



# SENTIO

## DATA PROCESSING POLICY OF SENTIO KFT.

### 1. General Provisions

**Sentio Kft.** (registered seat: 1095 Budapest, Soroksári út 115.; company registry number: 01-09-183542, registered by Company Registry Court of Budapest Capital Regional Court, hereinafter: Company) is continuously ensuring in respect of all personal data processed by the Company the legality and expediency of the data processing.

The purpose of present prospectus is to provide appropriate information for the accommodation reserving and personal data providing customers about the conditions, guarantees and duration of the data processing by the Company even before the reservation and the provision of the their personal data.

The data processing linked to the activity of the Company is based on voluntary consent and the performance of legal obligations, and in some other cases the data processing is necessary in order to take steps prior to entering into a contract at the request of the person concerned;

The data processing of the Company complies with the relevant acts of law, particularly the following ones:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, henceforth: GDPR)
- Act CXII of 2011 on the right of informational self-determination and on freedom of information

#### Data and contact of the Company:

- Name: Sentio Kft.
- Seat: 1095 Budapest, Soroksári út 115.
- Phone: +36-30-600-8187
- E-mail: info@sentio.hu

The company does not perform data transfer to third countries.

Miscellaneous information regarding data processing:

The Company takes every necessary technical and organizational measures for the prevention of an occasional data protection incident (e.g. damage, disappearance, and disclosure for unauthorized person of files containing personal data). In case of an emerged incident a register is being kept for the purpose of the supervision of the necessary measures and the information of the person concerned, which contains the scope of personal data concerned, the persons and their number affected by the data protection incident, the point of time, circumstances, effects and measures taken for the mitigation of the data protection incident and other data detailed in the provisions of law prescribing data processing.

### 2. Reservation



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The Company provides the opportunity for the customers to make their reservations by electronic means.

- Processor of personal data: the Company
- Purpose of data processing: the facilitation of accommodation reservation
- Legal basis of data processing: conclusion and performance of agreement pursuant to GDPR Article 6 (1) b).
- Scope of personal data processed: family and given name, phone number, e-mail address, number of customers.
- Duration of data processing: during the existence of the legal relationship established by accommodation reservation and after the termination thereof until any claim can be made in connection with this legal relationship, however, no later than 5 years after the termination thereof.
- Utilization of data processor: The Company does not have resort to an external service provider regarding reservations.

Possible consequences of the failure to provide data: contract is not formed regarding the hotel room.

Rights of the person concerned:

- may request the access to the personal data concerning him/her,
- may request the amendment of those,
- may request the deletion of those,
- may request the restriction of processing of personal data subject to the circumstances pursuant to GDPR Article 18 (namely the Company shall not delete or destruct the data until the request of courts or authorities, but at the longest for 30 days and furthermore the data shall not be processed with any other aim).
- if it is necessary, that the data processing shall happen pursuant to legal interest of the Company as well, may object against the processing of personal data.
- can practice the right for data portability. Pursuant to the latter right, the person concerned is entitled to obtain the personal data concerning him/her in the format of MS Word or Excel, and furthermore entitled, that the Company shall forward the data for another data processor on his/her demand.

### **3. Accounting documents**

In the frame of the accommodation activity carried out by the Company the following applies to the data processing:

- The processor of personal data: the Company
- Purpose of data processing: concerning any services provided by the Company for a consideration (besides accommodation also event organization, catering, etc.), the issuance of invoices, the documentation of purchases and payments, the fulfillment of accountancy obligations.
- Legal basis of data processing: the data processing is necessary for the fulfillment of contractual and legal obligations pursuant to GDPR Article 6 (1) b) and c).
- The scope of processed personal data: family name and given name, address (country), in case of organizations: name and registered seat.



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- Possible consequences of the failure to provide data: contract is not formed
- Duration of data processing: 8 years pursuant to Article 169 (2) of Act C of 2000 on Accounting.
- Utilization of data processor: The Company avails to the assistance of the service provider(s) regarding billing or accounting:

Name of Data Processor	Seat:	Description of data processor task
ATA Solution Kft.	H-2330 Dunaharaszti, Kassák Lajos utca 1. A. ép.	Performance of accounting services in accordance with Act C of 2000 on Accounting.

