

PRIVACY STATEMENT

Please read this Statement carefully so that You may understand how we process Your personal data and You may familiarize Yourself with Your rights concerning data procession.

Our company as data controller is passionate about respecting all persons' privacy whose personal data we process, therefore, we, fully compliant with all effective law - particularly, with Act CXII. of 2011 on the right to informational self-determination and on the freedom of information (**Infotv.**) and Regulation (Eu) 2016/679 of the European Parliament and of the Council (**GDPR**) -, act according to this Privacy Statement. The goal of the Statement is to offer proper information to all natural persons whose personal data we process on the procession of their personal data as well as their rights related thereto.

1. Details and contact information of our company as data controller:

Company name: BALATONTOURIST Idegforgalmi és Kereskedelmi Korlátolt Felelősségű Társaság
Shortened name: BALATONTOURIST Kft.
Registered seat (postal address): 8200 Veszprém, Levendula utca 1.
Company registry number: Cg. 19-09-518365
Registration authority: Regional Court of Veszprém, Court of Companies
Tax ID number: 10320763-2-19
Represented by: Détári-Szabó Ádám general manager
Website: www.balatontourist.hu
Telephone: +36/ 88 544 400
E-mail: info@balatontourist.hu (in the following: **Company**)

2. Main legislation on data procession:

The Company's activities concerning procession of personal data are mainly governed by the following laws:

- 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 Directive 95/46/EC (General Data Protection Regulation/**GDPR**);
- Act CXII. of 2011 on the right to informational self-determination and on the freedom of information (**Infotv.**);
- Act CVIII. of 2001 on certain issues of electronic commerce services and information society services (in the following: **Ekertv.**);
- Government Decree 239/2009 (20 October) on the particulars of accommodation services and on regulations regarding issue of accommodation operation permits;
- Act LXXVI. of 2009 on the general rules of starting and offering services (in the following: **Szolgtv.**);
- Act XLVIII. of 2008 on the basic requirements and certain restrictions of commercial advertising activities (in the following: **Ads tv.**);
- Act CLV. of 1997 on consumer protection (in the following: **Fgytv.**);
- Act V. of 2013 on the Hungarian Civil Code (in the following: **Ptk.**);
- Act I. of 2012 on the Labor Code (in the following: **Mt.**);

- Act XCIII. of 1993 on labor protection (in the following: **Mvt.**);
- Act CXXII. of 2019 on persons eligible for social security, and financial coverage thereof (in the following: **Tbj.**),
- Act XXXIX. of 1998. on state supervision of the fiscal basis of social security and social security authorities (in the following: **Tpatv.**),
- Act CXCI. of 2011. on benefits for persons with challenged working abilities and amendment of certain laws;
- NM Decree 33/1998 (24 June) on medical examination and evaluation of job title, professional and personal hygiene suitability;
- EüM Decree 50/1999 (3 November) on the minimal medical and security requirements of working in front of a screen;
- Act C. of 2000 on accounting (in the following: **Sztv.**);
- Act CL. of 2017. on the tax paying process (in the following: **Art.**),
- Act C of 1990. on local taxes (in the following: **Htv.**);
- Local Council Decree 33/2014 (30 June) of the Local Council of Veszprém County Town on local taxes;
- Act CLVI. of 2016 on state obligations concerning development of tourism areas (in the following: **Tourism tv.**);
- Act XCVII. of 2018 on the amendment of Act CLVI. of 2016 on state obligations concerning development of tourism areas;
- Act LXXVI. of 2020 on establishment of the central budget of Hungary for the year 2021;
- Government Decree 235/2019 (15 October) on execution of the Act on state obligations concerning development of tourism areas;
- Act II. of 2007 on the admission and right of residence of third-country nationals (in the following: **Harmtv.**).

3. Definitions:

The definitions of given terms within this Statement are specified in Article 4 of GDPR and Article 3 of Infotv. The definitions of the main terms of this Statement are as follows:

"data subject" is any natural person identified or identifiable by any information.

„personal data” is any information pertaining to an identified or identifiable natural person („data subject”).

„identifiable natural person” is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

„special categories of personal data” are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

„processing” is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

„controller” is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes

and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

„third party processing“ is the sum of all data processing activities done by the processor, acting on behalf of, or commissioned by, the controller.

„processor“: is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

„recipient“ is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.

„third party“ is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

„data protection“ is the sum of principles, regulations, processes, data protection tools and methods aimed at the lawful procession of data and the protection of data subjects.

