

# Data protection information

## to the website

Version 1.0

- Pursuant to Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (Infotv) and Regulation (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) 95/46/EC (General Data Protection Regulation).

**Effective from 01 November 2023**

**Club Pannon Camps & Hotels Kft**  
7625 Pécs Hunyadi utca 19.

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## The purpose of this notice:

The purpose of this notice is to provide information to data subjects on the data processing activities of **Club Pannon Camps & Hotels Kft.** in a concise, transparent, understandable and easily accessible form, in a clear and plain language, in accordance with the legislative intent of Article 12(1) of the Data Protection Regulation.

## 1. The data controller

### **Club Pannon Camps & Hotels Ltd.**

Location: 7625 Pécs Hunyadi utca 19.

Company registration number: 02 09 068822

Tax number: 12136399-2-02

Central e-mail address: [reservation@aranypartcamping.hu](mailto:reservation@aranypartcamping.hu)

Central e-mail address: [reservation@mirabellacamping.hu](mailto:reservation@mirabellacamping.hu)

Central e-mail address: [reservation@karoscamping.hu](mailto:reservation@karoscamping.hu)

Central e-mail address: [reservation@platan-hotel.hu](mailto:reservation@platan-hotel.hu)

The company shall carry out its data management activities in accordance with the legislation in force. As of May 25, 2018, the Company carries out its data processing activities in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (EU) on the General Data Protection Regulation (GDPR) (hereinafter referred to as the General Data Protection Regulation), taking into account the opinions of Work Group 29 and the relevant regulations in the Member States.

### 1.1. Contact details of the persons responsible for data protection

Name:	Aranypart Camping
Address:	8600 Siófok, Szent László utca 183-185.
Responsible person:	Tímea Takács
Phone:	+36 30 768 40 26
E-mail address:	<a href="mailto:reservation@aranypartcamping.hu">reservation@aranypartcamping.hu</a>

Name:	Mirabella Camping
Address:	8621 Zamárdi, Szent István utca 3512. hrsz.
Responsible person:	Geiger Balázs
Phone:	+36 30 883 85 72
E-mail address:	<a href="mailto:reservation@mirabellacamping.hu">reservation@mirabellacamping.hu</a>

Name:	Thermal Camping
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**Club Pannon Camps & Hotels Kft**  
7625 Pécs Hunyadi utca 19.

Address:	8749 Zalakaros Gyógyfürdő tér 6.
Responsible person:	Kovács Margit
Phone:	+36 30 294 09 97
E-mail address:	<a href="mailto:reservation@karoscamping.hu">reservation@karoscamping.hu</a>
Name:	Hotel Platán
Address:	8621 Zamárdi, Damjanich János utca 2/B.
Responsible person:	Balázs Geiger
Phone:	+36 30 742 2156
E-mail address:	<a href="mailto:reservation@platan-hotel.hu">reservation@platan-hotel.hu</a>

## 1.2. Contact details of the Data Protection Officer

Data Protection Officer:	Szilárd Tóth
Phone:	+36 30 411 5217
E-mail address:	<a href="mailto:szilard.toth@itjump.hu">szilard.toth@itjump.hu</a>

## 2. Rules relating to the lawfulness of data processing

### 2.1. General principles

*The Organization's* data are stored in a form which permits the identification of Data Subjects for the purposes for which the personal data are processed, in accordance with the legal bases assigned to the purposes and for the time necessary to comply with the principles laid down in the legal environment.

At the same time, as a data controller, you must do your utmost to protect the data you store and process. The principles and expectations with regard to which the risk of data breaches can be minimised must be applied to the Data Processors used in the processing.

### 2.2. Legal basis

#### 2.2.1. Consent

The data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes. Consent may be direct, in cases where the data subject has given his or her consent directly to the controller, knowing the purposes of the processing. Indirect, where the data subject has not given consent to the specific controller, but to a controller who may market or transfer the data subject's personal data on the basis of the consent.

### ***2.2.2. Consent related to children and special data***

The organisation processes personal data relating to children only to a limited extent, given the scope of its activities and the purposes for which the data are processed. Where this arises in any specific case, the management of personal data of children under the age of 16 may only be started with verifiable and documented parental consent in accordance with the rules set out in Article 8 of the EU Regulation.

