

### PRIVACY POLICY

We focus on protecting your private data during your online reservations or subscription to our newsletters. Therefore we would like to let you know the privacy policy applied when we handle your personal data. Hereby we inform you what data we collect, how we handle and protect their privacy and for what purpose we collect them.

#### **Contact Details**

This webpage is operated by Hotel Garden Kft. Address: 8380 Hévíz, Lótuszvirág u. 1.

Telephone: +36 83 500 500 e-mail: info@lotustherme.net

#### Newsletter

### I. Subscribing to the newsletter by using the "Newsletter" menu

After filling in your surname and family name and your email address (and any further information of your free will) at the "Newsletter" menu of our webpage you deliberately express your approval to be emailed from Hotel Garden Kft. by checking in the approval checkbox and submitting the subscribe form. You deliberately express your approval and agree that Hotel Garden Kft can email you (and mail you once you filled in your postal address, too) information and promotional material and to process your personal data for market research purposes as written in this privacy policy.

### II. Subscribe through online reservation

We inform you that by ticking in the checkbox for newsletter subscription in our online room reservation system you deliberately express your approval and agree that Hotel Garden Kft. can send information and promotional material to the email address (and postal address) that you used for your online reservation.

# III. Personal subscription at the front desk of the reception or subscription on the phone

You have the opportunity to subscribe to the newsletter of Hotel Garden Kft. at certain platforms. By ticking in the checkbox for newsletter on the registration form given at the reception of Lotus Therme Hotel & Spa or by sending a confirmation to our e-mail massage after you have contacted us, you deliberately express your approval and agree that Hotel Garden Kft. can send information and promotional material to the email address (and postal address) that you have provided on the registration form.

We inform you that you can unsubscribe from our newsletter database anytime. You can unsubscribe by using the "unsubscribe" link in our newsletters or by sending us your request to unsubscribe, to any of the contact details of Hotel Garden Kft. set above.

## **Data privacy policy**

By subscribing to our newsletter, sending an online booking or filling in the hotel registration form, you deliberately express your approval that Hotel Garden Kft can handle and process your personal data (according to the privacy policies set in here) to provide the services you applied for.

We undertake the responsibility of handling and processing the data of our registered users privately, secure and with accordance to the governing law. We undertake the responsibility of meeting all criteria of the Information Law of Hungary (CXII./2011) and all other concerning regulations. We define the procedure and handling of personal data in accordance with the definitions of Information Law. We keep the right to change the information in this privacy policy without any notification once the governing law is changed or modified. Only the actually published (at www.lotustherme.net) version of the privacy policy is considered to be valid among all other (former) versions. All data collected by any method written above are handled and processed by Hotel Garden Kft.

Hotel Garden Kft. is registered at the Hungarian National Privacy Policy and Information Authority (Nemzeti Adatvédelmi és Információs Hatóság) under the registration ID NAIH-58840/2012. All of your personal data that you provided by the time of your online reservation or newsletter subscription will be processed and handled for marketing and market research purposes with the aim of registering you as frequent customer and to handle your discounts or to send you (as a subscribed addressee after your free will) information and promotional material via email or post. Personal data are only handled and processed after the permission of the client or in order to comply with the obligation set by the governing law. Hotel Garden Kft. will only process and handle your personal data in accordance with your deliberate approval and free will - considering the regulations of the governing law. All data that you deliberately provide us are stored, processed and handled in orded to provide the services you applied for. We only ask those data that are needed to provide these services. Concerning these data we undertake the responsibility to keep the privacy policy as follows:

- We collect and handle personal data fairly and in accordance of the regulations of the governing law.
- We collect and handle personal data only for rightful purposes defined above and we do not use them for any other purpose.
- The method processing is available to store and handle the data JUST AS LONG as the data-storing is required or allowed by the client.
- We only process and handle the data that are required for providing the services set above
- We consider all data processed by us to be exact, complete and up to date.
- The storing period of any data is just as long as it is required to complete the services undertaken.
- We provide every right of the concerned persons as set in the Information Law and other concerning laws and regulations.
- We do all technical and organizational steps to reduce the risk of any damage (illegal abuse, loss of data etc) in the collected data.

By deliberately expressing your approval to Hotel Garden Kft. for handling and processing your data you accept and agree all terms set in here. We do not provide access or transfer your data to any third entity unless you deliberately express your will toward us to do so. We inform you that the validity of your personal data is your responsibility. We do not undertake responsibility for any damages caused by invalid data provided by you. You can ask information about your handled data from us through our contact details given above. You can also ask us to modify, delete or block access to your data. Such requests need to be sent in a written form to any contact details of Hotel Garden Kft. as set above. If you do not agree with our decision, you can take the matter to court within 15 days of our statement.