„data forwarding“ is the disclosure of data to a given third party.

„restriction of processing“ is the marking of stored personal data with the aim of limiting their processing in the future.

„erasure of data“ is the alteration of data which renders it unidentifiable and unrecoverable in a final manner.

„profiling“ is any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

„pseudonymization“ is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

„filing system“ is any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis.

„consent of the data subject“ is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

„personal data breach“ is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

4. Principles relating to processing of personal data:

Our Company shall act during its data processing activity as fully compliant to these principles, under which all personal data shall be

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject (**„lawfulness, fairness and transparency“**);
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes (**„purpose limitation“**);
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (**„data minimization“**);

- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay („**accuracy**”);
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organizational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject („**storage limitation**”);
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures („**integrity and confidentiality**”);
- g) considered before procession of data in cases where the legal basis of processing is the legitimate interest of the Company (i.e. when processing is based under Article 6 Subsection 1 Point f) whether the legitimate grounds of the Company override those of the data subject.

5. The range of data processed by the Company:

a) The following data of **the persons reserving accommodation and sending accommodation reservation requests (in the following: **clients**):**

- first names and surnames;
- address, any altering invoicing address, in cases of invoicing to companies, the legal person's tax ID number;
- email address;
- telephone contact details, fax number, if any;
- details of the reservation (place of accommodation, type of accommodation, price, time of arrival and departure, number of adults, number of children, number of pets, type of reservation: reservation or reservation request, number of reservation);
- payment method, other data concerning payment;
- other personal data relayed by the client, if any;
- in case of group reservation, aside from the above data, number of students and/or babies.

b) The following data of the persons accessing the Company's accommodation services (in the following: **guests):**

- first names and surnames;
- address, any altering invoicing address;
- in cases of invoicing to companies, the legal person's tax ID number;
- place and date of birth;
- number of personal identification document;
- date of arrival and departure;
- number of guest nights spent at the accommodation;
- room number, parcel number, accommodation type number
- in case of online pre-reservation, the reservation ID number;
- payment method, other data concerning payment;

- in case of tax exemption under Article 31 of Act C. of 1990 on local taxes, the fact of, legal title to, and any data proving such exemption in such a way that can be verified at a later time. In case of tax exemption due to employment, the employment certificate proving such employment;
- in case of arrival with a vehicle, the license plate number of such vehicle;
- e-mail address, should the guest subscribe to the Company's advertisement and/or newsletter service;
- any additional services used during the stay at the accommodation, if any, as well as the data concerning such use, which will subsequently be added to the invoice of such stay.
- in order to supply the services suited to the guests' special requests and/or needs, any other personal data supplied by the guests (i.e. any medical data of such guests which shall result in the special treatment of such guest, or other data pertaining to the guest's consumption i.e. food allergies);
- the signature of the guest or their legal representative on the registration sheet.

In case of guests qualifying as third country nationals under Article 2 of Harmtv., the following data, in addition to the data above:

- a) first names and surnames at birth;
- b) previous first names and surnames;
- c) sex;
- d) mother's first names and surnames at birth;
- e) nationality (nationalities) or indication of stateless status;
- h) identification data of travel documents;
- i) address of the accommodation;
- j) arrival to, and expected departure date from, the accommodation;
- k) number of the visa and/or the residence permit, and
- l) the date and place of entry into Hungary.

The Company as accommodation provider shall keep records of the above personal data of any and all third country nationals staying at commercial accommodations and at other accommodations operated by legal persons according to the prescribed form (guest book).

After the amendment of Harmtv., effective as of 1st January 2021, the Company as accommodation provider shall record the personal data, specified under Subchapter 6/B of the Tourism tv., of all third country nationals staying at an accommodation facility operated by them at the time of check-in to such facility by such third country national, by the method described in the Tourism tv., on the storage space operated by the hosting company specified by the Hungarian Government. Data such recorded shall be obtained by the foreign affairs authorities from the accommodation provider through the hosting company by using an IT application, and shall keep records thereof in order to monitor the legal status of the stay of all those concerned.