### ***2.2.3. Contract based data processing***

The processing is necessary for the performance of a contract to which the data subject is a party or for taking steps at the request of the data subject prior to entering into the contract.

### ***2.2.4. Data processing that can be traced back to legislation***

The processing is necessary for the fulfilment of a legal obligation to which the controller is subject, and the storage and processing of personal data stored on this basis must follow changes in the legal environment and, if necessary, the controller shall inform the data subject of the change of legal basis.

### ***2.2.5. Legitimate interest of the controller or a third party***

The processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party, except where those interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child.

The Data Controller shall carry out a balancing of interests test for data processed pursuant to Article 6(1)(f) of the Regulation as follows:

During the balancing of interests test, the Data Controller:

- identifies his or her legitimate interest in the processing of the personal data subject to the balancing of interests test,
- establishes the interests of the Organisation in relation to the personal data of the data subject which form the basis of the balancing test, as a counterweight to the legitimate interests of the Data Controller,
- carry out an assessment of its legitimate interests and the legitimate interests and fundamental rights of the data subject and, on that basis, determine whether the personal data can be processed.
- A related special right of the data subject is the RIGHT TO OBJECT.

## **3. Rights of data subjects**

The principal senior officer of the Organisation shall ensure that the Data Subject is able to exercise his or her rights under the EU Regulation and national law in relation to the data processed by the Organisation. Data Subjects may exercise their rights by means of a simplified written request. The Controller shall inform the Data Subject of the action taken on the request without undue delay and in any event within 30 days of receipt of the request. If necessary, taking into account the complexity of the request and the number of requests, this time limit may be extended by a further 60 days. The Data Controller shall inform the Data Subject of the

extension of the time limit within 30 days of receipt of the request, stating the reasons for the delay. If the Data Subject has submitted the request by electronic means, the information shall be provided by electronic means where possible, unless the Data Subject requests otherwise. The information provided to the Data Subject, upon his/her request, shall include, except in the case of limitations, the identification of the data processed and its source, the purposes, legal basis and duration of the processing, the name of the Data Protection Officer of the organisation and his/her contact details. Upon specific request, the Data Controller shall inform the Data Subject of the data of the Processors and Recipients. The Data Subject may exercise his or her fundamental rights free of charge, but may be further charged for the actual and proportionate costs incurred.

In the case of a joint controller, the rectification, blocking or erasure of data shall be communicated to all data subjects concerned by the processing and to the Recipients to whom the data are transferred by the Controller in accordance with the Data Transfer Policy.

### **3.1.Consent (withdrawal)**

The data subject's consent may only be sought by the controller where there is a clear purpose and where it can be demonstrated that the data subject has given his or her consent. If, in the case of any Data Subject, the Data Subject wishes to exercise the right of withdrawal or re-consent on the legal basis of consent, he or she may notify the controller in writing of his or her intention to do so.

### **3.2.Right of access (inspection)**

The principal senior officer of the Organisation shall ensure that the Data Subject (who may be a member, officer or employee of the Organisation) has access to the data processed by the Organisation. Access may be granted to the Data Subject in two ways.

The Organization will make the processed data available electronically, subject to the location and conditions set by the Data Controller.

The Organization provides the processed data to the Data Subject in electronic form (electronically authenticated), sends it in the form of electronic information.

The electronic information is free of charge if the person requesting the information has not yet submitted an information request for the same processing in the calendar year in question. In all other cases, the Organisation may charge a fee proportionate to the cost.

### **3.3.Right and obligation to rectify**

The Data Subject may request information from the Organization about the processing of his or her personal data, and request the rectification of his or her personal data.

### **3.4.Right to erasure, right to be forgotten**

The Data Subject may request the deletion or blocking of his or her data, except in the case of mandatory data processing requirements under the conditions set out in the legal environment. Deletion may not only mean a limitation of the presentation, it may mean the real physical deletion or an irretrievable overwriting.

