

Privacy Policy - Cecey Guest House Apartment

Last updated: 25 May 2018

This Privacy Policy sets out how L&D '97 Bt (“Cecey Guest House Apartment”, “Guest House” or “we”) uses and protects your personal data. Cecey Guest House Apartment is the Controller for personal data given to us by guests or prospective guests using the site www.ceceypanzio.hu, as well as for other groups of individuals identified in the policy such as guests interacting with us through different channels, business contacts, and our staff.

In the course of its business activities, Cecey Guest House Apartment requests, obtains, and processes personal data from guests, prospective guests, business contacts, staff, and other individuals. We aim to process the minimum personal data we need in order to provide a good service. We recognise and respect the legal rights and reasonable expectations of individuals over their personal data and privacy.

This Privacy Policy explains how we protect personal data and privacy. Many of the principles we follow are driven by the EU’s General Data Protection Regulation (GDPR). However, we comply with all applicable legal requirements on personal data protection and privacy.

We have tried to make this Privacy Policy easy to use and to understand, within the constraints of the complexity of the information we have to communicate. If you have any questions on the material or any comments or suggestions as to how we might improve the Disclosure, please contact us at:

info@ceceypanzio.hu

You can navigate through this Policy by clicking through the table of contents below. The main sections are the first two which cover:

1. Your rights under GDPR
2. The different processing activities in Cecey Guest House Apartment
3. Legal reference information (including contact details)
4. Terms and abbreviations used in this Disclosure

Table of contents

- [1\) Legal rights of individuals \(“data subjects”\) under GDPR](#)
 - [1.1 Right to receive transparent information](#)
 - [1.2 Right of access to your own data](#)
 - [1.3 Right to rectify inaccurate data](#)
 - [1.4 Right to erasure \(“Right to be forgotten”\)](#)
 - [1.5 Right to withdraw consent](#)
 - [1.6 Right to request restriction of processing](#)
 - [1.7 Right to object to processing](#)
 - [1.8 Right not be subject to automated decisions](#)
 - [1.9 Data portability](#)
 - [1.10 Right to complain to a “Supervisory Authority”](#)
 - [1.11 Right to an effective judicial remedy against a controller or processor](#)
 - [1.12 Contacting Cecey Guest House Apartment regarding GDPR](#)

- [2\) Data processing](#)
- [2.1 Reservations](#)
- [2.2 Registration cards](#)
- [2.3 Contact](#)
- [2.4 Automatically recorded data, cookies and “remarketing codes”](#)
- [2.4.1 Automatically recorded data](#)
- [2.4.2. Cookies and similar technologies](#)
- [2.4.3. Web links](#)
- [2.5 Staff](#)
- [2.6 Business contacts](#)
- [2.7 Wi-Fi](#)
- [3\) Legal reference information \(including contact details\)](#)
- [4\) Terms and abbreviations used in this Policy](#)

1) Legal rights of individuals (“data subjects”) under GDPR

The “data subjects” covered by GDPR are living individuals anywhere who deal with a “controller” in the EU, or living individuals in the EU who deal with a controller outside the EU. A “controller” is the legal entity which defines how personal data is processed. “Personal data” is any data which can be linked to a data subject.

As explained below, data subjects have the following specific rights under GDPR:

- a) Right to receive transparent information
- b) Right of access to own data
- c) Right to rectify inaccurate data
- d) Right to erasure (“Right to be forgotten”) in specific circumstances
- e) Right to withdraw consent
- f) Right to request restriction of processing
- g) Right to object to processing
- h) Right not be subject to automated decisions
- i) Right to data portability
- j) Right to complain to a “Supervisory Authority”
- k) to an effective judicial remedy against a controller or processor

This Policy addresses all of these rights. Under your request on any of them, we will respond without undue delay and in any case within one month, and we will do our best to resolve even complex cases within three months. We will respond to you electronically or by such other medium as you request. We will not charge a fee for an initial request, but we reserve the right to charge an administrative fee for handling a request repeated with a year, or in case of otherwise manifestly unfounded or excessive request.

Note that we will need to verify your identity to be able to act on any request.

