



Avalon Park Kft.

www.avalonpark.hu
www.avalonresort.hu

PRIVACY NOTICE

21 December 2023.



P r i v a c y
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S e r v i c e s

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1. INTRODUCTION

Avalon Park Kft. (H-1062 Budapest, Andrásy út 126., hereinafter: service provider, data controller) as the data controller, acknowledges the contents of this legal notice as binding on it. It undertakes to ensure that any processing of data relating to its activities complies with the requirements set out in this policy and in the legislation in force.

The privacy notice of Avalon Park Kft. is available on an ongoing basis at <https://avalonpark.hu/adatkezeles>.

Avalon Park Kft. reserves the right to change this information notice at any time. It will of course inform the public of any changes in good time.

If you have any questions about this notice, please [contact us](#) and our staff will answer them.

Avalon Park Kft. is committed to protecting the personal data of its customers and partners, and attaches great importance to respecting the right of its customers to information self-determination.

Avalon Park Kft. shall process personal data confidentially and take all security, technical and organizational measures to ensure the security of the data.

Avalon Park Kft. presents its data processing practices below.

2. SCOPE OF PERSONAL DATA, PURPOSE, LEGAL BASIS AND DURATION OF PROCESSING

Avalon Park Kft. sets out below its data processing principles, the expectations it has set for itself as data controller and the standards it adheres to. Its data processing principles comply 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 Directive 95/46/EC (General Data Protection Regulation, GDPR);
- ✓ Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Information Act);
- ✓ Act V of 2013 on the Civil Code (Civil Code);
- ✓ Act C of 1990 on Local Taxes (Local Taxes Act);
- ✓ Act CLV of 1997 on Consumer Protection (Consumer Protection Act);
- ✓ Act XC of 2017 on Criminal Procedure (Criminal Procedure Act);
- ✓ Act C of 2000 on Accounting (Accounting Act);
- ✓ Act CXXVII of 2007 on Value Added Tax (VAT Act);
- ✓ Act CVIII of 2001 on Certain Issues of Electronic Commerce Services and Information Society Services (Electronic Commerce Act);
- ✓ Act CLXIV of 2005 on Commerce (Commerce Act);
- ✓ Act CLVI of 2016 on State Tasks for the Development of Tourist Regions (Tourism Act);
- ✓ Act II of 2007 on the Entry and Residence of Third-country Nationals (Third-country Nationals Act);
- ✓ Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions on Economic Advertising (Advertising Act).



PAYING IN AVALON PARK

2.1. PAYING IN AVALON PARK

Visitors, guests, users of the services may pay for the services of Avalon Park, described in the subsequent chapters of this notice, in the manner determined by Avalon Park Kft. by cash, gift voucher, SZÉP card or credit card.

Purpose of data processing: reimbursement of Avalon Park's services, issuing of receipts, invoices, documentation of the purchase and payment, fulfilment of accounting obligations.

Legal basis for data processing: fulfilment of legal obligations [Section 6 (1) (c) of the GDPR], with regard to Section 159 of the VAT Act and Section 169 (2) of the Accounting Act.

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

Period of data processing:

✓ eight years.

Possible consequences of not providing the information: the guest may not receive a personalised invoice or may not be able to pay.

Data transfers:

1.

- ✓ in case of payment by card, the payer's ID, the amount, date and time of the transaction to Unicredit Bank Zrt. (H-1054 Budapest, Szabadság tér 5-6.).

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

2.

- ✓ Reporting data to NTCA (National Tax and Customs Authority, H-1054 Budapest, Széchenyi u. 2.).

If the data subject is a taxpayer who is a natural person (e.g. self-employed, agricultural farmer), the following data will be reported to NTCA:

- o in the case of an invoice issued to a taxpayer (Section 169 of the VAT Act): the tax identification number of the person acquiring the goods or services under which the supply of goods or services was performed to a taxable person, or the tax identification number under which the intra-Community supply of exempt goods was made to the taxable person, or the first eight digits of the person's tax identification number or, if subject to group-VAT, the group identification number, under which the supply of goods or services was made to a taxable person registered in the territory of Hungary, provided that the supplier of the goods or services is established in Hungary for business purposes or, in the absence of such establishment for business purposes, it has a permanent address or customary place of residence in Hungary; the name and address of the person using the services; the date of issue of the invoice; the serial number of the invoice, which identifies the invoice beyond reasonable doubt; the description of the goods supplied, the identification number used to indicate the goods supplied under the VAT Act, at the option of the person required to issue the invoice, and the quantity thereof, or the description of the service supplied, the description of the service provided, the TESZOR'15 identification number used to indicate the service supplied under the VAT Act, at the option of the person required to issue the invoice, and the quantity thereof, provided that it can be expressed in natural units of measurement; the date of performance, the date of assessment of the tax due in the case of payment of advance where this is different from the date of issue of the invoice; the name, address and tax number of the financial representative where a financial representative is used),
- o in the case of a document subject to the same treatment as an invoice (Section 170 of the VAT Act): the date of issue of the document; the serial number of the document which identifies it beyond doubt; a reference to the invoice the data content of which is modified by the document; the name of the invoice data affected by the modification and the nature of the modification and its quantification.

Data reported to the National Tax and Customs Authority (H-1054 Budapest, Széchenyi u. 2.) in the case of a non-taxable natural person (individual) data subject:

- o in the case of an invoice (Section 169 of the VAT Act):

the date of issue of the invoice; the serial number of the invoice, which identifies the invoice beyond reasonable doubt; the description of the goods supplied, the identification number used to indicate the goods supplied under the VAT Act, at the option of the person required to issue the invoice, and the quantity thereof, or the description of the service supplied, the description of the service provided, the TESZOR'15 identification number used to indicate the service supplied under the VAT Act, at the option of the person required to issue the invoice, and the quantity thereof, provided that it can be expressed in natural units of measurement; the date of performance, the date of assessment of the tax due in the case of payment of advance where this is different from the date of issue of the invoice;

o in the case of a document subject to the same treatment as an invoice (Section 170 of the VAT Act):

the date of issue of the document; the serial number of the document which identifies it beyond doubt; a reference to the invoice the data content of which is modified by the document; the name of the invoice data affected by the modification and the nature of the modification and its quantification.

Legal basis for data transfer: Section 6 (1) (c) of the GDPR], based on paragraphs 1, 2 and 4 of Annex 10 to the VAT Act.



CATERING, SERVICES

2.2. BEER GARDEN, RISTORANTE

Reservations can be made at the catering units of Avalon Park Kft. by phone, at the restaurant or park's e-mail address, at the sales staff or in person.

Booking can also be made on the website <https://book.dinnerbooking.com/hu/hu-HU/book/table/pax/3571/2>, in this case the data controller Dinner Booking ApS (Lyongade 21, 1., 2300 Copenhagen S, Denmark) will transfer the booking data in e-mail. Avalon Park Kft. shall not transmit any data to Dinner Booking ApS.

Bookings are recorded in an Excel spreadsheet and in the hard copy reservation book.

Purpose of data processing: tracking bookings, serving visitors' needs.

Legal basis for data processing: data processing is necessary for the performance of the contract

[Section 6 (1) (b) of the GDPR].

The type of personal data processed: serial number, date and time of booking, name and telephone number of the person making the booking, any special requirements of the guests, and other personal data provided during individual requests and personal consultations.

Period of data processing:

- ✓ booking data will be deleted by Avalon Park one month after the date of booking,
- ✓ five years for data recorded during individual requests and personal consultations.

Possible consequences of not providing the data: table booking is not made for the guest or the individual offer is not prepared.

2.3. EVENTS

Avalon Park Kft. also organises events in its various units. Health services are provided for the events by KH-MEDworks Egészségügyi Oktató, Szolgáltató Kft. (H-3527 Miskolc, Váltó u. 21.).