The request for cancellation or deletion must be documented and complied with if

- the processing is unlawful,

- the Data Subject requests it and the legal basis for the processing allows erasure on request
- the data are incomplete or inaccurate and cannot be lawfully rectified, provided that the legal basis for the processing allows erasure on request
- the time limit relating to the legal ground for the processing has expired
- ordered by a court or competent authority.

### **3.5.Right to restrict processing**

The Data Subject may request the restriction of the processing of his or her personal data processed, except for the mandatory processing requirements of the conditions set out in the legal environment. In this case, the storage of the data shall continue, but the processing may not be carried out.

### **3.6.Right to data portability**

One copy is free of charge, but the Data Controller may charge for any costs incurred.

### **3.7.Right to object**

With respect to the exercise of the Data Subject's rights, he or she may only object to the processing of a task carried out in the public interest and to processing (transfer) on the basis of a legal ground qualified as legitimate interest by the Data Controller.

- The *Organisation* shall examine the objection within the shortest possible time from the date of the request, but not later than 15 days, and shall decide whether the objection is well-founded and inform the applicant in writing of its decision.
- If the objection is justified, the *Organization* is obliged to suspend the processing (further data collection, data transfer) and to block the data, and to notify the objection and the measures taken on the basis of the objection to all those to whom the personal data concerned by the objection were previously transferred and who are obliged to take measures to enforce the right to object.
- If the Data Subject does not agree with the decision taken as a result of the assessment of his or her objection, or if the *Organisation* has failed to comply with the time limit, the Data Subject may, within 30 days of the notification of the decision or the last day of the time limit, take the matter to court in the manner provided for by applicable law.

### **3.8.Information for Data Subjects**

The Data Subject shall be informed before the processing of the data in accordance with Article 20 of the Data Protection Act. This information may be provided individually in writing or in the form of an information notice on the "data processing" section of the *Organisation's* website.

## 4. The organisation's data management processes

### 4.1. Club Pannon Camps & Hotels Ltd.'s data management processes related to accommodation services

Club Pannon Camps & Hotels Ltd. operates the accommodation units

Aranypart Camping	8600 Siófok, Szent László utca 183-185.
Mirabella Camping	8621 Zamárdi, Szent István utca 3512. hrsz.
Thermal Camping	8749 Zalakaros Gyógyfürdő tér 6.
Hotel Platán	8621 Zamárdi, Damjanich János utca 2/B.

as four independent organisational units. Each unit has an independent manager and an independent organisational structure. Each unit has its own management and data management, with central commercial and administrative control.

The units manage their data independently, but on the same database platform. Each unit has its own website and the administration of the website is centralised.

The channel manager of PHOBS d.o.o. ensures the contact with the websites that sell the accommodation by offering the services provided to the portals that sell the accommodation with whom the data controller has a direct contract. The contracted partners, as data controllers, have control over the data of the guests registering on their own portals and only provide Club Pannon Camps & Hotels Kft. with the data that describe the services and accommodation offered by the organisation. They are transferred to the possession of the accommodation facilities operated by Club Pannon Camps & Hotels Kft. after the booking. In the course of the processing of the data received, Club Pannon Camps & Hotels Kft. becomes the data controller, i.e. the data received are those which form part of the data property of the data controller and for the processing of which it is responsible as the data controller.

### 4.2. Request a quote

**Purpose:** To provide the data subject requesting the offer with the relevant information in a timely and appropriate manner in order to conclude the contract.

**Legal basis:** Article 6(1)(b) of the Regulation, necessary to take steps at the request of the data subject prior to the conclusion of the contract,

**Categories of persons concerned:** Customers

**Source of personal data:**

**Categories of personal data processed:**

- Identity-related data
- Contact details,
- Parameters of services to be used (date, number of persons, age group)

**Intended data storage period:** validity period of the offer

**Recipient of transmission to a third country:** no transmission

**Enforceability of rights:** Upon written request by the data subject, the data controller shall perform it.

### 4.3. Room and accommodation booking services on own website

Using the data controller's IT system via the Internet

**Purpose of the processing:** to ensure the sale of the accommodation services by booking, to ensure the enforceability of the commitment made. The data subjects record their own data and the data of the natural persons arriving with them directly on the websites of the data controller. In addition to the provision of personal data, the Data Subject must of course choose the period of use of the accommodation, the services to be provided and the payment methods to be used.

