

PRIVACY STATEMENT

1. What is the purpose of this statement?

The St Matthew Property Management Centre (hereinafter referred to as: Data controller) as the operator of websites accessible by domain names as **szentadalbert.hu**, **primaspince.hu** and **hoteladalbert.hu** (hereinafter referred to as: “Website”) declares in this statement the data processing rules, data protection principles and data processing principles, and the data processing information regarding the Website and the services in connection with the Website, and the data of those who visit the Website or use the services available on the Website (hereinafter referred to as Data Subjects).

Data Subjects may obtain information on personal data processed on the Website, on the principles and practices followed in the processing of personal data and on the ways and means of exercising the rights of the Data Subjects. The Data Subject with the use the Website accepts the information contained in the Data Management Statement, and shall contribute to the processing of the data set out below.

The legal basis for the obligation to provide information from May 25, 2018, is the (EU) 2016/679 decree of the European Parliament and Council (hereinafter referred to as GDPR) in Article 12 and the paragraph 20 of Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter referred to as Privacy Act).

2. The data of the data controller

Name: Szent Máté Ingatlanüzemeltetési Központ (St Matthew Property Management Centre)

Registered seat: 1071 Budapest, Damjanich u. 48.

Taxpayer Identification Number: 19165420-2-42

Website: www.szentadalbert.hu, a www.primaspince.hu, www.hoteladalbert.hu

E-mail: titkarsag@szemik.hu

3. What data processing processes are there on the Website?

This section provides the relevant circumstances for each given data processing, that are required by the GDPR and other sectoral legislation from every data controller.

3.1. Contact via a website

The Data Controller can be contacted via the website for any reason. The details of the data processing associated with this are shown below.

3.1.1. The processed personal data and the purpose of the data processing

- personal data: **name** » purpose of the data processing: **identification**
- personal data: **e-mail address** » purpose of the data processing: **communication**

3.1.2. The legal basis of the data processing

Where the Data Subject contacts the company for the purposes of general enquiries, data processing is based on legislation; considering the Sections 6 (1) c) and (2) of the GDPR, and the (1) b) point of paragraph 5 of the Privacy Act, and the paragraph 13/A Section (1) and (3) of Act CVIII of 2001 on certain issues of electronic commerce services and information society services (Elcom Act).

Where the Data Subject acts on behalf of the legal person as a contact person, the legal basis for the processing of such personal data is the legitimate interest of the Data Controller and the legal person represented by the Data Subject (point (f) of Article 6(1) GDPR). It is in the legitimate interest of both parties to ensure effective business communications and to provide information on any significant circumstances affecting the contract concluded between them to their appointed representatives. The breach of the right of information self-determination of the contact person of a legal person cannot be established because of its job or contractual obligation to facilitate communication between the parties and to provide personal data for that purpose.

3.1.3. The duration of the data processing

1 year after the collection of personal data, or 2 months from the date of the last communication.

3.1.4. The means of processing

In electronic form.

3.2. Data processing associated with signing up for a newsletter

In order to receive up-to-date information on services, the Data Subjects can subscribe to a newsletter via the website. The following information shall apply to the data processing in this context:

3.2.1. The processed personal data and the purpose of the data processing

- personal data: **name** » purpose of the data processing: **identification**
- personal data: **e-mail address** » purpose of the data processing: **communication**

3.2.2. The legal basis of the data processing

Contribution of the Data Subject (point (1)a of Section 6 of the GDPR, the (1) b) point of paragraph 5 of the Privacy Act and the Section (1) of paragraph 6 of Act XLVIII of 2008 on Essential Conditions of and Certain Limitations to Business Advertising Activity).

3.2.3. The duration of the data processing

The Data Controller shall process the personal data until the consent is revoked. You can withdraw your consent at any time by clicking the "Unsubscribe" button in the mail sent to you.

3.2.4. The means of processing

In electronic form.

3.3. The processing of data relating to the issue of an invoice

Upon completion of the services, the Data Controller shall, taking into account Act C of 2000 on Accounting (hereinafter referred to as "Accounting Act"). – issue an accounting document. The details of the data processing associated with this are shown below.

3.3.1. The processed personal data and the purpose of the data processing

- personal data: name » purpose of the data processing: to support the accounting treatment of the completion of the service (economic transaction)
- personal data: address/individual entrepreneur's seat (post code, town, street name, street number together) » purpose of the data processing: to support the accounting treatment of the completion of the service (economic transaction)

3.3.2. The legal basis of the data processing

Mandatory data processing under the operation of law (the (1) b) point of paragraph 5 of the Privacy Act and Section (1)-(3) of paragraph 166 of the Accounting Act, in consideration of the Section 6 (1) c) of the GDPR.