After the amendment of Tourism tv., effective as of 1st January 2021, the Company shall record the following personal data of the persons accessing their accommodation services, in order to protect the rights, security and property of the data subjects and others, and to ensure compliance to laws concerning the stay of third country nationals and persons entitled to freedom of movement and residence, at the time of check-in through the accommodation service handling software on the storage space operated by the hosting company specified by the Hungarian Government:

- a) the first names and surnames, first names and surnames at birth, place and date of birth, sex, nationality of the persons accessing the accommodation services, and their mother's first names and surnames,
- b) the identification data of the personal ID documents and/or travel documents of the persons accessing the accommodation services, in case of third country nationals, the number of the visa or the residence permit, the date and place of entry into Hungary, and

c) the address of the accommodation, the dates of arrival to, and the expected and factual departure from the accommodation.

As per relevant law, the person accessing accommodation services must show their documents indicated under Point b) during accessing the accommodation services in order to register the above data. As a consequence to denying the above data provision, the Company shall, as per law, deny access to accommodation services, should the data subject fail to show said documents.

The Company shall, due to its legal obligation stemming from Item 1036 of Annex 1 of Government Decree 388/2017 (13 December) on the mandatory data submissions into the National Statistics Data Registry Program, send monthly data on the general figures of the commercial accommodations' operation, the guest turnouts of commercial accommodations (number of guests and guest nights) in an international breakdown, the capacity figures of commercial accommodations (number of rooms and vacancies), the income and other income-related data of commercial accommodations.

c) In terms of the Company's **natural person contracting partners**, their first names and surnames, business seats, tax ID numbers, registry numbers, email contact details, telephone numbers and – should such data be necessary to execute the contract – bank account details.

d) In terms of the natural person **representative or contact person of the Company's legal entity contracting partners**, their first names and surnames, email contact details and telephone numbers.

e) In terms of the **persons subscribing to the Company's advertisement and/or newsletter services**, their first names and surnames, and their email addresses.

f) In terms of the Company's **employees**, their:

- first names and surnames;
- first names and surnames at birth;
- place and date of birth;
- mothers' maiden names;
- places of residence;
- tax ID numbers;
- Social security numbers;
- sexes;
- nationalities;
- retired registration number (in cases of retired employees);
- telephone numbers;
- school graduations, qualifications, competences;
- day of entry and exit to and from employment;
- the fixed term or indefinite term status of their employment relationship;
- job titles and job tasks;
- working time records, data pertaining to paid leaves and other types of absence;
- salary amounts, data pertaining to salary payments and payments of other remunerations, including the employee's bank account number;
- outstanding debts deductible from the employee's salary based on a final and enforceable decision or legal regulation, or the employee's consent indicated in writing, and the entitlement thereto;
- time, method and reasoning for the employment relationship's termination;
- time spent insured, codes of the employment's nature and legal title, retired status, the fact of employment during paid maternal leave or maternal benefits, the fact of receiving preliminary living

assistance, service allowance, dancer's life benefits and/or temporary miner's benefits while employed, as well as the necessity of accounting for prorated service times;

- in cases of membership status at a private pension fund or voluntary mutual insurance benefit fund, the name, ID number of the fund and the employee's membership ID number;
- data recorded in documents made concerning accidents the employee suffered;
- in cases of challenged working ability employees, the employee's work ability changes, health status, rate of health degradation, fact of disability, as well as copies of documents certifying thereof;
- data necessary for accessing welfare services and/or commercial accommodations;
- in some cases, occupational health fitness data;
- the employee's visage, recorded by the cameras operated by the Company, as well as the data obtainable from the camera recordings (location and times).

The employer shall only process personal data related to sickness and/or trade union membership for the purpose of exercising rights and/or obligations regulated in the Hungarian Labor Code.

g) In terms of the persons applying for job openings posted by the Company, the personal data contained within the applications and/or CVs, which are normally the following:

- first name and surname;
- place of residence;
- date of birth;
- indication of the applied job position;
- salary request;
- previous employers, job positions and professional experience;
- obtained qualifications, diplomas and the related educational institutions, the data of documents certifying thereof;
- other qualifications and diplomas, licenses, the data of documents certifying thereof;
- level of language skills and the document certifying thereof;
- introduction and/or cover letter;
- other incidental information relayed by the applicant;
- photo of the applicant, and
- signature of the applicant.

h) In terms of persons entering and being in the area under surveillance by electronic surveillance system (CCTV) operated by the Company, their visages, images, conduct as well as the data discernable from the tape (locations and times).

i) In cases of consumer complaints, the claimant's personal data included in the complaint letter sent to the Company, as well as the following personal data as per Article 17/A. Subsection 5 of Fgytv.:

- a) the consumer's name and place of residence,
- b) place, date and method of raising the complaint,
- c) detailed description of the consumer's complaint, the register of the documents and other evidence provided by the consumer,
- d) the Company's statement with regards to its position on the consumer's complaint, if immediate evaluation of the complaint is possible,
- e) the person taking notes and – verbal complaints relayed through telephone or other pieces of electronic communications equipment notwithstanding – the consumer's signature,
- f) place and date of taking records,

g) in cases of verbal complaints relayed through telephone or other pieces of electronic communications equipment, the unique identification number of the complaint.

