

# PRIVACY POLICY

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**on the data protection and data management principles and practices of Online Marketing Strategy Ltd.**

Online Marketing Strategy Ltd., as the operator of the **hotelhood.com** website (hereinafter: the “Website”), hereby publishes its data protection and data management principles for data management within the framework of the operation of the Website, which it acknowledges to be mandatory for itself.

By starting to use the Website, the users visiting the Website (hereinafter: User) accept all the terms and conditions contained in this Privacy Policy (hereinafter: Policy). Therefore, please read this Information carefully before using the Website and in particular providing information on each form.

Important note: this Privacy Policy is translated, and the original text was written according to the Hungarian and other international laws that are applicable to Online Marketing Strategy Ltd.

## 1 DATA CONTROLLER INFORMATION

The data controller is the Online Marketing Strategy Ltd. (hereinafter: Data Controller) operating the Website.

Headquarters: H-1039 Budapest, Pünkösdfürdő utca 52-54.

Company registration number: 01-09-276442

E-mail address: info@omstrategia.hu; support@hotelhood.com

The Data Controller is responsible for the development of this Policy, its full compliance with the persons covered by it, as well as for the control and implementation of the necessary changes. The current version of the Policy is available on the Website.

The partial processing of the data is performed by Webshop Marketing Kft. (H-4028 Debrecen, Kassai út 129.; Reg. Nr.: 09-09-024017) acting on behalf of the Data Controller. The Data Controller reserves the right to involve additional data processors in the data management in the future, of which it informs the Users by amending this Policy.

Users can provide information and data about themselves on the Website in two ways:

- Personal data expressly provided or made available when using the services of the Website (see point 2).
- Information provided to the Data Controller in connection with the use of the Website in connection with the visit to the Website and its use (see point 3).

## 2 MANAGEMENT OF DATA EXPRESSLY PROVIDED BY USERS

### 2.1 Scope of personal data processed

When requesting a **consultation**, Calendly's Privacy Policy applies, which is directly accessible from the Website.

**When contacting via the Website ("Contact" menu item), the following information is required (information marked with \* is required):**

- name\*
- e-mail address\*
- telephone number
- message\*

**When subscribing to any service package or ordering a book via the Website ("Order" button), the following information is required (information marked with \* is required):**

- first name\*
- last name\*
- company name
- street address\*
- town/city\*
- postcode\*
- telephone number\*
- e-mail address\*

**When asking for a consultation ("Schedule event" button), the following information is required (information marked with \* is required):**

- name\*
- e-mail address\*
- telephone number
- hotel website
- note
- telephone number for text reminder

This data is handled by Calendly and therefore the User has to consent to its Privacy Policy as well.

**When subscribing to a newsletter, the following information is required (information marked with \* is required):**

- e-mail address\*
- first name\*
- hotel type

**Only persons over the age of 16** are entitled to provide data on the Website.

### 2.2 Purpose of data management

The data controller uses the data defined above for the following purposes:

- **The purpose of handling the data provided during the contact** is to respond to the message sent by the User and to keep in touch. (Data management registration number: NAIH-94381/2016.)
- **The purpose of handling the data provided when subscribing to any service package or ordering a book through the Website** is to respond to the message sent by the User and to maintain the necessary contact, as well as to prepare the contract for the ordered package; and for the purpose of follow-up, a one-time electronic letter or telephone call about the HotelHood products and services of Online Marketing Strategy Ltd. (Data management registration number: NAIH-94381/2016.)
- **The purpose of handling the data provided during the request for a consultation** is to prepare for the consultation, to contact and keep in touch with the User for the purpose of consultation and consultation, to answer the User's questions and to follow online Marketing Strategy Ltd. to the address or telephone number provided by the data subject. (Data management registration number: NAIH-94381/2016.)
- **The purpose of processing the data provided during the subscription to the newsletter** is to send e-mails about the products, services, favorable offers and other promotions of Online Marketing Strategy Ltd. To the address provided by the data subject. (Data management registration number: NAIH-94381/2016.)

## 2.3 Duration of data management

The data controller handles the personal data if the purpose of the data processing exists or until the User requests the deletion of his data or withdraws his consent to the data processing. The duration of data processing for each purpose is as follows:

- **The data provided during the contact** will be handled by the Data Controller until the relevant User has received an answer to the questions asked during the contact or the other related administration has been completed.
- **The data provided in case of subscribing to any service package or ordering a book via the Website** will be managed by the Data Controller until the contractual process related to the service package with the affected User is completed, or the resulting contract(s) expire or are followed up.
- **The data provided during the provision of the billing data** will be handled by the Data Controller until the relevant User has received an answer to the questions asked during the contact or the other related administration has been completed.
- **The data provided during the request for consultation** will be processed by the Data Controller until the consultation process with the User concerned or the cooperation agreement concluded as a result thereof expires, or the follow-up takes place.
- **The data provided during the subscription to the newsletter** will be processed by the Data Controller until the User concerned requests the deletion of his data or withdraws his consent to receive such requests.

