

The Privacy Policy of the website operator for orchideahotel.hu

This privacy statement contains regulations concerning the protection, management and processing of users' personal data by the intermediary service provider (hereinafter: the website operator) on its portal www.orchideahotel.hu (including private forums) and in its interactive and other services (collectively: services).

THE CONTROLLER'S PERSONAL DATA:

Controller's name: PRO-OPPIDO Kft.

Representative: Teodóra Tóthné Farkas

Headquarters: 9233 Lipót, Rákóczi u. 42.-44.

Tax number: 12506345-2-08

Company registration number: 08-09-008996

The controller's website: www.orchideahotel.hu

Contact: info@orchideahotel.hu

The privacy statement is accessible online on the website <http://www.orchideahotel.hu> under the menu item "Privacy Statement".

Data controller

DATA PROCESSING

In case of registered users on the website, the data processing is carried out according to the users' voluntary consent after they have been directly and thoroughly informed.

Legal basis of data processing: users voluntary consent in accordance with Section 5 paragraph (1) a) of Act CXII of 2011 on Informational Self-Determination and Freedom of Information.

The website operator is tasked with operating the servers and ensuring that technical background services are running smoothly. By starting to use the services, the user accepts the conditions of the Privacy Statement. The Privacy

Statement is available at all times on the registration interface of the service. As for the personal data which is managed in connection with the service, the data controller is the website operator itself, who does not work with a data processor. The users' personal data is stored on the servers of the website operator. Personal data is managed only for specific purposes, in order to exercise certain rights or fulfill obligations, to the minimum degree and time as required to achieve the purposes.

Personal data provided in connection with the service is managed only until termination of the legal relationship with the user. Subsequently, within 8 days the data provided by the former user will be deleted, and the personal data will be made anonymous for use in statistics.

The personal data managed by the website operator can only be accessed by the operator's employees. In the course of data processing, the website operator always acts according to the Hungarian law in force.

THE PURPOSE OF DATA PROCESSING

The primary purpose of data processing by the website operator is to ensure that its services are effective, safe and personalized. Further service objectives of the data processing by the website operator include identifying registered users, settling disputes that arose during use of their services, providing information to the users, cooperating in resolving operational and service problems, and securing the rights of the website operator.

The processing of data is done by the website operator ethically and legally; its collection is carried out for specific, clear and legal purposes, and its further management is not continued for purposes which do not meet the aforementioned ones. In the course of data collection and further management, the operator makes certain that the personal data is appropriate for the purpose of their collection and/or management, that it is relevant and is not excessive; during its collection and management, the operator makes sure that the data is accurate, and if necessary, relevant as well; the operator takes all the reasonable actions to delete or correct faulty or incomplete data, taking the purposes of its collection or further management into account. Data is stored in such a way that users can only be identified during a limited timeframe, only as long as necessary for the purposes of data collection and further management. By accepting the Privacy Statement, users consent to data

processing by the website operator carried out for the aforementioned purposes.

Pro Oppido Kft. manages the data of those natural persons who are among their clients and partners based on this current privacy policy, which is to be interpreted in accordance with Pro Oppido's own data protection and management statements.

The legal basis for data processing

When users request quotations or send business proposals to Pro Oppido Kft., this is seen as an expression of their voluntary consent to the privacy policies laid out here. [Section 5 paragraph (1) a) of Informational Self-Determination Act]

The purpose of data management: Pro Oppido Kft. manages the personal data received from directly or indirectly incoming documents for their main activity as well as in order to provide the necessary services, especially to promote business transactions with their own contractual partners and business parties and to carry these out smoothly and in an appropriate manner.

The scope of processed data

Surname, first name, gender, date of birth, e-mail address, phone number, as well as any other personal data/information which was listed voluntarily by the user.

Statement about using IT support

On behalf of the data controller, the technical aspects of digital data storage are managed by the following companies as hosting service providers for the company:

MT-Hostware Kft.

Headquarters: 1149 Budapest, Róna u. 120-122.

Representative: György Lehel

Creative Management Kft.

Headquarters: 8200 Veszprém, Boksa tér 1. Building A

Representative: Zoltán Gál

Persons with access to the data

Pro Oppido Kft. uses the data solely for the purpose of carrying out its activities. We would like to express that the persons who have an employment relationship or who are in a contract of engagement with our company can access the users' data only for the purposes of data processing.

REGISTRATION

The data given voluntarily by the users about themselves can also be used in the users' profiles for marketing and advertising purposes. In the framework of the personalized service, the website operator is entitled to use the users' individual profiles to send suitable offers to the users via advertisements which match their profiles. The website operator complies with all the provisions of Act LVIII of 1997 on business advertising activities.

The website operator provides users with the opportunity to correspond with service providers and to indicate their own interests. This way, the website operator can send messages for the purposes of marketing and advertisement to the users based on their submitted preferences and data.

Using the services is also possible to a limited extent without registration ("usage without entering personally identifiable information").

In accordance with the purpose limitation principle, information that is required during the registration process is limited to that which is essential for the secure and lawful access or use of a service. The required pieces of information, which are especially essential for identifying the user, are

surname;

first name;

e-mail address.

Users always have the right to not give certain pieces of information about themselves. Providing data is always voluntary. This circumstance, however, might mean that the user cannot access certain services.

The website operator operates the services based on Section 13/A of Act CVIII of 2001 on the principle of data avoidance and data economy. During use of the service, some user data is automatically managed by the website operator.

Some data and IP addresses connected to the service users' computers are logged in order to generate data about website views and to detect possible errors and attempted attacks. Some of this data is considered personal, so it is managed in accordance with the laws in force.