6. Purpose and legal basis of data procession:

Our Company shall process personal data described within Article 5 according to the following purposes and legal bases:

a) Our company shall process the personal data of the persons reserving accommodations and sending reservation requests (**clients**) for the purposes of identifying the data subject, confirming the reserved accommodations, sending suggestions conforming to the reservation requests, drawing up the service contract, executing the contract and keeping in contact with the data subject with regards to the activities above. We process the special data of the data subject (ie. food allergies) supplied during reservation for the purpose of offering services suited to the data subject's special requests and/or needs. In some cases, the Company will process the client's necessary personal data for the purpose of exercising the Company's rights and lawful claims against the client. According to the above, the legal basis for data procession is: taking the necessary steps requested by the data subject before contracting (sending a contract offer conforming to the data subject's will), executing the contract, the data subject's freely given consent, and in some cases, the exercising of the Company's legitimate interests (Subsection 44 of GDPR's Preamble, as well as Article 6 Subsection 1 Points a), b) and f), Article 9 Subsection 2 Point a).

b) Our company shall process the personal data of the guests for the purposes of identifying the persons accessing the services (contracting parties), entering into, executing and communication in direct relation with the service contract, as well as the execution of the legal obligations outlined under Article 7 Subsections (1) and (2) of Local Council Decree 33/2014 (30 June) of the Local Council of Veszprém County Town on local taxes, Article 73 Subsections (1) and (2) of Harmtv. and Subchapter 6/B of Tourism tv. The personal data tied to the guest access to certain supplementary services and consumption details are processed for the purpose of servicing such guest requests and needs, and the inclusion and invoicing the fees thereof on the accounting documents issued regarding the accommodation services to the guest, as well as the execution of the Company's legal obligations outlined under the relevant tax and accounting regulations. The special data of the guest (ie. food allergies) supplied freely to the Company is processed for the purpose of offering services suited to the data subject's special requests and/or needs. In some cases, the Company will process the guest's necessary personal data for the purpose of exercising the Company's rights and lawful claims, stemming from its contractual relationship, against the guest.

As per the relevant regulations of Act V of 2013 on the Hungarian Civil Code, in cases of minors and majors with reduced legal capacity in terms of statements made concerning the service, any and all data processing which are based on consent shall require the guest's legal guardian's consent to the data processing.

As per the above, the legal bases for the data processing are the execution of the contract, the execution of the Company's legal obligations, the data subject's consent, and in some cases, the exercising of the Company's legitimate interests /Article 6 Subsection 1 Points a), b), c) and f), Article 9 Subsection 2 Point a) of GDPR/.

c) In cases of natural person contracting parties, our Company will process the personal data of the natural persons whom entered into a contractual relationship with the Company for the purposes of identifying the contracting parties, entering into, maintaining, executing, ending and/or terminating a contract with them as well as keeping in contact with them in relation with the above, as well as the

execution of the Company's legal obligations outlined under the relevant tax and accounting regulations and, in some cases, exercising the Company's rights and lawful claims, stemming from their contractual relationship, against the data subject. As per the above, the legal bases of the data procession are the execution of the contract, the execution of the Company's legal obligations, and in some cases, the exercising of the Company's legitimate interests /Article 6 Subsection 1 Points b), c) and f) of GDPR/.

d) In cases of natural person representatives or contact persons of the Company's legal entity contracting partners, our Company will process the personal data of these persons for the purposes of drawing up the contract, allowing for acting out the representation duties of these partners, execution of the contract and communication directly related to the contract's execution. The legal bases of the data procession are the exercising of the partner's legitimate interests of executing the contract drawn up with the Company, allowing for acting out the representation duties of their representatives and ensuring their smooth organizational operations /Article 6 Subsection (1) Point f) of GDPR/. The balance of interest test tied to this data procession is attached to this Statement as Annex 1.