## 2.4 Legal basis for the processing of personal data

The processing of personal data is based on the User's voluntary consent given in the knowledge of this information. The User can give this consent by checking the relevant field before requesting a quote, sending a message, or subscribing to the newsletter.

In certain cases, the handling, storage, and transmission of a given set of data is made mandatory by law, a fact which the Data Controller notifies the data subjects separately in each case.

Users may only enter their own personal information on the Website. If they do not provide their own personal data, the data subject is obliged to obtain the data subject's consent.

## 2.5 Who can get to know the data?

Only the Data Controller and its employees, as well as the Data Processor (s) used by it, have the right to access personal data in accordance with the applicable legislation.

In the absence of an express legal provision, the Data Controller shall only transfer data suitable for personal identification to third parties with the express consent of the given User.

## 2.6 User rights in relation to the data processed

At the request of the User, the Data Controller shall provide information on the personal data processed by the User, their source, purpose, legal basis, duration, name, address and activities related to data processing, and - in case of transfer of personal data of the data subject - legal basis and recipient. The data controller shall respond in writing no later than within 25 (twenty-five) days from the receipt of the request.

User has the right to request the correction of his / her personal data (indicating the correct data) The Data Controller shall immediately perform the correction in his / her register and shall notify the data subject in writing.

In addition to the above, the user may at any time request the deletion or blocking of his data - in whole or in part free of charge, without giving reasons. Upon receipt of the cancellation request, the Data Controller shall immediately ensure the termination of the data processing and delete the User from its register.

Instead of deleting, the Data Controller will block the personal data if the User so requests or if, based on the information available to him, it can be assumed that the deletion would harm the legitimate interests of the User. Personal data blocked in this way may only be processed for as long as the purpose of the data processing, which precluded the deletion of personal data, exists.

The Data Controller accepts requests for information, rectification, blocking or deletion at the following contact details: H-1039 Budapest, Pünkösdfürdő utca 52-54. at the postal address or at the e-mail address support@hotelhood.com.

If the Data Controller does not comply with the User's request for rectification, blocking or deletion, he shall communicate in writing the factual and legal reasons for the rejection of the request for rectification, blocking or deletion within 25 days of receipt of the request. In the event of a rejection of a request for rectification, erasure or blocking, the Data Controller shall inform the User of the possibility of legal redress and recourse to the National Data Protection and Freedom of Information Authority.

The User may at any time decide that the Data Controller will no longer send him a newsletter. The User may withdraw his consent to receive the newsletters at any time free of charge, without justification and without restriction, by clicking on the unsubscribe at the bottom of the newsletters or at the e-mail address support@hotelhood.com; or the name of the company, 52-54. Pünkösdfürdő utca, H-1039 Budapest. in a letter sent to a postal address (indicating your exact personal details). Upon receipt of the unsubscribe request, the data controller immediately deletes the data of the unsubscribing User from the direct marketing database and no longer sends a newsletter to the User.

If the revocation of the consent only affects the data management for direct marketing purposes (sending a newsletter), the Data Controller shall immediately delete the User from the direct marketing

register and shall continue to process the data provided for other purposes (request for quotation, contact) through the Website.

The User may object to the processing of his personal data,

- if the processing or transfer of personal data is necessary only for the fulfillment of a legal obligation to the Data Controller or for the enforcement of the legitimate interests of the Data Controller, the data recipient or a third party, except in the case of mandatory data processing;
- if the use or transfer of personal data is for the purpose of direct business acquisition, public opinion polling or scientific research;
- and in other cases specified by law.

The Data Controller shall examine the protest as soon as possible, but not later than within 15 days from the submission of the request, make a decision on the merits of the request and inform the applicant in writing of its decision. If the User does not agree with the decision of the Data Controller, or if the Data Controller fails to comply with the above deadline, the User may apply to a court within 30 days from the notification of the decision or the last day of the deadline.

### 3 OTHER INFORMATION COLLECTED IN CONNECTION WITH THE USE OF THE WEBSITE

#### 3.1 What information do we collect in connection with your use of the Website?

If the User does not explicitly provide personal data or information on the Website as described in Part I, the Data Controller will not collect or process any personal data about the User in a way that would allow the User to be personally identified.

Such data is the data of the User's login computer, which is generated during the use of the Website and which is recorded by the Data Management System as an automatic result of the technical processes. The data that is automatically recorded is automatically logged by the system - without a separate statement or action of the User - when visiting or exiting the Website.

This data is not linked to other personal user data, i.e. the User cannot be identified based on this data. Only the Data Controller has access to such data. This data can be collected using various technologies such as cookies, web beacons and log files.