3.3.3. The duration of the data processing

8 years from the date of issue of the accounting document (Section (6) of paragraph 166 of the Accounting Act, in consideration of Section (1) and (2) of paragraph 169 of the Accounting Act).

3.3.4. The means of processing

In electronic form, manually.

3.3.5. Provision of personal data

In view of the fact that, without knowing the personal data discussed in this point, the Data Controller cannot issue an accounting document, the provision of personal data is based on legislation.

4. What rights do the Data subjects have?

The Data Subject may request free information on the details of the processing of his personal data and, in cases determined by law, he may request the rectification, erasure, blocking or restriction of processing of these data, and may object to the processing of such personal data. The request for information and the requests referred to in this point can be addressed by the Data Subject to the contact details of the Data Controller set out in Point 2.

4.1. Right of access

The Data Subject may receive feedback from the Data Controller on the processing of his or her personal data and have access to such personal data and the details of their processing.

4.2. Right to rectification

The Data Controller shall, at the request of the Data Subject, without undue delay, correct the inaccurate personal data relating to the Data Subject, and shall have the right to request the completion of any incomplete personal data – via additional declaration, among other means.

4.3. Right to deletion

The Data Controller shall, at the request of the Data Subject, delete the personal data relating to him or her where the Data Controller does not need to process them, or withdraws his or her consent, or objects to the processing or the processing is unlawful.

4.4. Right to be forgotten

Where the Data Subject requests a deletion, the Data Controller shall endeavor to inform any controller about this request, who has known or could have known the Data Subject's potentially publicly disclosed data, if the Data Subject so requests.

4.5. The right to restriction of data processing

The Data Controller shall, at the request of the Data Subject, restrict the processing where the accuracy of the personal data is disputed or the processing is unlawful or the Data Subject objects to the processing or where the Data Controller no longer needs the personal data provided.

4.6. Right to data portability

The Data Subject may receive or transmit to the Data Controller all personal data relating to him in a structured, commonly used, machine-readable format.

4.7. Responding to requests

The Data Controller shall examine the request as soon as possible and within a maximum period of 30 days, or 15 days in the case of a statement of objections, and shall take a decision as to its merits, which shall be communicated in writing to the requesting party. Where the Data Controller fails to comply with the request, the Data Controller shall state the factual and legal reasons for the rejection of the request to the Data Subject in his decision.

4.8. Enforcement

The protection of personal data and the right of the Data Subjects to information self-determination are important and therefore the Data Controller responds correctly and within the specified periods of time to all requests. With this in mind, the Data Subjects should contact the Data Controller for a complaint, before any official or judicial claim is made, to resolve the conflicts that have arisen among them and the Data Controller peacefully.

If the request fails to reach a conclusion, the Data Subject may assert his rights before a court under Act V of 2013 on the Civil Code (the action may be brought before the tribunal competent in his place of residence or stay) and, as stated in the Privacy Act, he may turn to the Hungarian National Authority for Data Protection and Freedom of Information (1125 Budapest, Szilágyi Erzsébet Fásor 22/c; <https://www.naih.hu/panaszuegyintezes-rendje.html> (hereinafter referred to as NAIH) with his complain.

5. The obligation to notify and to take action

5.1. Notification of addressees

Any rectification, deletion or restriction of data processing shall be notified to the recipients with whom or with which the personal data of the Data Subject have been disclosed, unless this proves impossible or involves a disproportionate effort. At the request of the Data Subject, we shall provide information on these recipients.

5.2. Method of communication, deadline

The Data Controller shall provide information in electronic form on the measures taken within, a maximum of one month of receipt of the request in the scope of Point 4, unless otherwise requested by the Data Subject. This deadline may be extended by a further two months where necessary, having regard to the complexity of the request and the number of requests. The Data Controller shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

When requested by the Data Subject, the information may be provided orally, provided that the identity of the Data Subject is proven by other means.

Where the Data Controller cannot act on the request, the Data Subject shall be informed about the reasons, not later than one month after receipt of the request, and about his right to submit a complaint with the NAIH and can exercise his right for a legal remedy (point 4.8).

5.3. Check

Where there are reasonable doubts regarding the identity of the natural person making the request, the Data Controller may request the provision of additional information necessary to confirm the identity of the natural person. This measure is necessary to facilitate the confidentiality of data processing, as defined in Article 5 (1) (f) of the GDPR, i.e. to prevent unauthorized access to personal data.