If we believe that we should not act on your request, we will write to inform you of the basis for our decision, and also of your options for legal remedy.

Separately from these rights, if you believe that Cecey Guest House Apartment has mistreated you with regard to your personal data or your privacy, please contact us so that we can rectify the situation and improve our service to all guests. You can send a formal complaint to us by email or by post to the address given in section 1.12 “Contacting Cecey Guest House Apartment regarding GDPR” below.

We will aim to respond without undue delay and in any case within in a month.

1.1 Right to receive transparent information

We will provide all information required by GDPR to you in a concise, transparent, intelligible and easily accessible form, using clear and plain language, particularly for any information specifically for children. We shall provide the information in writing or by electronic means. If you request, we will provide information orally.

We will facilitate your exercising your rights as described in the rest of section 1 below.

Section 1.12 "Contacting Cecey Guest House Apartment regarding GDPR" below gives email and postal addresses for contacting us. Certain sections on individual activities in section 2 give dedicated addresses for specific enquiries.

1.2 Right of access to your own data

You have the right to obtain from Cecey Guest House Apartment confirmation as to whether personal data on you is being processed, and, if so, to access the data and the following information:

- a) the purpose of the processing
- b) the categories of personal data concerned
- c) the recipients to whom we have disclosed or will disclose the personal data, in particular recipients in countries outside the EU
- d) the period for which the personal data will be stored
- e) the existence of your right to request us to rectify or erase personal data or to restrict processing of personal data or to object to such processing
- f) your right to lodge a complaint with a Supervisory Authority
- g) where the personal data are not collected directly from you, information as to their source
- h) whether there is any automated decision-making from the data, and, if so, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.
- i) Where we transfer your personal data to a country outside the EU, the appropriate safeguards we have in place to protect your rights.

1.3 Right to rectify inaccurate data

If we hold inaccurate or incomplete personal data on you, we will rectify this without undue delay on receiving your request.

1.4 Right to erasure ("Right to be forgotten")

You have the right to request us to erase your personal data and for us to act on the request without undue delay, where one of the following grounds applies:

- (a) Your data are no longer necessary in relation to the purposes for which they were originally processed
- (b) You withdraw consent and we have no other legal basis for processing your data
- (c) Our basis of lawfulness for processing is our legitimate interests, and you claim that we have no legitimate grounds for the processing which override your interest, rights, and freedoms
- (d) The processing is for direct marketing, and you object to this
- (e) We have been unlawfully processing your data
- (f) We have to erase your data for compliance with a legal obligation in EU or Member State law to which we are subject
- (g) Our basis of lawfulness for processing the data is consent given by a guardian for a child, and either (I) you are the guardian and the child is still under the age of consent, or (II) you are the child now older than the age of consent. (In Hungary, the age of consent for processing of personal data is: 16.)

Please note that we cannot erase your personal data to the extent that processing is necessary:

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation which requires processing;
- (c) for reasons of public interest in the area of public health;
- (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the request is likely to render impossible or seriously impair the achievement of the objectives of such processing; or
- (e) for the establishment, exercise or defence of legal claims

Your data will continue to exist temporarily on backup files after this deletion, but we use IT security techniques to ensure that these are accessible only for the purpose of restoring the database in the event of a loss of data and that they cannot be copied to reveal data. We destroy backup files on a rotating basis within 12 months.

1.5 Right to withdraw consent

Where you have given us consent for any processing, you have the right to withdraw consent at any time. You can do this by sending a request to the email address given in the relevant subsection of section 2 Activities below, which lists the different activities for which we manage personal data. Alternatively, you can write to us at the address in section 1.11 below.

Note that your withdrawal of consent will not affect processing which we have already done.

1.6 Right to request restriction of processing

You can request that Cecey Guest House Apartment restricts the processing of your personal data where one of the following applies:

- You contest the accuracy of the personal data
- We no longer have a basis of lawfulness for processing, but you oppose us erasing the data and you request that we restrict their use instead
- We no longer need the data for the original purpose, but you require them for the establishment, exercise, or defence of legal claims
- You object to our processing on the grounds that we state our legal basis as “our legitimate interests” but you claim that your “interests, rights, and freedoms” override these.