Rights of the person concerned: the concerned person

- may request the access to the personal data concerning him/her,
- may request the amendment of those,
- may request the deletion of those,
- may request the restriction of processing of personal data subject to the circumstances pursuant to GDPR Article 18 (namely the Company shall not delete or destruct the data until the request of courts or authorities, but at the longest for 30 days and furthermore the data shall not be processed with any other aim).
- if it is necessary, that the data processing shall happen pursuant to legal interest of the Company as well, may object against the processing of personal data.

#### 4. Other data types of processing

Authorities, public sector bodies and courts may request the disclosure of personal data from the Company. In case the body concerned indicated the exact purpose and the scope of data, the Company discloses only those personal data and only to that extent, which are essentially necessary for the implementation of the purpose of the request and if the performance of the request is prescribed by law.

The Company also keeps a record on the objects found in the hotel and restaurant, their owner and their founder:

- Legal basis of data processing: 5:54. § of the Civil Code of Hungary
- Scope of data processed: date of finding, person of the finder, designation of the found object, the fact whether the owner was notified, place of storage. signature of the founder and in case of transfer the signature of the recipient,
- Duration of data processing: The data are deleted and destructed after the takeover by the owner of the found object or the transfer to the notary of the settlement, in case of sale after 1 year calculated from the finding.

Possible consequences of the failure to provide data: the data processor cannot comply with the obligations prescribed by law.

#### 5. Cookies



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To make this site work properly, the Company places a small data file called cookie on the visitor's device. Most websites do this too.

A cookie is a small text file that a website saves on the computer or mobile device of the visitor when he or she visits the site. The sentio.hu website only saves the cookie called PHPSESSID. The purpose of this cookie is to preserve user session state across page requests. The cookie serves no other purpose. This is a functional cookie that is required for the use of the website. A data saved in the cookie is only accessible by the website and not any third parties.

The visitor of the website can control and/or delete cookies as he or she wishes. For details aboutcookies.org may be consulted. The visitor can delete all cookies that are already on his or her computer and can set most browsers to prevent them from being placed. If the visitor does this, however certain functionalities may not work.

## **6. Rights of the persons concerned, possibility for legal remedy.**

The person concerned may require information on the processing of his/her personal data, as well as may require the amendment of his/her personal data, furthermore – with the exception of the obligatory data processing – the deletion and withdrawal of them, may exercise his/her right to data portability and to objection as indicated at the data recording or on the contacts of the data processor as indicated above.

For the request of the person concerned the information is forwarded without undue delay by electric means, but at the latest within one month. The Company performs these requests of the persons concerned free of charge.

Rights of information:

The Company implements appropriate measures in order to provide for the persons concerned all information regarding the processing of personal data pursuant to GDPR Article 13 and 14 and all instructions pursuant to GDPR Article 15-22 and 34 in a compact, transparent, comprehensible and easily accessible form, formulated in a clear and easy to understand way, precisely at the same.

Right of access of the person concerned:

The person concerned is entitled to access its personal data (receive a copy) and to receive feedback from the Company whether the process of his/her personal data is in progress. If the process of his/her personal data is in progress, the person concerned is entitled to gain access to the personal data and in the following enumeration to be found information:

- purpose of data processing,
- categories of the personal data concerned.
- addressees and the categories of addressees, for whom the personal data were disclosed or going to be disclosed, including particularly those third country (non-European Union) addressees, and international organizations,
- planned duration of the storage of personal data,
- right of amendment, deletion or restriction of data processing and the right of objection,



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- right of submitting a complaint for the competent supervisory authority,
- information regarding the data source; the fact of automated decision making, including profiling as well, and on the applied logics and comprehensible information on what kind of significance this data processing has and what kind of consequences does it have on the person concerned.

## Right of rectification:

Pursuant to the rule of law anyone shall claim the amendment of inaccurate personal data concerning him/her and supplement of the incomplete data.