The personal data is stored on the website, in a website database, from where it is transferred to the database of the data controller.

**Legal basis:** Article 6(1)(b) of the Regulation (processing necessary for the performance of a contract)

**Affected categories:** customers

**Categories of personal data processed:**

- Identity-related data
- Contact details
- Parameters (date, number of persons, age group) of the services to be requested
- Identification data
- Economic, financial data

**Recipient categories:** no forwarding

**Planned data retention period:** 5 years from the date of submission of the reservation for completed uncancelled reservations

**Forwarding to a third country:** no forwarding

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

### 4.4. Booking of rooms and accommodation services on a website independent of the data controller

Using the IT system of a contracted partner e.g. **Expedia, Booking.com and Szállás.hu**

The purpose of the recording of data is to ensure the sale of the accommodation services by reservation, to ensure the enforceability of the commitment made. The legal basis for processing is the legitimate interest of the Data Controller or a third party. In the case of reservations initiated in the system of the contracted partners, the recorded data will be transferred to the IT system of Club Pannon Camps & Hotels Ltd. The rules concerning the data processing procedures in the system of the contracted (intermediary) partner offering the booking possibility can be found in the data processing information of the intermediary partner. After receipt of the data, Club Pannon Camps & Hotels Kft. is considered as an independent data controller.

**Legal basis:** Article 6(1)(b) of the Regulation (processing necessary for the performance of a contract)

**Affected categories:** customers

**Categories of personal data processed:**

- Identity-related data

- Contact details
- Parameters (date, number of persons, age group) of the services to be requested
- Identification data
- Economic, financial data

**Recipient categories:** no forwarding

**Planned data retention period:** 5 years from the date of submission of the reservation for completed, uncanceled reservations.

**Forwarding to a third country:** no forwarding.

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

#### 4.5. Online, offline login

Pursuant to Section 9/H (1) of the Tourism Act, the accommodation provider - in order to protect the rights, safety and property of the person concerned and others, and to monitor compliance with the provisions on the stay of third-country nationals and persons enjoying the right of free movement and residence.

**Legal basis:** Article 6(1)(c) of the Regulation (Legal basis)

**Affected categories:** customers

**Categories of personal data processed:**

- Identity-related data
- Contact details,
- Copy of a document proving identity
- Parameters of services requested (date, number of persons, age group)
- Economic, financial data

**Forwarding to a third country:** no forwarding

**Intended data retention period:** the accommodation provider shall keep the data of the accommodation user until the last day of the first year following the year in which the data become known to the accommodation provider, until the expiry of the retention period specified by law.

#### 4.6. Payment by credit card

**Purpose of processing:** the purpose of processing the credit card data is to secure the reservation and to retrieve the total amount of the reservation or part of it, subject to cancellation.

**Legal basis:** Article 6(1)(b) of the Regulation, pending completion of the contract.

**Affected categories:** customers

**Categories of personal data processed:**

- data related to identification
- economic, financial data

**Transmission to a third country:** no forwarding

**Planned data storage period:** until the contract is completed.

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

#### **4.7. Billing-related data processing**

**Purpose of data processing:** to fulfil the data reporting obligations imposed by the accounting and tax legislation.

**Legal basis:** Article 6(1)(c) of the Regulation (Legal basis in law)

**Affected categories:** customers

**Categories of personal data processed:**

- Identity-related data
- Contact details,
- Economic, financial data

**Forwarding to a third country:** no forwarding.

**Planned data storage period:** until the contract is completed.

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

#### **4.8. Regular customer register**

**Purpose of data processing:** to increase the trust of data subjects who regularly return to the data controller by offering discounts.