e) In cases of newsletters and advertisements sent, the purposes of processing are: relaying information on the Company's wares and services, their contractual terms and conditions, special offers for persons subscribed to this service, and execution of the Company's legal record keeping obligation under Article 6 Subsection (5) of Ads tv. Legal bases: the consent of the data subject and the execution of the Company's legal obligations /Article 6 Subsection (1) Points a) and c) of GDPR/.

f) Our Company will process the personal data of their employees for the purposes of identifying the data subjects, drawing up, maintaining, executing the labor contract with them, communicating with them in direct relation to the labor contract, as well as executing the Company's legal obligations tied to labor law, social security, tax law, accountancy law and payment regulations, and enforcing the Company's claims stemming from the employment relationship. As per the above, the legal bases of the data procession are the execution of the contract, the execution of the Company's legal obligations, and in some cases, the exercising of the Company's legitimate interests /Article 6 Subsection 1 Points b), c) and f) of GDPR/.

Employer may only process personal data pertaining to illness and trade union membership for the purpose of executing rights and/or obligations based in the Hungarian Labor Code. Moreover, employers may only request participation in professional medical suitability evaluations where such evaluations are made mandatory by any labor regulations, or which is necessary to execute rights and/or obligations set out in a labor regulation, or which is necessary to provide social and wellness benefits, and which do not breach that employee's personality rights.

g) Our Company will process the personal data of their job applicants for the purposes of filling job vacancies, evaluating the applications, drawing up a contract with any successful applicants. The legal basis for the procession is the freely given consent of the data subject /Article 6 Subsection (1) Point a) of GDPR/.

Our Company will inform any and all data subjects on their decision on evaluation of their applications without delay. Our Company will promptly delete all personal data of unsuccessful applicants. Our Company shall also delete all personal data of applicants who, after filing their applications but before evaluation thereof, change their minds and inform the Company on their decision to withdraw their applications.

h) In cases of footage taped by the electronic surveillance system (CCTV) operated by the Company, the purposes of data processing are the safe operation of the accommodations (camping sites) managed by the Company as well as upholding the local policies effective at the premises thereof, sanctioning the persons breaching these policies, protection, insurance and preservation of the property of the Company

and/or third parties (guests and visitors) located at the accommodations, uncovering any wrongdoings resulting in damages thereof, providing proof for official investigations and/or litigation. The legal bases for the data procession are: The legal bases of the data procession are the exercising of the Company's legitimate interests of safe operation of the managed accommodations, upholding the local policies in relation with the above, and acting against persons in violation of such policies, and the protection of property rights of the Company, the guests staying at the accommodations and/or third parties (visitors) /Article 6 Subsection (1) Points d) and f) of GDPR/.

Our Company will inform all data subjects on using CCTV surveillance and the important details thereof – before entering the fields of view of said CCTV devices – in the form of a written notice and warning signs.

The balance of interest test tied to data procession during CCTV surveillance is attached to this Statement as Annex 2.

i) In cases of consumer complaints, our Company will process the personal data of consumers for the purposes of evaluating, answering, and – given that it is well founded, or with regards to the case's circumstances – remedying the complaint, and ensuring compliance to consumer rights legislation. We will process the personal data given by the consumer in their complaint based on their consent and to execute the Company's legal obligations under Articles 35. and 36. of Szolgtv., and the personal data described under Article 17/A. Subsection (5) of Fgytv. to execute the Company's legal obligations described therein. The legal bases of the data procession are the freely given consent of the data subject and execution of the Company's legal obligations /Article 6 Subsection (1) Points a) and c) of GDPR/.

The Company's statement concerning its online social media platforms:

The Company maintains a Facebook and an Instagram page in order to given information on, and to popularize its services, and may also appear on other web-based social media platforms.

The purpose of the Company's presence on social media sites is to share, publish and marketing the Company's services and content on its website. The social networking site allows its users to find out about the Company's services, latest promotions, events organized by the Company and other events, as well as news about the Company.

Under the terms of the social network, the user of the social network may, at their own will, follow, like and share content posted or shared by the Company on their own timeline, all of which are based on the voluntary consent of the data subject. The data subject can sign up to follow the Data Controller's Facebook page by clicking on the "like" or "dislike" button, or use the timeline settings to delete or restrict unwanted news or content that appears on the timeline.

In all cases, contacting the Company on its social networking sites is voluntary and is based on the decision of the data subject' s own will. The data processing covers the public name, public photo and content of the message addressed to the Company by the person contacting the Company on the social networking site. The purpose of data processing is to answer the data subject's message or questions. Legal basis for data processing is the voluntary consent of the data subject /Article 6 Subsection (1) Point a) of GDPR/.