Where processing is restricted under your objection, except for continuing to store the data we shall process them only with your consent or:

- a) for the establishment, exercise or defence of legal claims
- b) for the protection of the rights of another person, or
- c) for reasons of important public interest of the EU or of a Member State.

Where we restrict processing, we shall inform you before we lift the restriction.

Operational practicalities may prevent us restricting processing precisely as envisaged by GDPR, but in such a case we will work with you to try to find a satisfactory resolution.

1.7 Right to object to processing

You have the right to object to our processing your personal data where:

- Our basis of lawfulness for processing is “our legitimate interests” but you claim that your “interests, rights, and freedoms” override these
- We process your data for direct marketing purposes, including “profiling” to the extent that it is related to

such direct marketing. (Profiling is automated decision making which analyses or predicts aspects such as your economic situation, personal preferences, behaviour, or location.) Where you make such an objection we shall no longer process your data for such purposes.

1.8 Right not be subject to automated decisions

You have the right not to be subject to a decision based solely on automated processing, if this produces legal effects on you or similarly significantly affects you.

However, this does not apply:

- (a) if the decision is necessary for us to perform a contract with you or if we have your explicit consent, or
- (b) if the automated process is authorised by a EU or Member State law which also defines measures we have to follow which safeguard your rights, freedoms, and legitimate interests.

In case (a), we have to implement suitable measures to safeguard your rights, freedoms, and legitimate interests. This includes at least your right to make us ensure human intervention, and your right to express your point of view and to contest the decision.

1.9 Data portability

GDPR gives a data subject the right in certain circumstances to receive the personal data concerning him or her “in a structured, commonly used and machine-readable format”. The right includes having the personal data transmitted directly from one controller to another, where technically feasible.

Where you apply under 1.2 above for access to your own personal data, we will normally supply this in a commonly-used electronic format, unless you specifically ask us to send you a written copy.

1.10 Right to complain to a “Supervisory Authority”

If you believe that we have treated you unfairly or unlawfully under GDPR, you can complain to a Supervisory Authority for data protection. If you are normally resident in an EU country other than Hungary, you have the right to raise a complaint with the Supervisory Authority of that country. This link will give you the name and contact details:

http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm

If you are normally resident in Hungary or outside the EU, you can complain to the Hungarian Authority:

The Hungarian National Authority for Data Protection and Freedom of Information

1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Postal address: 1530 Budapest, Pf.: 5.

Telephone: +36 -1-391-1400

Fax: +36-1-391-1410

E-mail address for correspondence in English: privacy@naih.hu

E-mail address for correspondence in Hungarian: ugyfelszolgalat@naih.hu

Website: <http://naih.hu>

1.11 Right to an effective judicial remedy against a controller or processor

If you believe that your rights under GDPR have been infringed as a result of the processing of your personal data in non-compliance with GDPR, you have the right to an effective judicial remedy.

Proceedings against a controller or a processor shall be brought before the courts of the EU Member State where the controller or processor has an establishment. Alternatively, such proceedings may be brought before the courts of the EU Member State where your habitual residence is.

In Hungary, regional courts shall have jurisdiction in handling the case. Data subjects can also choose to bring actions at regional courts of their domicile or residence. Even individuals with no locus standi can be parties to the proceedings. The Authority has the option to intervene for the data subject to succeed in the proceedings.

Court proceedings shall be governed by GDPR, by the provisions of Act V of 2013 on the Civil Code, Book Two, Part Three, Title XII (Sections 2:51 to 2:54), as well as by other legislative provisions applicable to court proceedings.

1.12 Contacting Cecey Guest House Apartment regarding GDPR

Certain sections on individual activities in section 2 give dedicated contact addresses for specific enquiries. Otherwise, to exercise one of the rights described above, or to make a complaint directly to Cecey Guest House Apartment or to contact us with a general enquiry regarding GDPR or privacy, the email and postal addresses are:

Email: info@ceceypanzio.hu

Address: L&D '97 Bt; H-3300 Eger, Cecey Éva u. 30., Hungary

2) Data processing

A separate document attached to this Policy contains the list of intra-EU data transfers and controllers; data transfers to third countries are further highlighted in this Policy.

