

INFORMATION ON DATA CONTROL

Camera surveillance

CONTACT DETAILS OF DATA CONTROLLER

IHG Hotel Budapest Service Limited Liability Company (hereinafter: Hotel or Data controller)
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dataprotection.budapest@ihg.com)

PURPOSE OF DATA CONTROLLING

On Data controller's premises a closed, so-called CCTV camera/video surveillance system is in operation. The CCTV camera/video surveillance system has been installed in compliance with the prevailing legal regulations, its operation and application are done in accordance with the relevant legal regulations. The electronic surveillance system (camera system) serves the purpose of property protection and to prevent illegal dealings and actions, all in compliance with § 30 (2) and §31 (1) of Act CXXXIII. of 2005 (hereinafter: Szvtv.) The purpose of data controlling is to protect the life and health of persons being on the hotel premises, and to maintain the safety and security of persons and property with the help of the electronic surveillance system.

THE LEGAL GROUNDS OF DATA CONTROLLING

It is your explicit, freely given consent as per Article 6 (1) a) of GDPR. On being aware of the present information sheet, data subjects entering the Hotel will be considered as a consent granted by implied conduct.

The electronic surveillance system operates on seven days a week, 24 hours a day, and besides showing live images, also records images. Data subjects impacted by the electronic surveillance system are persons entering the Hotel premises, including Hotel employees and Hotel guests.

THE SCOPE OF PERSONAL DATA CONTROLLED

Images, photos and conduct of persons entering the Hotel premises.

DURATION OF DATA CONTROLLING

Records of cameras are maintained for 30 days of the date of their being recorded.

APPLYING DATA PROCESSOR

Data controller does not apply data processor for executing tasks regarding the data.

ADDRESSEES

Data controller will not hand over any data to any third parties without data subject's consent. Exception will be in cases of approach from authorities and legal offices, like Police, Attorney office, Court, National security offices, Disaster recovery, National Tax and Customs authority, in which cases at the request of the aforementioned authorities data will be handed over thereto with appropriate documentation.

PERSONS HAVING RIGHT TO ACCESS DATA

Only persons having lawful rights will have access to the data, as follows. Live images of the cameras will be viewed by the receptionists, Front Office manager, the hotel manager and the guard employed by Preventive Security being on duty.

Persons having right to view the images:

- Hotel manager
- Middle managers together with the hotel manager
- Security Guards employed by Preventiv Security (they may only view the live images)

Data transfer is only allowed within the scope of prosecution regarding illegal conduct or breach of duty towards authorities conducting the investigation. Images recorded by the cameras holding relevant to the case in question will come under the scope of data transfer.

LOCATION OF THE CAMERAS

Cameras survey the full premises of the Hotel. The location of cameras (their scope), and the areas surveyed are as follows.

- There are cameras surveying area of the Hotel's parking lot and external entrances in order to ensure the security of cars and property left in the parking lot.
- The external and internal entrances and the areas open for guests of the Hotel are surveyed by cameras that serve the purpose of protecting the Hotel guests and their properties.

The purpose of the survey is primarily the protection of Hotel properties, facilities and stocks, as well as the safekeeping of properties brought in the Hotel by guests, and as such it is highly reasonable to survey the entrances, reception and common areas of the Hotel. Survey is as well done for the purpose of preventing accidents in the common areas, or investigating the circumstances of any that may occur.

At the entrance points of areas surveyed by cameras pictograms and information on data controlling notifies persons of any relevant information and circumstances.

Cameras have their scope of view as follows:	
Parking lot	30 cameras recording images 24/7
Lobby	30 cameras recording images 24/7
Corridor, lift front	10 cameras recording images 24/7
Lobby of restaurant on Apáczai street	10 cameras recording images 24/7
Guest corridors, guest storeys	5 cameras recording images 24/7
Function and banquet storey, meeting storey	30 cameras recording images 24/7

THE RIGHTS OF DATA SUBJECTS AND THE POSSIBILITIES OF EXERCISING RIGHTS

Following 25th May 2018 your data protection rights and the possibilities of exercising rights are governed by GDPR. Below you will find the key rulings of GDPR regarding your data protection rights and the possibilities of exercising these rights.

Should you have any queries or questions regarding the present Data protection information or the content thereof, our colleagues will be happy to be at your service at the contact details above.

ACCESS OR RIGHT TO BE INFORMED AS PER GDPR

Based upon this right you are entitled to be informed and to receive information from us whether your personal data is or is not in the process of being controlled by Data controller. Should such data be in the process of being controlled, you are entitled to receive access to your personal data being in such a way controlled and of information in regards therewith as follows:

- purpose of data controlling;
- the category of personal data in question,
- addressees or the categories of addressees to whom Data controller forwarded such data, including specifically addressees in third countries and international organisations,

- the duration of maintaining personal data, or if this is not feasible, the factors of defining such duration,
- Furthermore, you are entitled to request Data controller to amend, delete or to restrict the controlling of your personal data, as well as you can object to your personal data to be controlled,
- you are entitled to submit complaint to the supervising authority,
- In the event when data controller did not receive your data from yourself, you are entitled to receive all information accessible regarding the source of your data,
- should Data controller conduct automated decision making with the use of your personal data, you are entitled to be informed of the fact of automated decision-making being done including profiling, as well as of the logic applied and clear information thereof, as well as of the impact of such data processing on yourself and what consequence it may have on you.
- Should personal data be transferred to third country, you are entitled to receive information of the guarantees of legal compliance of such transfer.
- You can request copies of your personal data, and if it does not object to any legal regulation we will be providing it to you. In the event you submit your request electronically, we are to provide you with the requested information in an electronic format widely used, unless you request it differently.