Users may, if possible on the social networking site, rate the Company's services in text and in numerical form at their own choice, and may mark the Company's social media pages in their own social media posts, which are user reviews, logins and posts on the Company's public social media pages. Legal basis

for data processing is the voluntary consent of the data subject /Article 6 Subsection (1) Point a) of GDPR/.

In the case of photos and videos published on the Company's social media pages, provided that the recording wasn't made of a crowd or of an appearance in public life (Article 2:48 of Ptk.), publication will be made on the basis of the voluntary consent of the data subject in order to promote the Company's services. Legal basis for data processing is the voluntary consent of the data subject /Article 6 Subsection (1) Point a) of GDPR/.

The Company will involve the following person as a data processor:

Facebook Ireland Ltd.

Company registry number: 462932

Tax ID number: IE 9692928F

Business seat: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

Business site: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

Postal address: 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

Telephone: +001 650 543 4800, as the provider of Facebook and Instagram applications and the Messenger messaging service.

The data involved in the processing are primarily the name and e-mail address and password of the data subject and, secondly, additional data sent by the data subject in his chat message.

Purpose of data processing: to provide the space and software necessary for the operation of the Facebook and Instagram applications, as well as the Messenger messaging service.

The processing of data is carried out electronically, and will mean the provision of electronic storage and messaging software.

Visitors to the Company's social media sites are otherwise subject to the privacy- and general terms of service of that social network.

7. The planned period of data processing:

The retention period for data relating to the performance of contracts shall be 5 (five) years after the termination of the contract, taking into account the general limitation period for civil claims.

In the event of non-execution of the contract, the data retention period shall be 5 (five) years from the date of settlement between the parties and, in lieu of a settlement obligation, the data shall be deleted immediately after the failure to execute the contract.

The retention period for invoices and documents on which invoices are issued shall be 8 (eight) years, as per Article 169 Subsection (2) of Sztv.

Retention period of the documents on which the employment relationship is based: 8 (eight) years from the date of termination of the employment relationship. Conversely, employment documents relating to the insurance relationship of persons presently or previously insured, and/or those containing data pertaining to insurance times and/or salaries/income to be evaluated during pension calculations will be retained for a period of a further five years from the time the insured or previously insured person reached their retirement age. (Article 99/A. Subsection (1) of Tny.).

The Company shall immediately inform the data subject of the outcome of the evaluation of the job applications announced by the Company. After the evaluation of the applications, the processing of the personal data of the selected applicant shall be governed by the provisions of this Privacy Statement

published on the Company's website concerning the processing of employees' personal data and the provisions of the Company's separate Statement made for its employees. The Personal Data of unsuccessful applicants will be deleted by the Company immediately after the evaluation of the applications. Our Company shall also delete all personal data of applicants who, after filing their applications but before evaluation thereof, change their minds and inform the Company on their decision to withdraw their applications or their consent to the data procession tied thereto, in which latter case the Company shall deem the data subject's application – in lieu of data necessary for evaluation – to be revoked.

The Company will process the personal data of the persons who subscribe to their advertising and newsletter services until the data subject's consent is withdrawn. The data subject may withdraw their consent to the processing at any time, without giving reasons or without any adverse consequences, by means of a written statement addressed to the Company's postal or electronic contact details, in which case the personal data of the data subject processed for the foregoing purpose will be deleted without delay.

In the absence of any circumstance giving rise to the preservation or transmission of the recordings, the Company shall delete the footage taken by the electronic surveillance system (CCTV) in their operation after 72 hours after their recording.

The Company is obliged to keep copies of the records made on the consumer complaints as well as the replies thereto for five years as per Article 17/A. Subsection (7) of Fgytv., and shall present them to inspecting authorities upon request. If judicial or other administrative proceedings have been pending in respect of the consumer protection dispute, the Company shall delete the data relating to the dispute 5 (five) years after the final conclusion of the proceedings or, if a final decision is taken in the proceedings, after the expiry of the right to enforce the decision.

If, in case of any data processing, its duration is laid down by law for the Company, the duration of the data processing is the period specified in the applicable legislation.

8. Persons entitled to access to personal data:

The company's management (senior executives) and employees are entitled to access the personal data processed by the Company, in compliance with the company's data management policy and applicable law. In order to ensure the security of personal data, our employees involved in the processing of personal data are bound by a duty of confidentiality.