5.4. Costs of giving information and taking action

The information provided to, and the measures taken pursuant to the requests in the scope of point 4 shall be free of charge.

Where requests from a Data Subject are manifestly unfounded or excessive, in particular because of their repetitive character, a fee may be calculated taking into account the administrative costs involved in providing the requested data or information or taking the action requested, or a measure taken on the basis of the request is refused.

6. Possible recipients of personal data

6.1. In the context of services

Where the Data Subject provides personal data for services available on the Website, the Data Controller's storage provider shall have access to them as a data processor.

In the performance of the services, the Data Processor's employees who are subject to his duties shall have access to personal data of the Data Subjects.

6.2. In the context of social media platforms

The Website has several social media interfaces; for example, if the Data Subject “likes” or “follows” the site, the Data Controller will be able to receive all personal data belonging to his or her profile and available to the public. On these sites the relevant information on the data processing can be found in the own data processing statement of the service provider.

6.3. In context of issuing an invoice

In relation to invoicing, the tax administration is entitled to know the personal information provided by the Data Subjects for this purpose in the course of its activities.

7. Cookies

In some cases, small data files are placed on the affected devices of the Data Subject to ensure that the Website works properly.

7.1. What is a cookie?

Cookie is a small text file that the site places on the affected device of the Data Subject. This allows the site to “remember” the settings of the Data Subject (e.g. language, font size, display, etc.).

List of cookies used on the Website:

Google Analytics

7.2. What are the cookies used for?

Cookies are essentially because of the customer experience, for the clear and understandable content and the simplification of purchases.

These cookies can be deleted or blocked, but in this case the Website may not work properly.

Cookies are not used to identify the Data Subject concerned.

7.3. How do I handle cookies?

Cookies can be deleted (detailed information: www.AllAboutCookies.org) or can be blocked by most current browsers. In this case, however, some settings will have to be re-configured each time you use the Website and some features will not work.

8. Google Analytics

8.1.

The Website uses the Google Analytics application, which is the web analysis service of the Google Inc. ("Google"). Google Analytics uses "cookies", text files that are saved on your computer to help the analyzation the use of a website visited by the User.

8.2.

Information created by cookies associated with a web pages used by the User is usually sent to and stored on one of Google's servers in the United States. By activating the IP-anonymity on the website, Google has previously shortened the user's IP-address within the Member States of the European Union or in other countries under the scope of the Agreement on the European Economic Area.

8.3.

The transfer of the entire IP-address to the Google server in the US and shortening it there is only done in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate how the User has used the website, and to provide reports to the website operator on the activity of the website and to provide additional services related to the use of the website and the Internet.

8.4.

The IP-address transmitted by the affected browser is not combined in Google Analytics with any other Google data. The Data Subject can prevent cookies from being stored by the appropriate settings of their browser, but please note that in this case not all features of this website may be fully used. The Data Subject can also prevent Google from collecting and processing cookie information (including IP-address) about the use of the affected Website by downloading and installing the browser plugin available at the following link.

<https://tools.google.com/dlpage/gaoptout?hl=hu>

9. Other provisions

9.1. Data collection on activity

The Data Controller may collect data on the activity of the Data Subject which cannot be linked to other data provided by the Data Subject at the time of registration or to data generated by the use of other websites or services.

9.2. Data processing for different purposes

Where the Data Controller intends to use the data provided for a purpose other than that the original data was collected for, the Data Subject shall be informed thereof and his prior express consent shall be obtained by the Data Controller, or the Data Subject shall be given the opportunity to prohibit the use.

9.3. Data security

The Data Controller shall undertake to ensure the security of the data and take technical measures to ensure that the data collected, stored or processed are protected or shall take all measures necessary to prevent their destruction, unauthorized use or unauthorized alteration.

9.4. Obligation to keep records

The Data Controller shall keep a record of the data processing activities carried out under its responsibility (registration of the data processing activity) in accordance with Article 30 of the GDPR.

9.5. Data breach

Data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data. In case of a data breach, the Data Controller shall act in accordance with Articles 33 and 34 of the GDPR. The Data Controller shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken.

9.6. Amendment

The Data Controller may at any time unilaterally amend this Statement. The Data Controller shall inform the Data Subjects of the modifications through the Website. Following the amendment, the use of the Website is subject to the explicit acceptance of the Website by the Data Subject through the Website and as provided for therein.

Valid: 25. 05. 2018.