RIGHT TO REQUEST AMENDMENT

As per the GDPR you are entitled to have at your request your faulty personal data to be amended by Data controller without undue delay. You are also entitled to request your incomplete personal data to be complemented.

RIGHT TO BE DELETED AND TO BE FORGOTTEN

Based upon this right, at your request you are entitled to have your personal data deleted – without undue delay as per GDPR – in case one or more of the reasons below apply:

- your personal data is not needed any more for the purpose it was initially taken or was controlled;
- You withdraw your consent priorly given to your personal data being controlled, and data controlling has no other legal ground;

- You object to your personal data to be controlled, and there is no other legal foundation enjoying priority for your personal data to be controlled;
- your personal data was handled illegally;
- personal data is to be deleted as per a legal liability defined in an EU or national legal regulation to be applied to Data controller; or
- personal data was collected while providing services connecting to information society.

In the event data controlling is necessary as per the below regulations of GDPR, no deletion of the data or its being forgotten is possible:

- for exercising the right of freedom of expressing opinion, and of the right to obtaining information;
- for the purpose of fulfilling a legal liability prescribed by an EU or national legal regulation applicable for Data controller;
- for the purpose of archiving for public interest, scientific or historic research or statistics, in case delete or the right to be forgotten would most probably make it impossible or would jeopardise such data control; or
- it is necessary to put forward, execute and protect legal requests.

THE RIGHT TO RESTRICT DATA CONTROLLING

As per the regulations you are entitled to have a restriction on the controlling of your data upon your request if one or more of the below circumstances prevail:

- You dispute the accuracy of the data controlled of you, in which case restriction applies to the period that is necessary for us to check the data you indicate as inaccurate or incomplete,
- data control is against the law, but you oppose to your personal data being deleted and instead you request a restriction of controlling your personal data,
- Data controller does not need the personal data any longer for data controlling purposes, but you request them for putting forward, execute or protect legal requests; or
- You have objected to your data being controlled, in which case restriction applies for the period before it is defined that Data controllers justified interest enjoy priority over your justified interest.

In case data controlling falls under restriction based upon the above your personal data may only be controlled – beyond their being stored – with your explicit consent, or for putting forward, executing or protecting legal requests, or for protecting your or any other person's

rights, or by public interest as per EU or national legal regulations. You will be informed prior by Data controller of any release from the restriction on controlling your data.

LIABILITIES TO PROVIDE INFORMATION CONNECTED TO YOUR PERSONAL DATA BEING AMENDED OR DELETED, OR TO ANY RESTRICTION ON DATA CONTROLLING

Data controller shall inform all addressees of amendment, cancellation or restriction on data controlling whom they informed of the personal data, except when such information provision is not feasible or would take disproportionately high efforts. Upon your request we shall inform you of such addresses.

RIGHTS TO DATA PORTABILITY

As per the GDPR you are entitled to receive the personal data you have provided Data controller with in a digital format widely used, and you are also entitled to forward such data to another data controller without Data controller hindering such forwarding of the data.

You can exercise your right to data portability in the following cases:

- data controlling is based upon consent or contract, and
- data controlling is done in an automated way.

While exercising the right to data portability you are entitled – if this be technically feasible– to request your personal data to be forwarded from Data controller directly to the other data controller you indicate.

THE RIGHT TO OBJECT

As per the GDPR you are entitled, for reasons connected to your own situation, to object to your personal data to be controlled upon grounds of justified interests, including profiling as well. In such a case Data controller will no longer control your data, except when it is proven that data controlling is made compulsory by such lawful reasons that enjoy priority over your interests, rights or freedom, or by ones that are closely connected to putting forward, execute or protect legal requests.

If the controlling of personal data is done with business purposes you are entitled to any time object to your personal data to be controlled for such purpose, including profiling that is directly connected to the business purposes.

If you object to your personal data to be controlled for business purposes, then your personal data may no longer be controlled for this purpose.

With regards to using services connected to the information society and diverting from 2002/58/EU directive you may exercise your right to object via automated devices based upon technical descriptions.

In the event of personal data being handled with the purpose of scientific and historic research or for statistics, you are entitled to object to your personal data to be handled for reasons connected to your own situation, unless data is necessary to be controlled for executing tasks for public interest.

THE RIGHT TO SUBMIT A COMPLAINT TO THE SUPERVISORY AUTHORITY

You are entitled to make a complaint to the supervisory authority – specifically in the member state of your residence, work place or the place of supposed legal breach –, if in your view the way your personal data being handled constitutes a breach to the regulations of GDPR.

In Hungary the relevant supervisory authority: National Authority for Data Protection and Information Freedom (<http://naih.hu/>; 1530 Budapest, Pf.: 5.; telephone: +36-1-391-1400; fax: +36-1-391-1410; e-mail: ugyfelszolgalat@naih.hu).

You are entitled for effective judicial remedy against the legally binding ruling of the Authority.