Statistics are generated from the log files. The monthly log files are stored for a year on the server of the website operator in order to determine, for example, which part of the website is visited the most and how often by the users, and how much time they spend on the website on one occasion, and then, they are deleted. The IP addresses of the users are not connected to any data, based on which the person of the user could be identified.

OTHER REGULATIONS

In the absence of any express statutory provisions, the website operator may only give personally identifiable data to a third party if the users give their explicit consent. If any doubtful or illegal activities are detected, the website operator is entitled to send notices or announcements, or to make them available even by using the user's data. The operator is entitled to delete any unlawful or probably unlawful comments, ratings, posts or contents without prior notice. The website operator, as service provider, is not obliged to check the content of data which they forwarded, stored or made available.

Furthermore, they are not obliged to look for such facts or conditions which refer to the pursuit of unlawful activities.

The website operator implements security measures at all times which are in line with industry standards, but because of the fast changes and development of technology, it cannot be guaranteed that personal data of users related to or displayed in connection with the service will be used according to the ways that are defined in the Privacy Policy. Third parties or other users may also have the ability to illegally monitor or bug messages and data, which are protected by laws on privacy and personal rights. Users may also give their personal data to a third party in a manner that is permitted by this Privacy Policy, who can use it for an illegal purpose or in an illegal manner. In all of these cases the liability of the website operator is excluded.

Based on Section 13/A of Act CVIII of 2001 on Certain Issues of Electronic Commerce Activities and Information Society Services, the website operator is entitled to manage certain personal data, including billing and traffic data, even in the absence of the user's explicit consent. The website operator can manage user data that is necessary and sufficient for identifying users for several purposes: to create, edit, monitor, and define the content of a contract for the provision of an information society service, to bill the fees arising from said contract, as well as to fulfill the claims connected to it. In order to bill the fees arising from the contract for providing an information society service, the website operator can manage personal data in connection with the use of information society services, which are necessary for determining the fee and for billing: in particular, data that refers to the date, time, and place of the service used. For the purpose of providing the service, personal data can be used that is technically essential for providing the service.

Based on Act C of 2003 on Electronic Communications, the internet access provider and other communications service providers are entitled to manage the users' personal and other data to a certain extent.

The users are solely responsible for using their personal ID and password and for the activities in connection with using the personal ID and password. For an enhanced level of safety, it is recommended to keep the identifier and the password connected to the user secret. In case the users reveal this data to a

third party, it can have the consequence that the users lose control of their data that is used by the website operator or other data processors in the framework of a service, and they can also be personally liable in legally binding transactions. In these cases, it is recommended to change the ID or the password immediately.

By using the service, the user and the website operator establish contact with each other through communication. Information is provided on an open network (internet). As a consequence, the website operator must meet certain monitoring and safety requirements. According to the current provisions of the data protection law, the website operator aims to make their service safe considering technical aspects and in order that the operator can take security measures which are in line with industry standards (for example using firewalls and in certain cases SSL or other encryption protocols). The operator takes appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, loss or alteration, its unauthorized disclosure and access, as well as all other unauthorized forms of data processing.

The website operator, as data processor, is obliged to give information to the users
about data managed by the website operator,
about the purposes and legal ground for data processing,
about its duration,
and about the persons who receive or received the data and why they received it.

The users have an absolute right to ask for information at our email address info@orchideahotel.hu. The deletion happens within 8 days after receiving and reading the email. Users who feel that the operator has violated their rights to the protection of personal data can assert their claim before a civil court and request assistance from a data protection supervisor.

The operator disclaims all his responsibility for data made public by the user in the framework of the service.

If the website operator obtains knowledge of the fact that the user infringed the regulations of the Privacy Policy, or that he made other individuals' personal data public in an unauthorized or unlawful manner during use of the service, then the website operator will take all the necessary legal actions to compensate for the damage caused, as well as to hold the person who violated the law legally liable.

If anyone uses personal or other information, publicly accessible within the service or unlawfully obtained, in such a way that it violates third parties' rights or regulations (for direct marketing purposes, etc.), or otherwise violates the regulations of this Privacy Policy, or causes such damage during use of the service, the website operator will take all necessary legal steps to compensate for the damage caused and hold the infringer responsible.

In case the website operator changes its Privacy Policy, it is obliged to make the changed Privacy Policy public on the website of its service. The changed Privacy Policy comes into force on the day of its publication.

COPYRIGHT AND OTHER RIGHTS:

Right holders (hereinafter: "the entitled") can call upon the website operator to remove information that is in violation of their rights by issuing a notice in the form of a private or public instrument providing full evidence of the violation, if:

-information published by the website operator (not including the standardized URLs connected to the published information) violates the rights of the entitled over their copyrighted works, performances, recordings, broadcasts, audiovisual works, or databases which are protected by copyright law, or

-if said information violates the exclusive rights of the entitled arising from trademark protection as defined in the law on the protection of trademarks and geographical indications. The notice should contain:

1. an indication of the subject matter and the facts that prove the violation of rights;
2. the data that is necessary to identify the infringing information;
3. the name, address, headquarters, phone number, and e-mail address of the entitled.

The website operator is obliged to conduct the proceedings specified in Section 13 of Act CVIII of 2001 complying with the conditions and rules defined within it.

Contact

Should you have any questions or complaints in connection with our website, you can contact PRO-OPPIDO Kft.:

E-mail address: info@orchideahotel.hu, phone number: +36 96-674-042

Hosting service provider:

Tárhely.Eu Kft.

Headquarters: 1144 Budapest, Ormánság utca 4., on the 10th floor, 241

Contact: support@tarhely.eu

Phone: +36 1 789 2 789

Other regulations

PRO-OPPIDO Kft. reserves the right to edit or change this statement without prior notice. The Hungarian legal system is applies to the present statement and to your use of the website.

Closed:

01.06. 2018

Teodóra Tóthné Farkas, manager