8.1. Data forwarding, data processors and joint data controllers involved during the Company's data processing:

In the course of its data processing activities, our company regularly forwards personal data to the following persons (recipients) by law or for the performance of its contractual obligations:

a) Data forwarding to online payment services: In order to carry out online credit card payment transactions and Széchenyi Rest card payments, to prevent and detect abuses, fraud, and to carry out any additional tasks that may be necessary for the payment service provider in order to ensure the effectiveness of the payment, and to confirm the transactions, the Company will use the following payment service providers:

- **OTP Bank Nyrt.**

Company registry number: 01-10-041585
Business seat: 1051 Budapest, Nádor u.16.

- **MKB Bank Nyrt.**

Company registry number: 01-10-040952
Business seat: 1056 Budapest, Váci u. 38.

- **K&H Bank Zrt.**

Company registry number: 01-10-041043
Business seat: 1095 Budapest, Lechner Ödön fasor 9.

Payment will be made using the POS terminal located at the property when paying by credit card. In doing so, the guest gives the payment details of their credit card directly to the financial institution or payment service provider of the POS terminal, on which data the Company will not be informed. The data controller of payment data will be the provider of the POS terminal, as a stand-alone data controller.

The operator of the POS terminal located in the accommodations managed by the Company:

OTP Bank Nyrt.

Company registry number: 01 10 041585
Business seat: 1051 Budapest, Nádor u.16.

A copy of the document printed by the POS terminal on the card payment is retained by the Company, however, said document will only feature the last four digits of the credit card number used for the payment, which in itself is unsuitable for the identification of the credit card or the credit card holder.

b) Data forwarding towards storage services:

- As per Tourism tv. and its executing decree, the Company shall involve the following electronic storage service provider specified in Tourism tv. as data processor:

Hungarian Tourism Agency Limited

Company registry number: 01-10-041364
Business seat: 1027 Budapest, Kacsá utca 15-23.
Postal address: 1525 Budapest Pf.: 97.
Telephone: +36 1 488 8700
E-mail address: info@mtu.gov.hu
Website: <https://mtu.gov.hu>

The activity of the storage service provider, as the Company's data processor, covers only the storage of the data on the storage site in an encrypted form by the provider of the encryption procedure designated by the Government's decree and the provision of access to the data by the Company and the person or body authorized by law through the Company. The storage service provider may not access data stored at the storage site.

The police may, for the purposes of law enforcement, crime prevention, the protection of public order, public security, the order of the state border, the rights, security and property of the data subject and others, and the conduct of warrants procedures

a) search the data stored with the storage service provider by means of an IT tool and, as a result of the search, may be able to find out which accommodation provider is used according to the search criteria specified, and

b) – by indicating the purpose of the data request - request the transmission of data processed by the accommodations service provider, which shall be provided free of charge by the accommodations service provider.

- The Company will store the data of its website www.balatontourist.hu at the server of the following storage service provider commissioned for this purpose:

Seeman Productions Kft

Company registry number: Cg. 01-09-935755

Business seat: 1146 Budapest, Ajtósi Dürer sor 19-21.

c) Data forwarding to software service providers: The Company has an assignment relationship with the following software service providers as data processors in order to use the following services:

- the software used for salary calculations from SZÁMORGDATA Kft. (Company registry number: Cg.01-09-074741, Business seat: 1146 Budapest, Zichy Géza utca 4.);
- the software used for invoicing and guest records from CampSoft Kft. (Company registry number: Cg.19-09-514746, Business seat: 8200 Veszprém, Vilonyai utca 10. B. lház. 4. em. 12.);
- the software used to manage online reservations made through the Company's website at www.balatontourist.hu from Seeman Productions Kft. (Company registry number: Cg.01-09-935755, Business seat: 1146 Budapest, Ajtósi Dürer sor 19-21.);
- the SAP Business One integrated company management system from Enterprise Soft Kft. (Company registry number: Cg. 01-09-958817, Business seat: 1023 Budapest, Harcsa u. 2);
- the software used for data transmission to the Hungarian National Tax and Customs Administration from DSI Rendszerház Kft. (Company registry number: Cg.01-09-935783, Business seat: 1126 Budapest, Vöröskő utca 8. II. em. 5.);
- the „Bonomi Asszisztens” marketing software from MÖBIUS Mobile Marketing Kft. (Company registry number: Cg. 01-09-980522, Business seat: 1094 Budapest, Angyal utca 17. 2. em. 2.).

d) Data forwarding to the service provider responsible for the development and operation of the Company's website: The Company shall involve Seeman Productions Kft. (Company registry number: Cg.01-09-935755, Business seat: 1146 Budapest, Ajtósi Dürer sor 19-21.) as an external service provider data processor for the development and operation of their website at www.balatontourist.hu.

e) Data forwarding to the auditor: the Company will use the following auditor to carry out audit tasks under Sztv., the data necessary for the performance thereof will be transmitted in order to carry out its tasks.