**Legal basis:** Article 6(1)(a) of the Regulation (Consent)

**Affected categories:** customers

**Categories of personal data processed:**

- Identity-related data
- Contact details

**Forwarding to a third country:** no forwarding.

**Intended data retention period:** until consent is withdrawn.

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

#### **4.9. Data processing on social networking sites**

(Facebook, Instagram, Messenger, WhatsApp, YouTube)

**Purpose:** Marketing activities on the social platform have a noticeable impact on the use of services and bookings. The presence and active behaviour of the Organisation is for marketing purposes. The uploading of photos and event data involves the uploading of personal data to the Organization's social networking sites.

With regard to data management, particular care must be taken to ensure that staff members provide specific information to data subjects during the photo shoot and that no photo is taken which could inadvertently identify the person using the badge to protest against the photo shoot. In cases in which any data subject identifies him/herself or a legally represented minor child on the social networking sites of Club Pannon Camps & Hotels Ltd., he/she may subsequently request the deletion of the photo or the anonymisation of the

person in the photo. In other words, they may object to the processing of data on the basis of legitimate interest.

**Legal basis:** Article 6(1)(f) of the Regulation (Legitimate interest of the controller or a third party)

**Categories of persons concerned:** Employees, customers

**Source of personal data:** directly from the data subject

**Categories of personal data processed:**

- Image recording

**Intended data retention period:** 5 years or the lapse of marketing power of the event, which may not exceed 5 years.

**Enforceability of rights:** Upon written request by the data subject, the data controller shall perform it.

#### 4.10. Providing subscription options on social networking sites

(Facebook, Twitter, Instagram)

**Purpose of the processing:** to ensure the visibility of the accommodation operated by the Company through direct contact with customers.

**Legal basis:** Article 6(1)(a) of the Regulation (Consent)

**Affected categories:** customers

**Categories of personal data processed:**

- Electronic contact details
- Other personal data disclosed by the data subject

**Forwarding to recipients:** no forwarding.

**Intended data retention period:** until consent is withdrawn.

**Recipient of transmission to a third country:** No transmission.

**Enforceability of rights:** Upon written request by the data subject, the data controller shall perform it.

#### 4.11. Data processing related to the operation of a website chatbot

(Meta - Messenger; Meta - WhatsApp; Viber; Telegram; Google Business Chat)

**Purpose:** To provide a customer-initiated online communication channel to ensure that the person concerned receives a rapid response to their queries in line with their needs. The online contact is initiated by the data subject and the fact of consent can only be proven by a message from the data subject.

**Legal basis:** Article 6(1)(a) of the Regulation (Consent)

**Categories of persons concerned:** Customers, potential customers.

**Source of personal data:** directly from the data subject.

**Categories of personal data processed:**

- identification data
- other data to be provided by the data subject

**Intended data retention period:** until consent is withdrawn.

**Recipient of transmission to a third country:** no transfer.

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

#### 4.12. Data management related to the organisation of events

(Data processing of organisers and contacts of school trips, other private and company events)

**Purpose of data management:** to adapt the services requested to the needs of the customer and to effectively inform the data subject of any changes.

**Legal basis:** Article 6(1)(a) of the Regulation (Processing necessary for the performance of the contract).

**Categories of data subjects:** customers (data subjects in charge of contact management for event customers).

**Categories of personal data processed:**

- Identity-related data
- Contact details

**Planned data retention period:** 30 days after completion of the contract.

**Recipient of transmission to a third country:** no transfer.

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

#### 4.13. Data management related to the organisation of events

(data processing to enable the production of an invoice)

**Purpose of processing:** to fulfil the tasks related to the fulfilment and control of the financial, accounting and tax obligations of the data controller.

**Legal basis:** Article 6(1)(c) of the Regulation (Legal basis)

**Affected categories:** customers

**Categories of personal data processed:**

- Identity-related data
- Contact details
- Identification data
- Economic, financial data

**Planned data storage period:** until the end of the 8th year following the date of the accounting document.

**Recipient of transmission to a third country:** no transfer.

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

#### 4.14. Data management in relation to complaint handling

**Purpose of processing:** to comply with Article 17/A (7) of Act CLV of 1997 on Consumer Protection.

**Legal basis:** Article 6(1)(c) of the Regulation (Legal basis)

**Affected categories:** customers

**Categories of personal data processed:**

- Identity-related data
- Contact details

**Forwarding to recipients:** authorities and supervisory bodies

**Forwarding to a third country:** no forwarding

**Planned data retention period:** limitation and enforcement period, 5 years.

**Recipient of transmission to a third country:** no transfer.

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

#### 4.15. Safeguarding data management rights during a photo session

##### Legal background:

A photograph taken of a natural person is personal data within the meaning of the GDPR, so the taking of the photograph and the operations carried out on it constitute processing [see Article 4(1) and (2) GDPR].