## Right to erasure:

The person concerned in case of the reasons below is entitled to make the personal data concerning him or her deleted on his demand without undue delay:

- the personal data are not necessary anymore for the purpose on which they were collected or handled in another way,
- the person concerned withdraws the consent for data processing and the data processing does not have any other legal basis,
- the person concerned objects against the data processing and there is not any priority lawful reason ,
- unlawful processing of personal data can be determined;
- personal data shall be deleted for the fulfilment of obligations prescribed by to the data processor applicable the law of the European Union or member states,
- personal data is collected regarding services being offered in relation with information society,

The deletion of data cannot be initiated, if the data processing is necessary for the following purposes:

- for the purpose of exercising freedom of expression and information,
- for the implementation of the task carried out in the framework of the fulfilment of obligation pursuant to the law of the European Union or a member state prescribing the processing of personal data to be applied for the data processor or for the exercise of public authority vested on the data processor.
- for the purpose of public health, archiving, scientific and historical research or statistics based on public interest,
- or for submission, enforcement or protection of legal claims

## Right of restriction of data processing:

On the request of the person concerned, data processing can be restricted pursuant to the conditions set out in GDPR Article 18.

- the person concerned disputes the accuracy of personal data, the restriction applies to the period of time, which enables the supervision of the accuracy of personal data.
- the data processing is unlawful and the person concerned opposes the deletion of data and instead claims the restriction of application of those,
- the data processor does not need the personal data for the sake of data processing, but the person concerned requires those for the submission, enforcement or protection for legal claims,
- the person concerned objected against the data processing; the restriction applies to that period of time, while it is determined whether the lawful reasons of the data processor has priority above the reasons of the person concerned.



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If data processing falls under restriction, personal data with the exception of storage shall be processed only with the consent of the person concerned, or for the submission, enforcement or protection for legal claims, or in favour of the protection of rights of natural and legal persons, or for the important public interest of the European Union or other member states. The person concerned shall be informed preliminary about the release of the restriction of data processing.

#### Right of data portability:

The data subject is entitled to receive the personal data concerning him/her, which was provided for the data processor in a well-articulated, commonly used and by computer readable format and to forward these data for another data processor. The Company shall fulfill these demands of the person concerned in the format of MS Word or Excel. The condition of the right of data portability is that the processing is automated and the legal ground is either consent or contract.

#### Right of objection:

If the processing of personal data is carried out in the interest of direct marketing, the person concerned is entitled to object against the processing of the personal data concerning him or her for this purpose at any time, including profiling as well, if it relates to direct marketing. In case of objection against the processing of personal data for the sake of direct marketing, these data shall not be processed. The right of objection applies to the person concerned, if the data processing is carried out pursuant to the lawful interest of the data processor, however in this case the subject of evaluation is the fulfillment of the request depending on which party's rights have priority pursuant to GDPR Article 21 (1).

#### Right of withdrawal:

The person concerned is entitled to withdraw the consent at any time. The withdrawal of consent does not affect the lawfulness of data processing which based on consent prior to the withdrawal.

#### Procedural rules:

The data processor informs the person concerned without undue delay but nonetheless within one month from the arrival of the claim about the implemented measures based on the claim. If it is necessary, taking into consideration the complexity of the claim and the number of claims, the deadline can be prolonged with additional 2 months. The data processor informs the person concerned within one month calculated from the receipt of the claim about the prolongation of the deadline with indicating the reason of delay.

If the person concerned submitted the claim by electronic mean, the information shall be granted also by electronic mean unless the person concerned wishes it otherwise.

If the data processor does not take measures following the request of the person concerned, without undue delay but at the latest within one month from the receipt of the request, the data processor informs the person concerned about the reasons of the failure of measure, as well as the person concerned is entitled to submit a complaint for the supervisory authority and may exercise the right of judicial remedy.

The data processor informs all those addressees on all the accomplished correction, deletion or restriction of processing, with whom the personal data were communicated, unless it is impossible or requires



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disproportionate exertion. On the request of the person concerned the data processor provides information on these addressees.

If the Company infringes the rights on informational self-determination of the data subject, he or she is entitled to file a complaint at the Hungarian National Authority for Data Protection and Freedom of Information or start a civil suit before the competent court.

Hungarian National Authority for Data Protection and Freedom of Information

postal address: 1530 Budapest, Pf.: 5.

address: 1125 Budapest, Szilágyi Erzsébet alley 22/c

Phone: +36 (1) 391-1400

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

Honlap: <http://naih.hu>