Purpose of data processing: tracking bookings, managing events, serving visitors', customers' needs.

Legal basis for data processing: data processing is necessary for the performance of the contract

[Section 6 (1) (b) of the GDPR].

The type of personal data processed: serial number, name, mother's name, place and date of birth, address, any special requirements of the guests, and other personal data provided during individual requests and personal consultations.

Period of data processing:

✓ five years.

Possible consequences of not providing the data: the event will not take place.

2.4. MAYA ONLINE TICKETS AND PRODUCTS

Online shopping is possible on the website <https://ticket.avalonpark.hu/>. Shopping is possible with or without registration.

During the purchase process, there is an option to opt-in to direct marketing, i.e. to subscribe to Avalon Park's email newsletter. If you give your consent, we will also process your data in accordance with clause 2.21. of this notice.

Purpose of data processing: shopping on the website of Avalon Park Kft., issuing invoices, fulfilling orders, maintaining contact, completing and documenting purchases and card payments, fulfilling accounting obligations, obtaining consent for newsletter subscriptions.

The legal basis for the data processing: Section 6 (1) (b) of the GDPR, as the processing is necessary for the performance of the contract, and Section 6 (1) (c) of the GDPR with regard to the data of the purchases (date, time, product/service purchased, value of the purchase, billing address, delivery address, method of payment), as the processing is necessary for the performance of a legal obligation on the controller with regard to Section 169 (2) of the Accounting Act.

Scope of the data processed: name, date of the service to be used, type of pass, name of the gift, price of the services, coupon code, surname, first name, e-mail address, telephone number, address, delivery address, company data, consent forms, credit card data, transaction ID, date and time.

Period of data processing:

- ✓ where the user has given direct marketing consent, the data will be retained until the time limit set out in clause 2.21. of this notice,
- ✓ 8 years for the data on purchases in accordance with Section 169 (2) of the Accounting Act,
- ✓ other data generated during the purchase are kept for 5 years in accordance with the general limitation period of the Civil Code.

Data transfer:

- ✓ in the case of card purchases via the SimplePay system, the surname, first name, country, telephone number, e-mail address and purchase data are transferred to OTP Mobil Szolgáltató Kft. (H-1093 Budapest, Közraktár u. 30-32.) as the data processor for the purposes of transaction processing and confirmation, providing customer service assistance to users, user protection and fraud monitoring (fraud detection) in the legitimate interest of the data controllers.

Legal bases of data transfer:

- ✓ Section 6 (1) (b) GDPR, the data processing of data is necessary for the performance of the contract in the case of data transfer to OTP Mobil Szolgáltató Kft.
- ✓ Section 6 (1) (f) GDPR, as Avalon Park Kft. has a legitimate interest in the prevention of fraud in the case of data transmission to OTP Mobil Szolgáltató Kft.

Data processors:

Name	Registered office	Data processor's task
OTP Mobil Szolgáltató Kft.	H-1143 Budapest, Hungária körút 17-19.	processing and confirming transactions, providing customer service assistance to users, fraud-monitoring (fraud detection)
MORGENS Design Kft.	H-8800 Nagykanizsa, Magyar utca 79.	operating the booking system, storage of data

2.5. HELL KART ONLINE BOOKING

Online booking is possible on the website <https://booking.sms-timing.com/hellkart/>, and with the Activity Box mobile application. Booking is also possible without registration. During the booking process, there is an option to opt-in to direct marketing, i.e. to subscribe to Avalon Park's email newsletter. If you give your consent, we will also process your data in accordance with clause 2.21. of this notice.

Purpose of data processing: booking on the website of Avalon Park Kft., issuing invoices, fulfilling orders, maintaining contact, completing and documenting purchases and card payments, fulfilling accounting obligations, obtaining consent for newsletter subscriptions.

The legal basis for the data processing: Section 6 (1) (b) of the GDPR, as the processing is necessary for the performance of the contract, and Section 6 (1) (c) of the GDPR with regard to the data of the purchases (date, time, product/service purchased, value of the purchase, billing address, delivery address, method of payment), as the processing is

necessary for the performance of a legal obligation on the controller with regard to Section 169 (2) of the Accounting Act.

Scope of the data processed: surname, first name, nickname, gender, postal code, city, country, consent forms, telephone number, photo, signature, name, date, type of service to be used, price of the services, coupon code, e-mail address, confirmation code, date and time.

Period of data processing:

- ✓ where the user has given direct marketing consent, the data will be retained until the time limit set out in clause **Error! Reference source not found..** of this notice,
- ✓ 8 years for the data on purchases in accordance with Section 169 (2) of the Accounting Act,
- ✓ other data generated during the purchase are kept for 5 years in accordance with the general limitation period of the Civil Code.

Data transfer:

- ✓ in the case of card purchases via the SimplePay system, the surname, first name, country, telephone number, e-mail address and purchase data are transferred to OTP Mobil Szolgáltató Kft. (H-1093 Budapest, Közraktár u. 30-32.) as the data processor for the purposes of transaction processing and confirmation, providing customer service assistance to users, user protection and fraud monitoring (fraud detection) in the legitimate interest of the data controllers.

Legal bases of data transfer:

- ✓ Section 6 (1) (b) GDPR, the data processing of data is necessary for the performance of the contract in the case of data transfer to OTP Mobil Szolgáltató Kft.
- ✓ Section 6 (1) (f) GDPR, as Avalon Park Kft. has a legitimate interest in the prevention of fraud in the case of data transmission to OTP Mobil Szolgáltató Kft.

Data processors:

Name	Registered office	Data processor's task
OTP Mobil Szolgáltató Kft.	H-1143 Budapest, Hungária körút 17-19.	processing and confirming transactions, providing customer service assistance to users, fraud-monitoring (fraud detection)
MORGENS Design Kft.	H-8800 Nagykanizsa, Magyar utca 79.	operating the booking system, storage of data



ACCOMMODATION DATA PROCESSING

2.6. BOOKING

Reservations for Avalon Resort & Spa can be made on the websites avalonpark.hu and avalonresort.hu, by e-mail, in person, by phone and through partner portals. Avalon Park Kft. stores the booking data in an electronic form in its administration system. Documents containing personal data generated on paper will be retained in parallel with the electronic system until the dates indicated in the relevant part of this notice.

The name and e-mail address of those who give their consent to be contacted for direct marketing purposes during the booking process will be included in the Avalon Resort newsletter database, as described in chapter 2.22 of this notice.

Anonymous analyses are carried out on the basis of the data provided.

Purpose of data processing: booking accommodation, registering and identifying guests, pre-ordering services for guests who booked, maintaining contact, analysing habits, fixing bookings.

Legal basis for data processing: data processing is necessary for the performance of the contract

[Section 6 (1) (b) of the GDPR].

Type of the personal data processed: identification number, date of arrival and departure, number and type of rooms booked, number of adults and children using the service, age of children, additional services requested, name, company details if any, address, telephone number, e-mail address, other personal data provided in the “message to the accommodation” field, consent to direct marketing enquiries, method of payment, name of cardholder in case of payment by card, card type, number, expiry date and CVC number,

SZÉP card number, expiry date, SZÉP card holder's telephone number, unique booking reference, reason for cancellation in case of cancellation.

Period of data processing:

- ✓ five years,
- ✓ data of reservations cancelled without payment obligation are deleted by the data controller immediately after cancellation.

Possible consequences of not providing the data: the guest cannot book accommodation or other services in advance.

Data processing in the course of the performance of the payment obligation in connection with the booking is governed by the provisions of chapter 2.1. of this information notice.

