send these cookies to the visitor's computer only if certain sub-pages are visited, thus in the cookies we only store no other information than the fact and date of the visit made to the given sub-page.

The cookies sent this way shall be used as follows: the external service providers, including Google, use these cookies to store information related to the User's any previous visit to <https://avalonresort.hu>, <https://avalonpark.hu>, <http://angelstation.hu>/If the User does not want Google or other service providers to measure the above data for the purposes and in the way described above, the User should install a blocking plugin into his or her browser.

The "Help" feature in the menu bar of most of the browsers provides information on

- how to block cookies in the browser,
- how to accept new cookies, or
- how to instruct your browser to set a new cookie or
- how to turn off other cookies.

Customer relations

If you have any comment, question or problem related to our company, the data processing activities we perform or to using our services, you can contact us at the contact details indicated on our website.

Other

We shall provide information on any data processing not listed in this information note upon recording the relevant data.

Our company reserves the right to unilaterally modify this information note on data processing after a prior notice sent to the data subjects.

Our company shall not verify the personal information provided to it. Only the person who provided the data is responsible for the compliance of the data provided. When entering his/her e-mail address, the

data subject shall also assume liability for ensuring that services shall only be used by him/her from the e-mail address in question.

Please note that the investigating authority, the Hungarian National Authority for Data Protection and Freedom of Information or other bodies authorised by the law may contact AVALON PARK Kft. to provide information, disclose or transmit data or make available documents.

Procedural rules

30 days are available for the Data Controller to provide information on, delete or correct the personal data. If the Data Controller fails to fulfil the request made by the data subject, it shall communicate the reasons for the rejections in writing, within 30 days.

Data Protection Authority

Complaints may be filed with the Hungarian National Authority for Data Protection and Freedom of Information at the following address:

Nemzeti Adatvédelmi és Információszabadság Hatóság, H-1125 Budapest, Szilágyi Erzsébet fasor 22/C.,
Correspondence address: H-1530 Budapest, P.O.Box: 5., Telephone: +36 1 / 391 - 1400, Fax: +36 1 / 391 - 1410, E-mail: ugyfelszolgalat@naih.hu, Website: <http://www.naih.hu>

All the obligations included in this Information Note will remain effective even after the termination of the Contracts.