Such data shall include the following information:

- **Cookies:** Cookies are short text files that a website sends to a user's computer hard drive that contain information about the user.
- **Log files:** The Internet browser automatically transmits certain other data to the website, such as the IP address of the User's computer (e.g. 110.256.55.01), the type of operating system or browser used by the User, the domain name from which the user accesses the website subpages visited as well as sub-pages visited by the user within the website, content viewed on the website.

The Data Controller, like other ISPs, analyzes this data to determine which areas of the Website are more popular than others. Furthermore, like other major service providers, this data is also used by the Data Controller to tailor the website experience to the needs of the user.

### 3.2 How do we use this information?

The data collected with the above-mentioned technologies may not be used to identify the User, and the Data Controller does not link this data with any other data that may be identifiable.

The primary purpose of the use of such data is to enable the Data Controller to operate the Website properly, which requires in particular the monitoring of data on visits to the Website and the prevention of possible abuses related to the use of the Website. The data specified in this Policy may also be used by the Data Controller for the purpose of commenting on the User's personal preferences (e.g., the most frequently viewed content on the Website).

In addition to the above, the Data Controller may use this information to analyze usage trends or to improve and improve the functions of the Website, as well as to obtain comprehensive traffic data on the full use of the Website.

The Data Controller may use the information obtained in this way to compile or analyze statistics related to the use of the Website and to transmit to third parties' statistical data (e.g., number of visitors, most viewed topics or content) that are not suitable for such identification, or aggregate, disclose anonymously.

### 3.3 Possibility to disable cookies:

If you do not want the Data Controller to collect the information described above about you in connection with your use of the Website, you may disable the use of cookies in part or in full in your Internet browser settings or otherwise change the settings for cookie messages.

In such a case, however, you accept that certain services of the Website will not be available or not in the manner that would otherwise be enabled by enabling cookies, and the Website User cannot provide the user experience to the same extent.

### 3.4 Cookies placed by third parties:

The Website may contain information, in particular advertisements, from third parties or advertising service providers who are not affiliated with the Data Controller. These third parties may also place cookies, web beacons on the user's computer, or collect data using similar technologies in order to send the user an advertising message addressed in connection with their own services. In such cases, the data processing shall be governed by the data protection regulations laid down by these third parties and the Data Controller shall not be liable for such data processing.

## 4 LINKS ON THE WEBSITE

The Data Controller is not responsible for the content, data and information protection practices of external websites available via the Website. If the Data Controller becomes aware that the site or linking to it infringes the rights of third parties or applicable law, it will immediately remove the link from the Website.

## 5 DATA SECURITY

The Data Controller undertakes to ensure the security of the data, to take the technical and organizational measures and to establish the procedural rules that ensure that the recorded, stored and processed data are protected, and to prevent their destruction and unauthorized use. and

unauthorized alteration. It also undertakes to call on all third parties to whom the data is transmitted or passed on with the consent of the Users to comply with the data security requirement.

The data controller shall ensure that the processed data cannot be accessed, disclosed, transmitted, modified or deleted by unauthorized persons. The processed data may only be disclosed to the Data Controller and its employees, and the Data Controller shall not transfer them to a third party who is not entitled to disclose the data.

The data controller will do everything in its power to ensure that the data is not accidentally damaged or destroyed. The above commitment is imposed by the Data Controller on the employees participating in the data management activities.

The User acknowledges and agrees that the provision of personal data on the Website - despite the fact that the Data Controller has state-of-the-art security measures to prevent unauthorized access to or retrieval of data - cannot fully guarantee the protection of the data on the Internet. In the event of unauthorized access or discovery of data despite our efforts, the Data Controller shall not be liable for such acquisition or unauthorized access to data or for any damage caused to the User due to these reasons.

## 6 ENFORCEMENT OPTIONS

The Data Controller makes every effort to ensure that personal data is handled in accordance with the law, if you feel that we have not complied with this, please write to us at support@hotelhood.com or at H-1039 Budapest, Pünkösdfürdő utca 52-54. postal address.

If you feel that your right to the protection of personal data has been violated, you can seek redress from the competent authorities in accordance with the applicable law.

- at the National Data Protection and Freedom of Information Authority (address: H-1125 Budapest, Szilágyi Erzsébet fasor 22 / C.);
- or in court.

In connection with advertisements sent by electronic means, the National Media and Communications Authority acts, the detailed regulation is regulated by Act CXII of 2011 on the right to information self-determination and freedom of information. CVIII of 2001 on certain issues of electronic commerce services and information society services. can be read in law.

## 7 OTHER PROVISIONS

Hungarian Law, in particular Act CXII of 2011 on the right to information self-determination and freedom of information, applies to this Policy. The provisions of this Act shall apply.

The Data Controller reserves the right to unilaterally amend this Policy at any time with prior notice to the data subjects.

Budapest, 08.12.2020

**Online Marketing Strategy Ltd.**

Data Controller