Data processor:

Name	Registered office	Data processor's task
NetHotelBooking Kft.	H-8200 Veszprém, Boksza tér 1/A.	providing the RESnWEB online booking engine
HostWare Kft.	H-1149 Budapest, Róna utca 120.	storage of data

Data transfer:

- ✓ in case of online payment by card, the cardholder's name, card type, card number, expiry date and CVC number, SZÉP card number, expiry date, SZÉP card holder's phone number and unique booking identifier are transferred to BIG FISH Payment Services Kft. (H-1066 Budapest, Nyugati tér 1-2.) for the purposes of transaction processing and confirmation, providing customer service assistance to users, user protection and fraud monitoring (fraud detection) in the legitimate interest of the data controllers.

Legal bases of data transfer:

- ✓ Section 6 (1) (b) GDPR, the data processing of data is necessary for the performance of the contract in the case of data transfer to BIG FISH Payment Services Kft.
- ✓ Section 6 (1) (f) GDPR, as Avalon Park Kft. has a legitimate interest in the prevention of fraud in the case of data transmission to BIG FISH Payment Services Kft.

Data processors:

Name	Registered office	Data processor's task
BIG FISH Payment Services Kft.	H-1066 Budapest, Nyugati tér 1-2.	processing and confirming transactions, providing customer service assistance to users, fraud-monitoring (fraud detection)

2.7. CHECKING IN

Avalon Park Kft. shall process personal data during the hotel check in process, and some personal data are processed electronically in its administration system for its own business purposes. Documents containing personal data generated on paper will be retained in parallel with the electronic system until the dates indicated in the relevant part of this notice.

The name and e-mail address of those who give their consent to be contacted for direct marketing purposes during the check in process will be included in the Avalon Resort newsletter database, as described in chapter 2.22 of this notice.

Purpose of data processing: providing accommodation services, registering and identifying hotel guests, providing services to hotel guests, maintaining contact, managing and fulfilling bookings, payment, performing obligations related to accounting, tourism tax declaration and provided for by Section 9/H of the Tourism Act and Section 73 (2) of the Third-country Nationals Act.

Legal basis for data processing: data processing is necessary for the performance of the contract

[Section 6 (1) (b) of the GDPR], but it is also necessary to fulfil statutory obligations [Section 6 (1) (c) of the GDPR], as Section 30 (1) (a) of the Local Taxes Act, Section 9/H of the Tourism Act, and Section 73 (2) of the Third-country Nationals Act require the processing of data, and Section 169 (2) of the Accounting Act requires the storage of these data.

Type of personal data processed: room number, name, date of birth, address, nationality, car registration number, date of arrival and departure, date of completion, signature, consent to direct marketing enquiries, data on any employer's certificate, car registration number, data relating to the use of hotel services, payment data (date, time, name of the items on the invoice, amount, SZÉP card data).

Period of data processing:

- ✓ eight years in accordance with Section 169 (2) of the Accounting Act.

Possible consequences of not providing the data: the guest cannot use the accommodation.

Data transfer:

- ✓ the personal data of the guests who check in will be transferred to the Hungarian Tourism Agency (H-1027 Budapest, Kacska u. 15-23.).

Type of personal data transferred: name, name at birth, date and place of birth, gender, nationality, mother's name, identification data of the identity document or travel document, visa or residence permit number, date and place of entry in the case of third-country nationals, address of the accommodation service, start and expected end date of the accommodation.

Legal basis for data transfer: fulfilment of a legal obligation [Section 6 (1) (c) of the GDPR], in view of Section 9/H of the Tourism Act.

Avalon Park Kft. will also record image data of the document suitable for identity verification, but the software used deletes the image data of the document immediately after the above data is recorded.

Data processing in the course of the performance of the payment obligation resulting from using the service is governed by the provisions of chapter 2.1. of this information notice.

Data processor:

Name	Registered office	Data processor's task
NetHotelBooking Kft.	H-8200 Veszprém, Boksza tér 1/A.	providing the RESnWEB online booking engine

2.8. GIFT VOUCHERS

Avalon Park Kft. registers gift vouchers issued without personalisation together with the name of the purchaser.

Purpose of data processing: certifying the issue of gift vouchers.

Legal basis for data processing: data processing is necessary for the performance of the contract

[Section 6 (1) (b) of the GDPR].

Type of personal data processed: serial number, value of the voucher, name.

Period of data processing:

✓ five years.

Possible consequences of not providing the data: the data subject cannot buy a gift voucher.

2.9. OTHER

Avalon Park Kft. will not log the use of televisions in hotel rooms.

The dry cleaning service is provided by an external laundry, to which Avalon Park does not transfer any personal data, identification is by room number.

In the case of using other external services (ordering a taxi, flowers, etc.), Avalon Park shall not transfer personal data to any external data controller.

OTHER DATA PROCESSING BY THE PARK

2.10. CONSUMER COMPLAINTS REGISTRY

Consumer complaints registries have been placed in several units of Avalon Park Kft.

Purpose of data processing: processing of comments regarding the services provided by the units of Avalon Park Kft.

Legal basis for data processing: fulfilment of a legal obligation [Section 6 (1) (c) of the GDPR], with regard to Section 17/A (5) of the Consumer Protection Act and Section 5 (4) of the Commerce Act.

Type of personal data processed: personal data provided in the course of entries made in the consumer complaints register.

Period of data processing:

- ✓ duplicates of entries made in the consumer complaints register are removed immediately after the entry and retained locked for three years in accordance with the sequential numbering system, and replies to them are also retained for three years.

Possible consequences of not providing the data: the data subject cannot exercise his/her consumer rights or Avalon Park Kft. cannot provide a personalised response to the customer who has written the entry.

2.11. GUEST BOOK

Guest books have been placed in several units of Avalon Park Kft. where guests and visitors may write their comments and share their experiences. Guest books are public and freely available to all visitors to the territory of Avalon Park.

Purpose of data processing: recording comments regarding the services provided by Avalon Park.

Legal basis for data processing: voluntary consent of the data subject [Section 6 (1) (a) of the GDPR].

Type of personal data processed: personal data provided in the guest books.

Period of data processing:

one hundred years.

Possible consequences of not providing the data: the personal comments of the guest will not be recorded.

2.12. OBJECTS LOST AND FOUND

Purpose of data processing: to keep a record of objects found on the territory of Avalon Park Kft., to notify the owner or the finder.

Legal basis for data processing: fulfilment of a legal obligation [Section 6 (1) (c) of the GDPR], in view of Section 5:54 to 55 of the Civil Code.

Type of personal data processed: date and time of the find, the identity of the finder, the name of the object found, whether the owner was notified, the place of storage, the signature of the finder and, in the case of handover, the signature of the recipient.

Period of data processing:

- ✓ the data will be deleted or destroyed after the owner takes possession of the found object or, in the case of handover to the municipal notary, after the handover, or after one year from the date of its discovery in the case of sale.

The possible consequences of not providing the data: the data controller will not be able to comply with its legal obligations, or the owner of the object will not be able to contact the finder.

2.13. WI-FI SERVICE

Avalon Park Kft. provides internet access for guests and visitors via Wi-Fi¹ connection using the services of Twin Cable Kft. (H-3533 Miskolc, Sás u. 35).

Wi-Fi traffic and data about the connected device are not recorded by Avalon Park Kft.

2.14. PHOTO TERMINAL

Photos can be taken with a terminal placed in the park and sent to the e-mail address provided by the guest.

Purpose of data processing: taking a photo with the terminal and sending it by e-mail.

Legal basis for data processing: voluntary consent of the data subject [Section 6 (1) (a) of the GDPR].

Type of the personal data processed: identification number, date, time, facial image and other personal data of the data subjects recorded in a photograph, as well as the recipient's e-mail address and other personal data provided in the message.

Period of data processing:

- ✓ all data will be deleted immediately after the photo is sent.