2.1 Reservations

For reservations made online, in person at our Guest House, or by phone, we ask for some or all of the following personal data fields:

- Full name
- Title
- Arrival date
- Departure data
- Number of adults in the room
- Type of room
- Email address
- Full postal address
- Arrival time
- Free text – including for example any preferences

Purpose of data processing:

The purpose of our collecting this data is to enable us to identify the guest making the reservation, so that we can keep the room for the right person at check-in, and to record a means of payment so that we avoid financial risk if the guest does not check in to the Guest House. We will use your email address (i) in the unusual situation where we have to advise you of a change impacting your reservation

(ii) three days before your planned arrival, in order to remind you of details such as the Guest House address and check-in time, and

(iii) three days after you leave to ask for comments on your stay, in order that we can improve our service for future

visits for you and other guests.

Legal basis of data processing:

The basis of lawfulness of our processing this data is that we need them in order to fulfil a contract to reserve a room for you. We process your email address in addition to send you a post-stay email for “legitimate interests pursued by the controller, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject”. Our legitimate interests here are maintaining a high quality of service, and we believe that sending you the post-stay email does not affect your fundamental rights.

If you do not give us the data requested we will either be unable to reserve a room for you or be unable to contact you if there is a problem.

Transfer of data outside the EU:

When you make a reservation on our website you are entering data into an application run by Sceptre Hospitality Resource, a USA company. Your personal data is therefore transferred outside the EU. In order to ensure that you maintain the rights you have under GDPR over your personal data, we have implemented the following safeguards:

a) We have contractual terms between Sceptre and ourselves defining and restricting the processing they do on the data;

b) Sceptre is certified for the “EU – US Privacy Shield”. This is an intergovernmental agreement between the EU and the USA and is recognised by the EU Commission as ensuring protection of data equivalent to data protection standards in the EU.

The EU Commission decision can be seen on their official website, for example their press release of 18 October 2017 at http://europa.eu/rapid/press-release_IP-17-3966_en.htm.

Period of data processing:

We manage retention of personal data at the level of individual data fields, rather than at the level of the total data for a guest. For example, we may retain a record of your name and check-in date for longer than your email address. Data processed for the purposes of providing our services are retained for 2 to 8 years, depending on such data.

In some cases we have a statutory obligation to hold personal data for an extended period. The main categories are:

- Where information is needed for an invoice or other tax records, we have a statutory obligation to retain this for 8 years after the end of the calendar year. Thus if we invoice you on check-out on 30 June 2018, we have to keep the data until 31 December 2026.
- A hotel has a statutory obligation to make a report to its Municipality for all guests who check-in, and a report to the Police for all guests from outside the EU who check-in. We have a statutory obligation to keep the information included in these reports for 6 years from the date of check-in.

If, by checking the corresponding box, you request us to retain your data in order to facilitate future reservations (purpose of data processing), the legal basis for our data processing will be your voluntary consent. Therefore if, by not checking the corresponding box, you do not give your consent to our data processing, you'll have to enter such data again when making your next reservation. You can withdraw your consent any time, however the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. In such cases, your personal data are retained for 8 years after your latest reservation.

We delete all personal data after the longest of the relevant retention periods above.

If you wish to exercise any of your rights referred to in Section 1, regarding the data recorded in the course of the above activities, or if you wish to contact us for any other reasons, please, inform us by sending an e-mail to info@ceceypanzio.hu

2.2 Registration cards

Scope of data and legal basis of data processing:

Personal data to be provided on a compulsory basis (Provision of these data by the Guest is a precondition for the use of services):

- Processing of the following data is required by law, e.g. first name, last name, mother's name, billing data.
- In order to provide the requested services (accommodation, wellness etc.) (on a contractual basis) we also process the following data: contact details, loyalty programme registration number, and mode of payment, debit card details, room number, and number of guests.
- On the basis of the Company's legitimate interest to improve its services, for three days after you leave we process your name and email address in order to ask you for your opinion on our services and thus to improve them.

Non-compulsory statistical data:

- For statistical purposes, the following data are processed separately from personal data: business trip, holiday.