# Information about the electronic monitoring system in the Lotus Therme Hotel & Spa operated by Hotel Garden Kft.

### Dear Guest!

- 1. We would like to inform you that Hotel Garden Kft. (8380 Hévíz, Lótuszvirág u. 1.) operates an electronic monitoring system in Lotus Therme Hotel & Spa. The electric monitoring systems are handled by the employees of Bank Biztonság Bizalom Zrt.
- 2. Please be informed that for the rules of the use of the electronic monitoring system are the regulations of act CXXXIII. of 2005 (Szvtv.) about personal protection, property protection and about rules of private investigation activities, furthermore, the regulation of act CXII. of 2011. about the right of informational self-determination and freedom of information, applicable. Consequently, the electronic monitoring system operates as set out in Szvtv 30. §, based on deliberately expressed approval, as stated below, for the sake of protection of human life, physical safety, and property protection, to prevent and detect accidents and tresspasses, to catch committer in the act, and to evidence trespasses. As the application of the electronic monitoring system involves data management, this activity is under the supervision of the National Authority for Data Protection and Freedom of Information.
- 3. Please note that entering the places monitored with camera is qualified as express consent
- 4. The registration number of the data management accomplished by Hotel Garden Kft. is NAIH-69604/2013
- 5. Processed data: facial photograph as seen on the camera view and other personal data of the guests
- 6. Our electronic monitoring system operates 24 hours per day 7 days a week.
- 7. People entitled may inspect the recordings of the monitoring and recording system operated by Hotel Garden Kft. to evidence trespasses against human life, physical safety or property, to identify committer or reveal other cases or accidents related to human life or physical safety.
- 8. Hotel Garden Kft. keeps record of these inspections, incl. name of the person performing the inspection, time and reason for the inspection. For the sake of the secure data handling, data protection is secured with a personal user name and password, this will enable us to see who and when had access to the data.
- 9. Data can be forwarded in case of legal proceedings or proceedings instituted by a public authority related to unlawful behaviour or breach of obligation. Forwarded data can be a recording made by the monitoring system showing relevant information and the name of the people appearing on the recording.
- 10. For your information, people whose right or legitimate interest is affected by the recording, may make a request for a copy of the recording made about them or ask for deletion of these recordings in accordance with the relating legal provisions. People whose right or legitimate interest is affected by the recording, may make a request about the recording NOT to be deleted or cancelled, within 3 working days from date the of recording. You can ask information about your handled data from Hotel Garden Kft. You can also ask us to modify, delete or block access to your data. You can protest handling personal against your data. In case of violating your rights, according to the regulations of the related legislation, you may initiate an inspection with a notification sent to the Hungarian National Privacy Policy and Information Authority or take the matter to the Court, referring to the breach or imminent danger of breach of the personal data privacy.
- 11. The following cameras are operating in/around Lotus Therme Hotel & Spa in 3 groups:

Group I.: 9 outdoor cameras, monitoring the whole area of the roofed car park by the watchman, to safeguard cars. Recordings are saved for 3 working days, on the server that is located in the guard-house at the crossing gate.

The following people are authorized to check the recordings in case of tresspasses/occurrences as stated at item 7:

- General Manager, Director of Operations, or in case of unavailability of these, the Manager on Duty or Local Commissioned Leader of the Bank Biztonság Zrt.

Group II.: 4 cameras are monitoring the pools and their surroundings at our spa department to protect life and physical safety, to minimize possible accidents in the pool area and to aid a quick reaction by the staff in case of an accident. Furthermore, these cameras serve property protection of the articles taken and left unattended at our pool area. Recordings will be supervised by our bath attendant and the employee of the Bank Biztonság Zrt. on duty, these recording will be saved for 3 working days, onto the server located in a closed box at our wellness area.

The following people are authorized to check the recordings in case of tresspasses/occurrences as stated at item 7:

- General Manager, Director of Operation, or in case of unavailability of these, the Manager on Duty or Local Commissioned Leader of the Bank Biztonság Zrt.

These cameras are located as follows:

- 1. 1 camera monitoring our indoor relax pool
- 2. 1 camera monitoring our indoor thermal pool
- 3. 1 camera monitoring our meditation pool
- 4. 1 camera monitoring our rear wellness entrance outside

Group III.: 16 cameras monitoring our inside and outside entrances and different areas, for the sake of property protection of the hotel properties, appliances, stock and property protection of personal items taken to the hotel by the guests. Therefore, entrances and approach roads, reception and storage rooms of the hotel will also be monitored. This monitoring aims to prevent accidents related to human life or physical safety and reconstruct the case if any of these occurs. Camera pictures will be observed by the employee of Bank Biztonság Bizalom Zrt. on duty, these will be saved for 3 days onto the server located at the staff entrance.

Following people are authorized to check the recordings in case of tresspasses/occurrences as stated at item 7:

- General Manager, Director of Operation, or in case of unavailability of these, the Manager on Duty or Local Commissioned Leader of the Bank Biztonság Zrt.

### Location of these cameras:

- 1. 1 outdoor camera monitoring the crossing gate at the entrance of the roofed car park
- 2. 1 outdoor camera monitoring the staff entrance
- 3. 1 outdoor camera monitoring the bridge to the riding-school
- 4. 1 outdoor camera monitoring the emergency exit on the north side of the main building
- 5. 1 indoor camera monitoring the main entrance
- 6. 7. 1 indoor camera monitoring the reception counter and the hotel lobby area located directly in front of the reception counter

- 8. 1 outdoor camera monitoring the rear entrance of the kitchen and ramp
- 9. 1 outdoor camera monitoring the road to the rear entrance of the kitchen
- 10. 1 indoor camera monitoring the forefront of the beer fridge-storage room
- 11. 1 indoor camera monitoring the entrance of the freezing chambers
- 12. 1 indoor camera monitoring the corridor in front of the changing rooms for the staff
- 13. 1 indoor camera monitoring the area in front and behind the delivery desk of the hot food kitchen
- 14. 1 outdoor camera monitoring the road to the rear entrance of the kitchen
- 15. 1 indoor camera monitoring the corridor in front of the storage room for dry products
- 16. 1 indoor camera monitoring the fitness room