Possible consequences of not providing the data: the data subject cannot use the photo terminal service.

¹ Wi-Fi: networking standard for wireless Internet communication. Computing devices and mobile phones with a Wi-Fi network card can connect wirelessly to the Internet.



AVALONPARK.HU

2.15. LOGGING OF THE AVALONPARK.HU SERVER

When visiting the website www.avalonpark.hu, the web server will automatically log the user's activity.

Purpose of the data processing: during the visit of the website, the service provider records the visitor's data in order to check the operation of the services, to prevent abuse.

Legal basis for data processing: legitimate interest of the controller [Section 6 (1) (f) of the GDPR], as the controller has a legitimate interest in identifying users, tracing errors and preventing abuse.

Type of the personal data processed: identification number, date and time of the visit, address of the page visited, server response status code, response size, address of the page previously visited, IP address of the user's computer², type of operating system and browser, encryption protocol used.

Period of data processing:

- ✓ thirty days.

Right to objection:

- ✓ The data subject has the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation. In this

² IP address: a sequence of numbers that uniquely identifies the devices of users accessing the network.

case, the controller may no longer process the personal data, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Data processors:

Name	Registered office	Data processor's task
Creative Management Kft.	H-8200 Veszprém, Boksza tér 1/A.	providing online hosting
Google LLC	1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America	providing online, cloud hosting in the EU

Logging-related data processing by external service providers:

The html code of the portal contains links, including tracking pixels, embedded in the website, pointing to an external server, independent of the data controller. In this case the user's device is also connected directly to the external service provider's server. Please note that the providers of these links are able to collect user data (e.g. IP address, browser, operating system data, mouse pointer movement, address of the page visited and time of visit) and to place a cookie on the user's device due to direct communication with the user's browser.

Any content that may be personalised for the user is provided by the servers of external service providers.

When visiting the site, the user's device may be connected to the following service providers. Details of the data processing by each service provider can be found in the following information notices:

Name of service provider	Function implemented by the service provider	Access to the service provider's privacy notice
Google	Running the advertising services of Google Ads and DoubleClick, thereby displaying personalised ads on Google's advertising network.	https://policies.google.com/privacy?hl=hu
Google	Providing statistical, web analytics analysis using Google Analytics.	https://policies.google.com/privacy?hl=hu
Google	Operating Google's YouTube service.	https://policies.google.com/privacy?hl=hu
Meta (Facebook)	Displaying personalised ads on Facebook.	https://www.facebook.com/privacy/guide/collection/
OptiMonk	Increase the achievement of website marketing objectives.	https://www.optimonk.hu/adatvedelmi-nyilatkozat/
Bing	Optimisation with the Microsoft Bing search service.	https://privacy.microsoft.com/hu-hu/privacystatement
Clarity	Use Microsoft's Clarity service to check the validity of the website and user habits.	https://privacy.microsoft.com/hu-hu/privacystatement

The website is connected directly to the servers of the partners listed in the table in order to track users, display personalised recommendations, perform analytical measurements, remarketing, dynamic retargeting service, display a catalogue and the search service on the site.

Remarketing, dynamic retargeting service providers use cookies to display ads to users based on their previous visits to a website or app. When visiting the avalonpark.hu website, visitors have the option to give their consent to the use of cookies set by these service providers or to manage their consent preferences by clicking on “Settings”.

If users use the Google Analytics browser add-on (<https://tools.google.com/dlpage/gaoptout/>), their data will not be used by Google Analytics.

Visitors to the website avalonpark.hu may disable the use of Google cookies or device identifiers on the website <https://adssettings.google.com/authenticated>, or the unsubscribe site of Network Advertising Initiative (<http://optout.networkadvertising.org>) they may also disable cookies from other external service providers, or the users may regulate the use of device identifiers in their device settings (<https://support.google.com/ads/answer/1660762#mob>).

Data processor:

Name	Registered office	Data processor's task
Creative Management Kft.	H-8200 Veszprém, Boksza tér 1/A.	providing online hosting

2.16. HANDLING THE AVALONPARK.HU COOKIE

The service provider places a small data package, a so-called cookie, on the user's computer in order to provide a personalised service. A cookie is a variable alphanumeric packet of information sent by a web server, which is stored on the user's computer for a predetermined period of time. The use of cookies provides the possibility to retrieve certain data of the visitor and to track his/her internet usage. Cookies can therefore be used to precisely determine the interests, internet usage habits and website visit history of the user data subject. Since cookies act as a kind of tag that allows the website to recognise a visitor returning to the site, they can also be used to store the username and password that is valid on that page. If, during a visit to a website, the user's browser returns a cookie previously saved on the user's device, the sending service provider can link the current visit to the previous one, but since cookies are domain-bound, it can only do so for its own content. Cookies are not in themselves capable of identifying the user, they are only capable of recognising the visitor's computer or device, from which the user's activity can be inferred.


Cookies are partly downloaded from own server and partly from the server of partner service providers, so-called third-party cookies. The third-party server is then connected directly to the user's computer.

Purpose of the data processing: to identify and distinguish users, to identify users' current session, to store the data provided during the session, to prevent data loss, to identify us-

ers and, with their specific consent, to fulfil the statistical and marketing purposes set out below.

Legal basis of data processing: With regard to functions, we distinguish between **cookies that are essential for the operation of the website**, the legal basis for the placement of which is Section 6 (1) (f) of the GDPR, as Avalon Park Kft. has a legitimate interest in the operation of the website, to ensure the functionality and essential functions of the website and the security of the computer system. The legal basis for the processing of cookies that are not essential for the operation of the service is Section 6 (1) (a) of the GDPR, the consent of the data subject. These cookies may be used for **statistical purposes** (to collect technical data not necessary for the current operation, for future development of the service or to measure the number of visitors, etc.) and for **marketing purposes** (tracking, advertising, etc.).

Please note that accepting cookies may also result in your cookie data being processed outside the European Union or the European Economic Area. In some countries, this may entail the risk that data may be accessed for security and surveillance purposes without you being informed or having any other legal right to access it. Furthermore, we are also unable to ensure that you may exercise your rights against the service providers concerned. The legal basis for the transfer of data to any unsafe third country is Section 49 (1) (a) of the GDPR.

You can find information on the management of individual cookies by clicking on the  icon at the bottom left of each website, where you can also manage and withdraw your consent to cookies.

Data processor:

Name	Registered office	Data processor's task
Creative Management Kft.	H-8200 Veszprém, Boksza tér 1/A.	providing online hosting

A cookie that is valid until the session is closed will remain on the computer only until the browser is closed. (Persistent) cookies with an exact expiry date are stored on the computer until they are deleted or until their expiry date at the latest.

You may delete the cookie from your computer or disable the use of cookies in your browser. Cookies can be usually managed in the Tools/Preferences menu of the browsers under Privacy/Preferences/Custom settings, under the menu item cookie or tracking.

More information about cookies is available at: <http://www.adatvedelmiszakerto.hu/cookie>



AVALONRESORT.HU

2.17. LOGGING OF THE AVALONRESORT.HU SERVER

When visiting the website www.avalonresort.hu, the web server will automatically log the user's activity.

Purpose of the data processing: during the visit of the website, the service provider records the visitor's data in order to check the operation of the services, to prevent abuse.

Legal basis for data processing: legitimate interest of the controller [Section 6 (1) (f) of the GDPR], as the controller has a legitimate interest in identifying users, tracing errors and preventing abuse.

Type of the personal data processed: identification number, date and time of the visit, address of the page visited, server response status code, response size, address of the page previously visited, IP address of the user's computer³, type of operating system and browser, encryption protocol used.

Period of data processing:

- ✓ thirty days.