By the time you check in, some data will be filled on the basis of your reservation in order to speed up the check-in process. You are kindly asked to always check the accuracy of your data.

Purpose of data processing:

Provision of hotel services, including communications and the improvement of services.

Period of data processing:

We manage retention of personal data at the level of individual data fields, rather than at the level of the total data for a guest. For example, we may retain a record of your name and check-in date for longer than your email address. Data processed for the purposes of providing our services are retained for 2 to 8 years, depending on such data.

In some cases we have a statutory obligation to hold personal data for an extended period. The main categories are:

- Where information is needed for an invoice or other tax records, we have a statutory obligation to retain this for 8 years after the end of the calendar year. Thus if we invoice you on check-out on 30 June 2018, we have to keep the data until 31 December 2026.
- A hotel has a statutory obligation to make a report to its Municipality for all guests who check-in, and a report to the Police for all guests from outside the EU who check-in. We have a statutory obligation to keep the information included in these reports for 6 years from the date of check-in.

If, by checking the corresponding box, you request us to retain your data in order to facilitate future reservations (purpose of data processing), the legal basis for our data processing will be your voluntary consent. Therefore if, by

not checking the corresponding box, you do not give your consent to our data processing, you'll have to enter such data again when making your next reservation. You can withdraw your consent any time, however the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. In such cases, your personal data are retained for 8 years after your latest reservation.

If you wish to exercise any of your rights referred to in Section 1, regarding the data recorded during check-in, or if you wish to contact us for any other reasons regarding your data recorded during check-in, please, let us know by sending an e-mail to info@ceceypanzio.hu

2.3 Contact

You can contact us at any of our contact details (e-mail, Facebook, phone, by post or through the forms developed for this purpose, e.g. inquiry). In such cases, we assume your consent to the processing of personal data shared with us.

Purpose of data processing:

Maintaining contact with the requesting person, answering and resolving the question/request.

Legal basis of data processing:

Since you contacted us, the legal basis of data processing is your (presumed) voluntary consent. You may withdraw your consent at any time, however, in this case we cannot answer your request. The withdrawal of consent shall not affect the lawful processing based on consent before its withdrawal.

Please note, that the data fields of certain forms have been developed according to our experiences, thus you are only requested to give the data most necessary for answering the question/request. The mandatory fields are marked with a red asterisk.

Period of data processing:

After answering the relevant request, question or complaint, the messages and the personal data obtained in this context shall be deleted after the year following the given year. However, for tax and accounting purposes or if it is necessary to protect the applicant's rights and interests, these data are archived and retained for as long as necessary which period is individually defined in each case.

2.4 Automatically recorded data, cookies and "remarketing codes"

2.4.1 Automatically recorded data

When you open our website on a device (such as a laptop or desktop computer, a smartphone or a tablet) select data of that device will be automatically recorded. The data automatically recorded include the IP address of your device, the date and time of your visiting our website, the browser type and the domain name and address of your Internet provider. The recorded data will be automatically logged by the web server of the website, without requiring your consent or any dedicated activity on your part. The system uses the recorded data to automatically generate statistical data. These data cannot be associated with other personal data except where such an association is mandated by law. These data will exclusively be used in an aggregated and processed form, to correct errors and improve the quality, of our services, and for statistical purposes.

Purpose of data processing:

The technical development of the informatics system, to monitor of the service, and to generate statistical data. In case of fraudulent activities these data can also be used – in co-operation with the user's Internet provider and the

law enforcement authorities – to determine the source of such fraudulent activities.

Legal basis of data processing:

The requirement of the provision of the service as per Act CVIII of 2001 on certain issues of electronic commerce services and information society services, Article 13/A Section (3).

Period of data processing: 30 days from your opening our website.

2.4.2. Cookies and similar technologies

What are cookies?

Cookies are small, text-based files which are stored on the hard disk drive of computers or smart devices until their validity end date set within the cookie file, and is activated (sending a notification to the web server of the website) every time the website is opened in a browser on the device. Websites use cookies for the purpose of recording information regarding the use of the website (pages visited, time spent on the pages, browsing information, logouts etc.) and personal settings – but these data cannot be associated with the visitor's identity. Cookies allow the websites' operators to maintain user-friendly sites and enhance the user experience their websites offers to their visitors.