Article 12 of the GDPR lays down general expectations as regards the provision of information to the data subject, according to which the data controller must make every effort to provide all information in a concise, transparent, understandable and easily accessible form, in clear and plain language. The information should be provided in writing or by other means, including electronic means, and may be provided orally at the request of the data subject where appropriate. The information may also be supplemented by standardised icons in order to provide the data subject with information on the envisaged processing in a prominent and easily understandable form.

The processing of personal data (the taking of photographs) for journalistic, scientific or artistic purposes is treated slightly differently from the general rules. For these, Article 85 of the GDPR allows Member States' legislation to provide for exceptions or derogations from the GDPR rules. Therefore, Section 2:48(2) of Act V of 2013 on the Civil Code (Civil Code) on the right to an image, which states that the consent of the data subject is not required for the taking of the photograph and the use of the prepared photograph in the case of publicity and public appearances, may continue to be applicable.

In addition to the pictograms warning of the camera system, pictograms warning of photography have been placed at the external entrances of the accommodation and inside the property.

Three different data controllers can take photos:

**Visitors** who use the services of the accommodation and can take photos with their own equipment. In this case, the natural person who takes the photo is responsible for the processing of the data in accordance with the rules laid down in the Regulation or specified in the (national) legal environment of the Member State. The organisation operating the facility cannot be held responsible for his/her actions.

Photography **for journalistic, scientific or artistic purposes** may only be carried out by a person with an authorised badge. If he/she does not wear a badge indicating this fact,

he/she shall automatically be considered as a private person and the photograph taken shall be used for private purposes only.

**Photos taken on behalf of Club Pannon Camps & Hotels Kft:**

**Purpose of processing:** visual representation of the data controller's activities and services for marketing purposes.

The photographer who uses the badge of Club Pannon Camps & Hotels Ltd. during the photo shoot on behalf of the Organization, takes pictures for marketing purposes or for the purpose of recording historical events. The Photos may be posted on the Organization's social media pages or website, newsletter or other publications for marketing purposes after the metadata has been modified.

Natural persons journalists, photographers taking photos and persons taking photographs on behalf of the Organisation must clearly avoid the appearance of persons in the photographs who do not wish to appear in the photographs for marketing purposes.

Photography pictograms, both inside and outside the accommodation facilities, which are also displayed on the website and provide clear information within the privacy menu points of the Organization's websites, remind guests that the data controller may take photographs during their reservation and while visiting the accommodation facility on the basis of a legitimate interest. If the data subject notices and identifies his or her objection during the taking of the photograph or after the publication of the photograph, the data controller will endeavour to meet the objection as far as possible and to destroy the photograph if possible.

**Legal basis:** Article 6(1)(f) of the Regulation (Legitimate interest of the data controller or a third party)

**Categories of persons concerned:** employees, customers.

**Source of personal data:** directly from the data subject.

**Categories of personal data processed:**

- Images taken

**Planned data retention period:** 5 years

**Recipient of transmission to a third country:** no transfer.

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

## 5. Data management of camera systems:

The operation of the camera system is governed by a separate camera operating policy for each site. The policy includes a map of the camera system and deletion and recording rules for continuous recording without audio recording. All camera-equipped facilities of the data controller have indoor and outdoor cameras. The primary objective for the placement of cameras is the protection of property. Each organizational unit shall store recordings on its own local data storage, and the rights to review recordings shall be set out in the policy. To ensure continuous recording, pictograms are placed on the outside of entrances and in all rooms monitored by cameras within the property to alert guests to the operation of the camera system. Recordings are automatically deleted after 8 days.