Right to objection:

- ✓ The data subject has the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation. In this

³ IP address: a sequence of numbers that uniquely identifies the devices of users accessing the network.

case, the controller may no longer process the personal data, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Data processors:

Name	Registered office	Data processor's task
Creative Management Kft.	H-8200 Veszprém, Boksza tér 1/A.	providing online hosting
Google LLC	1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America	providing online, cloud hosting in the EU

Logging-related data processing by external service providers:

The html code of the portal contains links, including tracking pixels, embedded in the website, pointing to an external server, independent of the data controller. In this case the user's device is also connected directly to the external service provider's server. Please note that the providers of these links are able to collect user data (e.g. IP address, browser, operating system data, mouse pointer movement, address of the page visited and time of visit) and to place a cookie on the user's device due to direct communication with the user's browser.

Any content that may be personalised for the user is provided by the servers of external service providers.

When visiting the site, the user's device may be connected to the following service providers. Details of the data processing by each service provider can be found in the following information notices:

Name of service provider	Function implemented by the service provider	Access to the service provider's privacy notice
Google	Running the advertising services of Google Ads and DoubleClick, thereby displaying personalised ads on Google's advertising network.	https://policies.google.com/privacy?hl=hu
Google	Providing statistical, web analytics analysis using Google Analytics.	https://policies.google.com/privacy?hl=hu
Google	Operating Google's YouTube service.	https://policies.google.com/privacy?hl=hu
Meta (Facebook)	Displaying personalised ads on Facebook.	https://www.facebook.com/privacy/guide/collection/
OptiMonk	Increase the achievement of website marketing objectives.	https://www.optimonk.hu/adatvedelmi-nyilatkozat/
Bing	Optimisation with the Microsoft Bing search service.	https://privacy.microsoft.com/hu-hu/privacystatement
Clarity	Use Microsoft's Clarity service to check the validity of the website and user habits.	https://privacy.microsoft.com/hu-hu/privacystatement

The website is connected directly to the servers of the partners listed in the table in order to track users, display personalised recommendations, perform analytical measurements, remarketing, dynamic retargeting service, display a catalogue and the search service on the site.

Remarketing, dynamic retargeting service providers use cookies to display ads to users based on their previous visits to a website or app. When visiting the avalonpark.hu website, visitors have the option to give their consent to the use of cookies set by these service providers or to manage their consent preferences by clicking on “Settings”.

If users use the Google Analytics browser add-on (<https://tools.google.com/dlpage/gaoptout/>), their data will not be used by Google Analytics.

Visitors to the website avalonresort.hu may disable the use of Google cookies or device identifiers on the website <https://adssettings.google.com/authenticated>, or the unsubscribe site of Network Advertising Initiative (<http://optout.networkadvertising.org>) they may also disable cookies from other external service providers, or the users may regulate the use of device identifiers in their device settings (<https://support.google.com/ads/answer/1660762#mob>).

Data processor:

Name	Registered office	Data processor's task
Creative Management Kft.	H-8200 Veszprém, Boksza tér 1/A.	providing online hosting

2.18. HANDLING THE AVALONRESORT.HU COOKIE

The service provider places a small data package, a so-called cookie, on the user's computer in order to provide a personalised service. A cookie is a variable alphanumeric packet of information sent by a web server, which is stored on the user's computer for a predetermined period of time. The use of cookies provides the possibility to retrieve certain data of the visitor and to track his/her internet usage. Cookies can therefore be used to precisely determine the interests, internet usage habits and website visit history of the user data subject. Since cookies act as a kind of tag that allows the website to recognise a visitor returning to the site, they can also be used to store the username and password that is valid on that page. If, during a visit to a website, the user's browser returns a cookie previously saved on the user's device, the sending service provider can link the current visit to the previous one, but since cookies are domain-bound, it can only do so for its own content. Cookies are not in themselves capable of identifying the user, they are only capable of recognising the visitor's computer or device, from which the user's activity can be inferred.


Cookies are partly downloaded from own server and partly from the server of partner service providers, so-called third-party cookies. The third-party server is then connected directly to the user's computer.

Purpose of the data processing: to identify and distinguish users, to identify users' current session, to store the data provided during the session, to prevent data loss, to identify us-

ers and, with their specific consent, to fulfil the statistical and marketing purposes set out below.

Legal basis of data processing: With regard to functions, we distinguish between **cookies that are essential for the operation of the website**, the legal basis for the placement of which is Section 6 (1) (f) of the GDPR, as Avalon Park Kft. has a legitimate interest in the operation of the website, to ensure the functionality and essential functions of the website and the security of the computer system. The legal basis for the processing of cookies that are not essential for the operation of the service is Section 6 (1) (a) of the GDPR, the consent of the data subject. These cookies may be used for **statistical purposes** (to collect technical data not necessary for the current operation, for future development of the service or to measure the number of visitors, etc.) and for **marketing purposes** (tracking, advertising, etc.).

Please note that accepting cookies may also result in your cookie data being processed outside the European Union or the European Economic Area. In some countries, this may entail the risk that data may be accessed for security and surveillance purposes without you being informed or having any other legal right to access it. Furthermore, we are also unable to ensure that you may exercise your rights against the service providers concerned. The legal basis for the transfer of data to any unsafe third country is Section 49 (1) (a) of the GDPR.

You can find information on the management of individual cookies by clicking on the  icon at the bottom left of each website, where you can also manage and withdraw your consent to cookies.

Data processor:

Name	Registered office	Data processor's task
Creative Management Kft.	H-8200 Veszprém, Boksza tér 1/A.	providing online hosting

A cookie that is valid until the session is closed will remain on the computer only until the browser is closed. (Persistent) cookies with an exact expiry date are stored on the computer until they are deleted or until their expiry date at the latest.

You may delete the cookie from your computer or disable the use of cookies in your browser. Cookies can be usually managed in the Tools/Preferences menu of the browsers under Privacy/Preferences/Custom settings, under the menu item cookie or tracking.

More information about cookies is available at: <http://www.adatvedelmiszakerto.hu/cookie>



MARKETING

With regard to data processing in the course of other prize games of Avalon Park Kft. not covered by this information notice, the rules and data processing information of the games concerned shall apply.

If the participant gives his/her consent to the sending of advertising messages in the course of the prize draw, the provisions of clause 2.21. and 2.22. of this information notice shall apply to this data processing.

2.19. SOCIAL MEDIA SITES OF AVALON PARK KFT.

Avalon Park, Avalon Resort, HELL Kart & Event Center are present on several social media portals, where they will publish content and display advertisements. Avalon Park Kft. is present on the following social media sites:

Facebook and Messenger contact:

<https://www.facebook.com/avalonparkhungary>

<https://www.facebook.com/avalonresortandspa>

<https://www.facebook.com/hellkart>

<https://www.facebook.com/avalonristorante>

<https://www.facebook.com/theclubavalon>

Instagram sites:

https://www.instagram.com/avalon_park_hu/

https://www.instagram.com/avalon_resort_spa/

<https://www.instagram.com/hellkarteventcenter/>

https://www.instagram.com/avalon_ristorante_hu/

https://www.instagram.com/the_club_avalon/

TikTok sites:

https://www.tiktok.com/@avalon_park

https://www.tiktok.com/@hell_kart

Pinterest site:

https://hu.pinterest.com/avalon_park/

<https://hu.pinterest.com/avalonresort/>

Given the fact that the operation of these sites is of common interest with the service providers operating the sites, Avalon Park Kft. has joint data processing – separately for each service – with the following companies:

Data processing for **Facebook**, **Messenger** and **Instagram** is shared with Meta Platforms Ireland Ltd. (Serpentine Avenue, Block J, Dublin 4, Ireland). Access to the joint data processing contract: https://www.facebook.com/legal/terms/page_controller_addendum

The detailed privacy notice for Facebook and Messenger is available at <https://hu-hu.facebook.com/business/gdpr>. Access to Instagram's privacy notice: <https://privacycenter.instagram.com>.