On platforms where cookies are not available or cannot be used, other technologies are applied to achieve goals similar to those of using cookies – examples include the ad-IDs used on Android-based mobile devices.

Cookies come in two types: "session cookies" and "persistent cookies".

- "Session cookies" are only stored on the computer or smart device temporarily while the visitor is using the website; these cookies allow the system to "remember" certain information, so the visitor will not have to provide them every time they open the website. The validity period of session cookies is limited to the duration of the use of the website; the purpose of the use of session cookies is to prevent the loss of data (for example when filling in a longer form). At the end of each use of the website – each session – as well as when the browser is closed cookies of this type are automatically deleted.
- "Persistent cookies" will remain stored on the computer or smart device after the website is closed. Cookies of this kind are used to allow the website to identify returning visitors. Persistent cookies identify returning visitors by associating the server-side ID with the user, therefore they are an essential part of the functionality of websites which require the users to be authenticated – for example on web stores, netbanking websites and webmail sites. The persistent cookies do not contain personal data, they can only be used for the unique identification of users by associating them with the proper item in the database stored on the web server of the website. The inherent risk of using persistent cookies is that they can only identify the web browser as opposed to the user themselves, so if a user uses a public access point – such as a computer in an Internet café or a public library – to log in to a web store and fails to log out of the store at the end of their session another person can have unauthenticated access to the web store, being falsely identified by the system as the original (and therefore authenticated) user.

How can I allow and disable cookies?

Most Internet browsers automatically allow cookies, but the users can delete or reject them. As every browser is different you can set your cookie preferences manually in the Settings section of your browser. If you do not want to allow any cookies of our website on your device you can modify your browser settings so you are notified of cookies sent to your device, or you can simply reject all cookies. You can also delete the cookies stored on your computer or mobile device, any time. For more information on modifying the browser settings please consult the Help function of your browser. Please note that if you choose to disable cookies you limit the functionality of the website.

What cookies do we use?

1. Cookies essential for the operation of the website:

These cookies are essential for the proper functionality of the website, so in their cases the legal basis of data processing is the requirement of the provision of the service as per Act CVIII of 2001 on certain issues of electronic commerce services and information society services, Article 13/A Section (3). No transfer of data occurs.

2. Cookies to obtain statistical data

The sole function of these cookies is to obtain statistical data, which means they do not involve personal data. They monitor the visitor's use of the website, which topics they prefer, what they click on, how they scroll on the website, what pages they visit. It is important to note that these cookies strictly obtain anonymous data. These cookies let us know, for example, how many visitors has our website per month. The obtained statistical data allow us to improve our website so they reflect the preferences of our users even more. Google Tag Manager (and Google Analytics) and Hotjar help us obtaining such statistical data.

3. Marketing cookies

The purpose of using marketing cookies is to create and send personalised ads.

Legal basis of data processing: Using these cookies always require the recipient's consent which the recipient may grant us in a pop-up window on the website. The user may withdraw their consent any time, however, the withdrawal of consent shall not affect the lawful processing based on consent before its withdrawal. Upon the withdrawal of consent the personalised ads created for the user will not be published on other sites.

If you wish to exercise any of your rights referred to in Section 1, regarding the data recorded in the course of the above activities, or if you wish to contact us for any other reasons, please, inform us by sending an e-mail to info@ceceypanzio.hu.

2.4.3. Web links

Our website may contain web links to sites which are not managed and operated by the Company, and are linked to our site for the purpose of providing information to the users. The Company has no influence over, and therefore may not be hold responsible for, the content and the safety situation of the websites managed by its partner companies. Please, consult their privacy policies before providing any information on such websites you visit.

2.5 Staff

All of the information in this Policy and all of the rights described in section 1 also apply to the staff of L&D '97 Bt and Cecey Guest House Apartment and to our processing of their personal data.

We provide staff directly with full information of our Employee Privacy Policy and of our processing of their personal data.