**Legal basis:** Article 6(1)(f) of the Regulation (Legitimate interest of the data controller or a third party)

**Categories of persons concerned:** employees, customers.

**Source of personal data:** directly from the data subject.

**Categories of personal data processed:**

- Image taken

**Planned data retention period:** 8 days.

**Recipient of transmission to a third country:** no forwarding.

**Enforceability of rights:** upon written request by the data subject, the data controller shall perform it.

## 6. Website functions and data management related to the website

### 6.1. Websites operated by Club Pannon Camps & Hotels Ltd.

<https://aranypartcamping.hu>

<https://mirabellacamping.hu>

<https://karoscamping.hu/>

<https://platan-hotel.hu/>

### 6.2. General data protection information about the operation of the website

DATA PROCESSED: When visiting the portal, we may record on the server the Data Subject's network identity for security reasons: his/her IP address and the software environment used by the Data Subject, as well as the time of his/her visit and the address of the pages viewed. This data is stored in electronic format on our server, and after 30 days only in aggregate form.

During your visit, you may receive a control file (cookie) from our website and an external, independent auditing service (Google Analytics) that measures the number of visitors to our site. Accepting cookies is not mandatory (you can disable them in your browser), but some of our services can only be used if you accept them.

### 6.3. General information about cookies

A cookie is a piece of data that the visited website sends to the visitor's browser (in the form of a variable name value) so that it can store it and later load its content on the same website. A cookie can be valid until the browser is closed, or indefinitely. In subsequent HTTP(S) requests, the browser will also send this data to the server.

The point of a cookie is that website services inherently need to be able to identify a user (e.g. that they have entered the site) and manage them accordingly. The risk is that the user may not always be aware of this and may be tracked by the website operator or

other service provider whose content is embedded in the site (e.g. Facebook, Google Analytics), in which case the cookie content may be considered personal data.

## **6.4.Types of cookies used by websites:**

### **Setting permissions**

The website uses cookies to ensure efficient navigation and the operation of certain functions. Detailed information about cookies is provided below under each category.

Cookies categorised as "Necessary" are stored by the browser as they are essential to the basic functionality of the website.

Third-party cookies help us to analyse your use of the website, store your preferences and provide you with relevant content and ads. These cookies are only stored on your browser with your prior consent.

You can choose to enable or disable these cookies, but disabling certain cookies may affect your browsing experience.

### **Required**

The necessary cookies are crucial to the essential functionality of the website and the website will not function properly without them. These cookies do not store personally identifiable information.

### **Functional (switchable)**

Functional cookies help us to perform certain functions, such as sharing website content on social media platforms, collecting feedback and other third-party functions.

### **Analytics (switchable)**

Analytics cookies are used by websites to help the data controller understand how visitors interact with the website. These cookies provide information about the number of visitors, bounce rate, traffic source, etc.

### **Performance**

The performance cookies are used by the data controller to understand and analyse key performance indicators of the website, which contribute to a better user experience for visitors.

### **Advertisement (switchable)**

Advertising cookies are used by the data controller to serve visitors with personalised ads based on the pages they have previously visited and to analyse the effectiveness of advertising campaigns.

**PURPOSE OF THE DATA MANAGEMENT:** The data automatically recorded by the server is temporarily stored for the secure operation of the server. All other data is recorded for the purpose of operating the services and identifying users.

**DURATION OF DATA MANAGEMENT:** The data provided voluntarily by the Data Subject will be kept until the Data Subject requests its deletion. The data automatically recorded by the server are available to us for 30 days, after which they are only kept in aggregate form as visitor statistics.

## 7. Third country provisions

Club Pannon Camps & Hotels Ltd. does not transfer personal data to third country data controllers, data processors, other recipients or international organisations.

No third country data controller or processor has been identified in its data processor relationships or by its subcontractors. Club Pannon Camps & Hotels Ltd. has reminded its data processors that they are required to notify the data controller before starting any processing activities in a third country and to demonstrate that the level of protection of natural persons in the EU provided by this Regulation will not be affected. Transfers to third countries and international organisations can only be made in full compliance with the EU GDPR Regulation. The transfer may only take place if the data controller or processor complies with the conditions for transfer to third countries or international organisations set out in this Regulation, subject to the other provisions of this Regulation.