For **TikTok**, joint data processing exists with the following organisations: TikTok Information Technologies UK Ltd. (6th Floor, One London Wall, London, EC2Y 5EB, United Kingdom) and TikTok Technology Ltd. (10 Earlsfort Terrace, Dublin, D02 T380, Ireland). Access to TikTok's privacy notice: <https://www.tiktok.com/legal/page/eea/privacy-policy/hu-HU>. The TikTok joint data processing agreement is available at <https://ads.tiktok.com/i18n/official/policy/jurisdiction-specific-terms>, the essence of which is that decisions on the processing of personal data as set out in the TikTok privacy notice are taken jointly by the parties, and the tasks for their implementation are shared. The claims related to the exercise of the data subject's rights are mainly served by TikTok and TikTok is in contact with the data subject, but its data controller partner may also play a role in solving the task, or the data subject may assert his or her rights with any data controller.

With regard to the **Pinterest** site, joint data processing by Pinterest Inc. (651 Brannan Street, San Francisco, CA 94107, USA) and Avalon Park Kft. Access to Pinterest's privacy notice: <https://policy.pinterest.com/en/privacy-policy>

Detailed information on the data processing for each service can be found on the links above, which are continuously updated by the service providers as their services are developed.

Purpose of the data processing: moderating and replying to visitors' comments, posts, messages (Messenger).

Legal basis for data processing: Section 6 (1) (a) of the GDPR, consent of the data subject.

Scope of the data processed: the profile name of the person who made the comment, post, message, other personal data contained in the message, post, comment.

Period of data processing:

- ✓ In the case of comments or posts, until the data subject's consent is withdrawn by deleting the comment or post;
- ✓ 5 years for messages.

Data processor:

Name	Registered office	Data processor's task
Magnify Creative Solutions Kft.	H-2100 Gödöllő, Méhész köz 5.	Reply to comments, posts, messages on HELL Kart's Facebook and Instagram.
Morgens Design Kft.	H-8800 Nagykanizsa, Magyar utca 79.	Reply to comments, posts, messages on Avalon Resort & SPA's Facebook and Instagram.
XXX	XXX	Reply to comments, posts, messages on Avalon Ristorante's and The Club's Facebook and Instagram.

Possible consequences of not providing the data: the user will not be able to post comments or opinions on the relevant Avalon Park-related social media platform.

2.20. PRIZE DRAW ON FACEBOOK

Avalon Park Kft. organises and operates a prize draw at <https://www.facebook.com/avalonresortandspa>.

The name and e-mail address of those who give their consent to be contacted for direct marketing purposes during the prize draw registration will be included in the Avalon Resort newsletter database, as described in chapter 2.22 of this notice.

Purpose of data processing: participation in the prize draw organised by Avalon Park Kft. at <https://www.facebook.com/avalonresortandspa>, drawing of winners, notification, publication, fulfilment of accounting obligations, obtaining consent to send newsletters, contact management.

Legal basis for data processing: the voluntary consent of the data subject [Section 6 (1) (a) of the GDPR], and the fulfilment of the accounting obligation in relation to the winners' receipt of the prizes [Section 6 (1) (c) of the GDPR], with regard to Section 169 (2) of the Accounting Act.

Type of the personal data processed: identification number, name, e-mail address, consent to direct marketing enquiries, address on the acknowledgement of receipt, mother's name, name of the prize, other personal data provided in the comment, date, signature.

Deadline for the erasure of data:

- ✓ until the user's consent is withdrawn, but not later than
- ✓ where the user has given direct marketing consent, the data will be retained until the time limit set out in clause 2.22. of this notice,
- ✓ the data of players who apply for testing but are not selected will be deleted immediately after selection.

Possible consequences of not providing the data: the data subject is not eligible to participate in the prize draws of Avalon Park Kft.

Publication:

- ✓ the names of the winners at the website
<https://www.facebook.com/avalonresortandspa>.

Legal basis for publication: voluntary consent of the data subject [Section 6 (1) (a) of the GDPR].

2.21. AVALON PARK NEWSLETTER

Subscription to the Avalon Park Kft. newsletter is available from HELL Kart registration on avalonpark.hu. The system also uses data generated from website visits and bookings.

Avalon Park Kft. analyses the data and user habits of newsletter subscribers in order to be able to tailor its advertising to users at the contact details they provide, on the avalonpark.hu and avalonresort.hu websites and on the websites of its partners.

Segmented collection of data for marketing purposes constitutes profiling within the meaning of Section 4 (4) of the GDPR.

The logic used during profiling: based on the information voluntarily provided by users, and based on the browsing and click-through data measured by systems on the website and in emails, we are able to send targeted content to consumers.

Impact of profiling on the data subject: sending personalised marketing messages based on the activities of the data subjects.

Purpose of the data processing: sending e-mail newsletters containing commercial advertising to interested parties, displaying personalized marketing messages on own and partner interfaces, making personalized offers based on user behavior (e.g. opens, clicks), sending the data controller's own and its partners' business offers.

Legal basis for data processing: voluntary consent of the data subject [Section 6 (1) (a) of the GDPR].

Types of the personal data processed: ID number, date, time, email address, name, scope of interests, gender, language, birthday, name day, booking details, purchase details, what offer is the data subject interested in, current coupon code, what is the source (e.g. website, Facebook) of it, how active the user is, consent to direct marketing enquiries, and analytical data relating to website visits, newsletter subscriptions and unsubscriptions, sending, delivery and opening of messages (e.g. date and time of events, computer IP address, reason for non-delivery).

Period of data processing:

- ✓ 24 hours for newsletter subscriptions without user confirmation, otherwise,

- ✓ until the user's consent is withdrawn, but not later than
- ✓ 24 months from the date of the user's last newsletter opening, data update,
- ✓ three months for the addressees of undeliverable newsletters.

Possible consequences of not providing the data: the data subject is not informed of offers from the data controller and its partners.

To withdraw consent to receive direct marketing messages and to request the deletion or modification of personal data, please contact:

- ✓ via e-mail to leiratkozas@avalonpark.hu, and
- ✓ by mail to the address Avalon Park Kft. H-1062 Budapest, Andrásy út 126.

Data processor:

Name	Registered office	Data processor's task
Online Marketing Stratégia Kft.	H-1039 Budapest, Püskösdfürdő utca 52-54.	management of e-mail newsletter campaigns
ActiveCampaign, LLC	1 North Dearborn Street, 5th floor Chicago, IL 60602, United States of America a member of the EU-US Privacy Shield Framework	operation of the e-mail newsletter system

2.22. AVALON RESORT NEWSLETTER

Subscription to Avalonresort's newsletter is available during the booking and check-in process (chapters 2.6. and 2.7. of this information) and on the avalonresort.hu website. The system also uses data generated from website visits and bookings.

Avalon Park Kft. analyses the data and user habits of newsletter subscribers in order to be able to tailor its advertising to users at the contact details they provide, on the avalonpark.hu and avalonresort.hu websites and on the websites of its partners.

Segmented collection of data for marketing purposes constitutes profiling within the meaning of Section 4 (4) of the GDPR.

The logic used during profiling: based on the information voluntarily provided by users, and based on the browsing and click-through data measured by systems on the website and in emails, we are able to send targeted content to consumers.

Impact of profiling on the data subject: sending personalised marketing messages based on the activities of the data subjects.

Purpose of the data processing: sending e-mail newsletters containing commercial advertising to interested parties, displaying personalized marketing messages on own and partner interfaces, making personalized offers based on user behavior (e.g. opens, clicks), sending the data controller's own and its partners' business offers.