2.6 Business contacts

In common with most companies, we deal with individuals at other organisations and store their name, business function, and business contact details.

Purpose of data processing:

This is done by mutual agreement in order to enable our two companies to communicate with a view to working together.

Legal basis of data processing:

Our basis of lawfulness for doing this is “our legitimate interests in the performance of the contract or keeping contact between companies”.

We will not use the data on these business contacts other than to facilitate business with the other company. For example, we will not market services to the individuals whose data we hold or transfer the data to any third party.

Period of data processing:

At least annually we will review our records of business contacts and delete those which are no longer current.

The same policy applies to the processing of personal data of press contacts.

2.7 Wi-Fi

In order to reach Wi-Fi we may request name and address to be given. Simultaneously, the system records the IP address of your device.

Purpose of data processing:

The purpose of data processing is ensuring that services are reached during Wi-Fi usage, while following your departure, handling of complaints and detection of fraud or abuse.

Legal basis of data processing:

The legal basis for data processing is the „performance of the contract”, considering the fact that reaching Wi-Fi is one of the services provided by our Guest House. However, following your departure the legal basis is “the legitimate interest of the controller related to the handling of complaints and detection of fraud or abuse”. Providing your data is an indispensable condition for using the services.

Period of data processing:

The data are erased within 1 (one) year of the year under review.

3) Legal reference information (including contact details)

Under GDPR, Cecey Guest House Apartment, as the controller of the personal data which it processes, must publish information about its legal name and how to contact it, together with other details. This section contains all the information required by GDPR, together with some useful additional legal information.

The full legal name of the legal entities which operates our Guest House is:

Full legal name: L&D '97 Bt.

Foreign name: Cecey Guest House and Apartent

Registered seat: 3300 Eger, Cecey Éva u. 30., Hungary

Registration number: 10-06-022607

Tax number: 23256233-1-10

It is represented by: Papp Istvánné

E-mail: info@ceceypanzion.hu

Its business activity is: accommodation and services

4) Terms and abbreviations used in this Policy

Most of the definitions refer to the EU's General Data Protection Regulation (GDPR). This is a legal document, and it is not possible to give a short definition in simple language which is fully exact. The aim here is to give a clear explanation which will facilitate the reader's understanding; this may sometimes exclude detail of the full legal definition. Our policy is to comply with the full requirement of GDPR, and your rights are not affected by any simplification in the explanations here.

Term or Abbreviation	Explanation
Controller	The legal entity which determines the purposes and means of the processing of personal data;
Data subject	A live individual inside or outside the EU dealing with an organisation in the EU. Such an individual is a "data subject" and under GDPR has rights over the processing of his or her personal data.
EU	The European Union
GDPR	The General Data Protection Regulation of the EU, which came into force 25 May 2018.
Personal data	Any information relating to an individual who is or can be identified through a wide variety of methods, including but not limited to: <ul style="list-style-type: none"> • The individual's name, identification number, address, mother's birth name, or • One or more factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.
Processing	Any operation or set of operations which is performed on personal data, whether or not automatically means, including but not limited to: Collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, combination, restriction, erasure, or destruction.
Processor	A legal entity which processes personal data on behalf of a controller.
Profiling	Automated processing which uses personal data in order to analyse or predict aspects of performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location, or movements of an individual
Pseudonymisation	Encrypting or otherwise holding personal data in a way in which it cannot be linked to a specific data subject without additional information. The additional information has to be kept separately and protected by technical and organisational measures to prevent its unauthorised use.
Special categories of data	There are very strict restrictions on processing of personal data within "special categories". These are: <ul style="list-style-type: none"> • Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, • The processing of genetic data, biometric data for the purpose of uniquely identifying an individual, data concerning health or a person's sex life or sexual orientation, or

Term or Abbreviation	Explanation
	<ul style="list-style-type: none"><li data-bbox="403 147 703 181">• Criminal convictions.
Supervisory Authority	An independent public body set up by an EU state to monitor the application of GDPR and, as necessary, to intervene to protect the rights of individuals under GDPR
Third Country	Any country outside the EU
Transfer	Sending of personal data from the controller or processor to a legal entity outside the EU.