## 8. Data processors

Accounting services	COMET-TAX Számviteli és Szolgáltató Kft. 7625 Pécs Hunyadi u. 19.
	ProfitConto Hungary Könyvelő, Tanácsadó Kft. 7622 Pécs Liszt Ferenc u. 3 fszt 1.
Technical inspection, analysis	VMV HOLDING Ingatlankezelő Kft 8621 Zamárdi, Kossuth Lajos utca 24
Legal advice	Dr. Wartig Ügyvédi Iroda (Law Firm) 7625 Pécs Hunyadi u. 19.
Legal advice	Dr. Varga Ügyvédi Iroda (Law Firm) 7625 Pécs Hunyadi u. 19.
IT operations	Isys Business Solution Kft. 7629 Pécs, Aknász utca 26.

Web developer	Amadé AMADÉ KREATÍV BT. 7621 Pécs, Megye utca 8-10. fszt. 3.
Service sales	Honlapkészítő Kft. 1125 Budapest, Diós árok 60. fszt. 4.
Sale of services	PANNON-SERVUS Idegenforgalmi és Egyéb Szolgáltató Korlátolt Felelősségű Társaság (Travel Agency) MT-HostWare Számítástechnikai Kft. JETCAMP Cbooking.Com Szállás.hu camping.info PITCHUP CAMPING VISION ACSI PINCAMP D-Edge (Direct Commercial Representative of D- EDGE SAS in Hungary)

## 9. Remedies available to the data subject

If the data subject suffers damage to his or her rights in connection with the processing of his or her personal data, he or she may exercise his or her remedy rights:

- He/she may request information about the processing of his/her personal data and request the rectification of his/her personal data.
- With regard to data processed on the legal basis of consent, he/she may request the erasure of personal data or withdraw his/her consent. Withdrawal of consent affects the future use of the data in question and does not affect the lawful processing of the data prior to the withdrawal.
- Upon request, the company will provide information about his/her data managed and processed by the company, the purpose, legal basis and duration of the processing.
- The Company shall erase the personal data of the data subject if the processing is unlawful, if the data subject requests it, if the purpose of the processing has ceased to exist, if the data is incomplete or inaccurate and cannot be lawfully rectified, provided that erasure is not prohibited by law, or if the statutory time limit for the storage of the data has expired or has been ordered by a court or the Data Protection Officer.
- The Data Subject shall have the right to obtain from the Data Controller, at his or her request, the restriction of processing if one of the following conditions is met:
  - the data subject contests the accuracy of the personal data, in which case the restriction applies for the period of time necessary to allow the data controller to verify the accuracy of the personal data;
  - the processing is unlawful and the Data Subject opposes the erasure of the data and requests instead the restriction of their use;

- the Data Controller no longer needs the personal data for the purposes of processing, but the Data Subject requires them for the establishment, exercise or defence of legal claims.
- He/she can exercise his/her 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 a Data Controller in a structured, commonly used, machine-readable format and the right to transmit such data to another Data Controller without hindrance from the Data Controller to which he or she has provided the personal data.
- He/she can exercise his/her right to object. If the data controller has established the legal basis for the processing for the purposes of the legitimate interests pursued by the controller or by a third party.

Complaints against possible infringements by the data controller can be lodged with the National Authority for Data Protection and Freedom of Information:

National Authority for Data Protection and Freedom of Information

1055 Budapest, Falk Miksa utca 9-11.

Address for correspondence: 1374 Budapest, Pf. 603.

E-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

Independently of the right to lodge a complaint, the data subject may also take legal action against the unlawful processing of his or her personal data or the infringement of his or her rights relating to the right to information self-determination. In Hungary, the action may be brought before the competent court of the place of residence or domicile of the data subject or before the competent court of the place where the data controller is established. You can find the court of the place of residence or stay at <https://birosag.hu/birosag-kereso>.

Budapest, 1<sup>st</sup> November 2023