Legal basis for data processing: voluntary consent of the data subject [Section 6 (1) (a) of the GDPR].

Types of the personal data processed: ID number, date, time, email address, name, scope of interests, gender, language, birthday, name day, booking details, purchase details, what offer is the data subject interested in, current coupon code, what is the source (e.g. website, Facebook) of it, how active the user is, consent to direct marketing enquiries, and analytical data relating to website visits, newsletter subscriptions and unsubscriptions, sending, delivery and opening of messages (e.g. date and time of events, computer IP address, reason for non-delivery).

Period of data processing:

- ✓ 24 hours for newsletter subscriptions without user confirmation, otherwise,
- ✓ until the user's consent is withdrawn, but not later than
- ✓ 24 months from the date of the user's last newsletter opening, data update,
- ✓ three months for the addressees of undeliverable newsletters.

Possible consequences of not providing the data: the data subject is not informed of offers from the data controller and its partners.

To withdraw consent to receive direct marketing messages and to request the deletion or modification of personal data, please contact:

- ✓ via e-mail to leiratkozas@avalonpark.hu, and
- ✓ by mail to the address Avalon Park Kft. H-1062 Budapest, Andrásy út 126.

Data processors:

Name	Registered office	Data processor's task
Online Marketing Stratégia Kft.	H-1039 Budapest, Püskösdfürdő utca 52-54.	management of e-mail newsletter campaigns
ActiveCampaign, LLC	1 North Dearborn Street, 5th floor Chicago, IL 60602, United States of America a member of the EU-US Privacy Shield Framework	operation of the e-mail newsletter system

2.23. TAKING AND USING PHOTOS AND FILM FOOTAGE

Photos and film footage published on the electronic and print marketing materials, websites and social media portals of Avalon Park Kft. show its employees, visitors and guests.

Purpose of data processing: to promote and advertise Avalon Park Kft.

Legal basis for data processing: voluntary consent of the data subject [Section 6 (1) (a) of the GDPR].

Type of the personal data processed: images of the persons in the recordings visible on the photos and in film footage, the voice of the persons in the film footage and other personal data recorded.

Period of data processing:

- ✓ ten years.

Possible consequences of not providing the data: no photo or film footage is taken.

Publication:

- ✓ the recordings made are published on the electronic and print marketing materials, websites and social media sites of Avalon Park Kft. described in chapter 2.19. of this notice.

Legal basis for publication: voluntary consent of the data subject.

Data processors:

Name	Registered office	Data processor's task
LENGYEL Zsolt sole entrepreneur	H-3529 Miskolc, Aulich Lajos u. 14/2	taking photos and film footage
ROGOSZ Péter sole entrepreneur	H-3519 Miskolc, Lilaakác u. 9.	taking photos and film footage



PROPERTY PROTECTION

2.24. ELECTRONIC SURVEILLANCE SYSTEM

Avalon Park Kft. operates in its territory an electronic surveillance and recording system, which includes infra-red cameras that produce dark-sensitive images, directed at the entrances and exits, the reception, the underground car park; the go-kart track, the go-kart terrace and service area, the lobby; cash handling areas, the restaurant and its terrace, the beer garden, the conference room, the storage rooms, the mechanical room, the pool area and traffic areas. Further information on the exact location of the cameras and the areas monitored can be found in the information leaflets posted at the entry points.

ZEMPLÉN-SEC Kft. (H-1222 Budapest, Nagytétényi út 190/B.), as data processor, provides live guard service in the Avalon Park area.

Purpose of the data processing: to protect human life, physical integrity, property and cash of significant value, to identify unauthorised persons entering the premises of Avalon Park Kft., to record the fact of entry, to document the activities of unauthorised persons, to investigate the circumstances of any accidents at work and other accidents.

Legal basis for data processing: the legitimate interest of the controller [Section 6 (1) (f) of the GDPR], as Avalon Park Kft. has a legitimate interest in the protection of persons and property.

Type of the personal data processed: images of the persons entering the territory of Avalon Park Kft., visible on the image recording and other personal data recorded by the surveillance system.

Period of data processing:

- ✓ three days.

Information related to data storage: recordings are stored on servers located in the Avalon Park area under enhanced data security measures to ensure that they cannot be viewed or copied by unauthorised persons.

Persons entitled to view the actual camera screens: only the designated employees of Avalon Park Kft. and the company providing live guard service in the park, in order to achieve the data processing purposes specified in this information notice.

Persons entitled to view the recordings: only the designated employee of Avalon Park Kft., in order to achieve the data processing purposes specified in this information notice.

Persons entitled to copy the recordings to any data carrier: only the designated employee of Avalon Park Kft., in order to achieve the data processing purposes specified in this information notice.

Logging: access to the recorded data and its copying to a data carrier is recorded by Avalon Park Kft. in a protocol with the name of the person who made the access, the reason for access and the time of access.

Recordings stored in the camera surveillance and recording system operated by Avalon Park Kft. may only be viewed by authorized persons for the purpose of taking evidence of breaches of the law against human life, bodily integrity and property, and identifying the perpetrator.

Data transfer:

- ✓ recordings made by the camera system and containing relevant information for the authorities or courts in the event of offences or criminal proceedings.

Legal basis for data transfer: the legal obligation on the data controller [Section 6 (1) (c) of the GDPR], having regard to the following legislation: Sections 261 (1), 308 (2) (a), and 376 (2) and (3) of the Criminal Procedure Act, and Aections 75 (1) (a) and 78 (3) of the Offences Act.

Data processor:

Name	Registered office	Data processor's task
ZEMPLÉN-SEC Kft.	H-1222 Budapest, Nagytétényi út 190/B.	providing property protection tasks
Quali-Top Kft.	H-3508 Miskolc, Haladás u. 1/a.	operation and maintenance of an electronic monitoring and recording system

Right to objection:

- ✓ The data subject has the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation. In this case, the controller may no longer process the personal data, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2.25. ROOM CARDS

Avalon Park hotel guests use room cards to unlock their accommodation.

Purpose of the data processing: to authorise hotel guests to use their own accommodation, to prevent unauthorised access to rooms and to control any abuse.

Legal basis for data processing: the legitimate interest of the controller [Section 6 (1) (f) of the GDPR], as the controller has a legitimate interest in protecting its guests and its own property.

Type of the personal data processed: serial number, room card code, room number, date and time of each entry.

Period of data processing:

- ✓ one month.

Right to objection:

- ✓ The data subject has the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation. In this case, the controller may no longer process the personal data, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2.26. USING THE UNDERGROUND GARAGE

The Avalon Park underground garage is available for a fee.

Purpose of data processing: to use the underground garage at Avalon Park.

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

Type of personal data processed: serial number, barcode, date and time of entry and car registration number.

Period of data processing:

- ✓ eight years in accordance with Section 169 (2) of the Accounting Act.

Possible consequences of not providing the data: the data subject cannot use the underground garage.



CONTACT

2.27. SENDING A MAIL TO AVALON PARK KFT.

If you contact our Company using the contact details provided in this notice or on our website or social media sites, please note that Avalon Park Kft. stores all e-mails and letters received and sent to it, together with the sender's name, e-mail address, address, date, time and other personal data provided in the message.

Purpose of the data processing: to enforce the rights of the controller, admissibility of subsequent evidence.

Legal basis for data processing: the legitimate interest of the controller [Section 6 (1) (f) of the GDPR], as Avalon Park Kft. has a legitimate interest in the enforcement of its rights, in the admissibility of subsequent evidence.

Scope of the data processed: customer name, e-mail address, address, telephone number, date, time and other personal data provided in the message.

Deadline for the erasure of data:

✓ 5 years.

Data processors:

Name	Registered office	Data processor's task
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Creative Management Kft.	H-8200 Veszprém, Boksza tér 1/A.	providing online hosting
Google Inc.	1600 Amphitheatre Parkway, Mountain View, CA 94043, United States of America	provision of e-mail system, based on information published by Google Inc., data is stored on the following server farms in the EU: Dublin, Ireland; Eemshaven, the Netherlands; Hamina, Finland; St Ghislain, Belgium.

Right to objection:

- ✓ The data subject has the right to object to the processing of his or her personal data at any time on grounds relating to his or her particular situation. In this case, the controller may no longer process the personal data, unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

OTHER DATA PROCESSING

Information on data processing not listed in this notice is provided at the time of data collection.

Please note that the court, the prosecutor, the investigating authority, the law enforcement authority, the administrative authority, the National Authority for Data Protection and Freedom of Information, or other bodies authorised by law may contact the data controller to provide information, to disclose or transfer data, or to provide documents.

Avalon Park Kft. will disclose personal data to public authorities only when and to the extent strictly necessary for the purpose of the request, provided that the public authority has indicated the exact purpose and scope of the data.

3. METHOD OF STORING PERSONAL DATA, SECURITY OF DATA PROCESSING

Avalon Park Kft. and its data processors implement appropriate technical and organisational measures to ensure a level of data security appropriate to the scale of the risk, taking into account the state of the art and the cost of implementation, the nature, scope, context and purposes of the data processing and the varying degrees of probability and severity of the risk to the rights and freedoms of natural persons.

Avalon Park Kft. selects and operates the IT tools used to process personal data in the course of providing the service in such a way that the data processed are:

- a) accessible to authorised persons (availability);
- b) authentic and verified (authenticity of data processing);
- c) verifiably unchanged (data integrity);
- d) protected against unauthorised access (data confidentiality).

Avalon Park Kft. takes 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 processed electronically in its various registers, Avalon Park Kft. ensures by means of appropriate technical solutions that the stored data cannot be directly linked and attributed to the data subject, unless permitted by law.

Avalon Park Kft. takes technical, operational and organisational measures to ensure the security of data processing, taking into account the state of the art, which provide a level of protection appropriate to the risks associated with data processing.

In the course of data processing, Avalon Park Kft. retains

- a) confidentiality: it protects 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: grants that when an authorised user needs it, he or she can actually access the requested information and that the means to do so are available.

The IT systems and networks of Avalon Park Kft. and its partners are protected against computer-assisted fraud, espionage, sabotage, vandalism, fire and flood, as well as computer viruses, computer intrusions and denial of service attacks. The operator ensures security through server-level and application-level protection procedures.

Please note that electronic messages transmitted over the Internet, regardless of protocol (e-mail, web, ftp, etc.), are vulnerable to network threats that could lead to fraudulent activity, contract disputes, or the disclosure or modification of information. To provide protection against such threats, the data controller takes all reasonable precautions expected from it. It monitors the systems in order to record any security deviance and provide evidence of any security incidents. System monitoring also makes it possible to check the effectiveness of the precautions taken.

Avalon Park Kft. as the data controller keeps a record of any data breaches, indicating the facts related to the data breach, its effects and the measures taken to remedy it.

Avalon Park Kft. shall notify the National Authority for Data Protection and Freedom of Information of any data breach without delay and, if possible, not 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.

4. DATA AND CONTACT DETAILS OF THE DATA CONTROLLER

Name: Avalon Park Kft.

Registered office: H-1062 Budapest, Andrásy út 126.

Company registration number: 01-09-986876

Name of the registry court: Budapest-Capital Regional Court, Registry Court

VAT number: 23966066-2-42

Phone: +36-46-200-200

E-mail: info@avalonpark.hu

5. LEGAL REMEDIES

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

Right to information:

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

The right of access of the data subject:

The data subject shall have the right to obtain from the data 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 data 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 data 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 profiling, and clear information on the logic used and the significance of such data processing and its 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.

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

The right to information can be exercised in writing via the contact details indicated in the Introduction or in clause 4.

The data subject may also be provided with information orally at his or her request, after his or her identity has been verified and identified.

Right to rectification:

The data subject may request the rectification of inaccurate personal data concerning him/her processed by Avalon Park Kft. and the completion of incomplete data.

Right to erasure:

If one of the following grounds applies, the data subject has the right to have the personal data concerning him or her deleted by Avalon Park Kft. without undue delay upon his or her request:

- 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 data processing is based and there is no other legal basis for the data processing;
- c) the data subject objects to the data processing and there are no overriding legitimate grounds for the data 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 data controller is subject;
- f) the personal data are collected in connection with the provision of information society services.

The erasure of data may not be initiated if the data 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 data 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 data processing:

At the request of the data subject, Avalon Park Kft. will restrict data processing if one of the following conditions applies:

- a) the data subject contests the accuracy of the personal data, in which case the restriction applies for a period of time which allows the accuracy of the personal data to be verified;
- b) the data processing is unlawful and the data subject opposes the erasure of the data and instead requests the restriction of their use;
- c) the data controller no longer needs the personal data for the purposes of data 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 data processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of the data controller override those of the data subject.

Where data processing is restricted, personal data, except for 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.

Avalon Park Kft. shall inform the data subject in advance of the lifting of the restriction on data processing.

Right to data portability:

The data subject has the right to receive personal data relating to him or her which he or she has provided to the data controller in a structured, commonly used, machine-readable format and to transmit such data to another data 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 the data 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 data controller, or necessary for the purposes of the legitimate interests pursued by the data controller or by a third-party, including profiling based on those provisions.

In the case of objection, the data controller may no longer process the personal data, unless it is justified by compelling legitimate grounds 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 has 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 case of objection to the processing of personal data for direct marketing purposes, the data will not be processed by Avalon Park Kft. for this purpose.

Automated decision-making in individual cases, including profiling

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

The above right shall not apply if the data processing is

- a) necessary for the conclusion or performance of a contract between the data subject and the data controller;
- b) permitted by Union or Member State law applicable to the data 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 shall have the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of data processing based on consent prior to its withdrawal.

Rules of procedure

The data controller shall, without undue delay and in any event within one month of receipt of the request, inform the data subject of the action taken in response to the request pur-

suant to Sections 15 to 22 of the GDPR. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by a further two months.

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

If the data controller fails to act on the data subject's request, the data 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.

Avalon Park Kft. will provide the requested information free of charge. Where the data subject's request is manifestly unfounded or excessive, in particular because of its repetitive nature, the data 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 data controller shall inform each recipient to whom or with which the personal data have been disclosed of any rectification, erasure or restriction of data processing that it has carried out, unless this proves impossible or involves a disproportionate effort. Upon request, the data controller shall inform the data subject of these recipients.

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

Compensation for damages and grievance award:

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 data controller or data processor for the damage suffered. The data processor shall be liable for damage caused by the data processing only if it has failed to comply with the obligations expressly imposed on data processors by law or if it has disregarded or acted contrary to lawful instructions from the data controller.

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

The data controller or the data 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.

Complaint to the data protection auditor:

If you have any concerns about data processing by Avalon Park Kft., please contact our data protection auditor: www.ppos.hu/audit

Right to turn to court:

In the event of a breach of his or her rights, the data subject may take legal action against the data controller (at the defendant's place of establishment or the data subject's place of residence, according to the data subject's choice). The court shall act out of turn in the case. Legal proceedings relating to the protection of personal data are free of court fees.

Data protection authority procedure:

Complaints may be lodged with the National Authority for Data Protection and Freedom of Information:

Name: National Authority for Data Protection and Freedom of Information

Registered office: H-1055 Budapest, Falk Miksa u. 9-11.

Mailing address: H-1363 Budapest, Pf.: 9.

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Data protection - <http://www.ppos.hu>