Company name: **Quercus Audit Könyvvizsgáló és Gazdasági Tanácsadó Kft.**

Company registry number: 19-09-512226

Business seat: 8200 Veszprém, Radnóti tér 2. C. ép.

f) Data forwarding to the Company's contracting partners:

- The Company has a contractual relationship with the business entities operating online accommodation recommendation sites or travel agencies (hereinafter referred to as "**Partners or Partner**") for the intermediation of the accommodation services provided by the Company through the Partners. On the basis of the foregoing, the Partner used by the data subject will transfer to the Company the personal data provided by the data subject to the Partner, in which case the Company will implement joint data processing with that Partner.

The Company transmits to its Partner the personal data necessary for the performance of the contract concluded with that Partner, such as data relating to the booking, mediation or use of vouchers.

Scope of data subjects: guests reserving accommodations at the Company through any of its accommodation mediation Partners. Reservations can be made online, in person with the Partner or in other ways provided by the Partner. Due to the fact that data subjects can send their bookings using the Partner's website or application or through the Partner's representative, they will always be able to find out the identity of the Partner involved in the joint processing.

Scope of data subject to data processing: the scope of the data may vary in part depending on which Partner of the Company the data subject is using the services of. The widest possible scope of data are the following:

- surname,
- first name,
- Address,
- telephone number,
- fax number (if any),
- e-mail address,
- the planned day of arrival at the accommodation,
- the planned day of departure from the accommodation,
- number of room / rooms selected, guest capacity and type thereof
- the number of adults staying as guests,
- the number and age of children staying as guests,
- requested catering (breakfast, half board, full board),
- booking number,
- other services that may be requested,
- the price of the services.

Legal basis for data processing: Article 6 Subsection (1) Point b) of GDPR, according to which the processing is necessary for the performance of a contract to which the data subject is party.

Purpose of data processing: from the Company's point, drawing up and executing the contract for the provision of accommodation and providing a service to meet the requirements of the booking; from the Company's Partner's point, the successful mediation of the service, facilitating the drawing up of a service contract between the Company and the data subject.

Term of data processing: The Company will delete the data processed in connection with the booking after 5 (five) years from the date of booking or, in the event of the termination of the service agreement, the termination thereof, which is the limitation period applicable in general civil claims. Conversely, personal data on which invoices are based upon shall be retained for a period of 8 (eight) years, as per Sztv.

In the case of contracts resulting from the booking - the use of accommodation services -, the processing and retention period of personal data and the provisions of this Privacy Statement published on the Company's website shall apply to guests.

The permanent Partners of the Company are mainly the following:

Name of the Partner	Country	Post code	City	Address	E-mail	Company registry number
DAEN s.r.o.	CZ	10200	PRAHA	Daliborova 161/26	aniko.puza@daen.cz	61168807
Camping Vision AG.	CH	1212	GENEVE	Rue du Bachel 14	backoffice@campingvision.com	CH-660-2192912-7
DER Touristic GmbH.	D	60424	FRANKFURT AM MAIN	Emil-von- Behring-Str. 6	campingwelten@dertouristik.com	
Euronature BV	NL	5161	RK SPRANG_CAMP PELLE	Nieuwevaart 100	euronature.nl@gmail.com	
HEPEX Slovakia s.r.o.	SK	94501	KOMARNO	Rozmarínová 22	rezervacie@travelguide.sk	978-80-969719-9-2
Ibusz Kft.	H	1118	BUDAPEST	Dayka Gábor u.3	belfold@ibusz.hu	01-09-266780
SZALLAS.HU Zrt.	H	3525	Miskolc	Régiposta u.9.	szallas@szallas.hu	05-10-000622
Booking.com B.V.	NL	1717 CE	AMSTERDAM	Herengracht 597,	info@booking.com	31047344
ACSI Touroperating BV	NL	6670	AA ZETTEN	Postbus 34.	backoffice@suncamp.nl	10142918
Terra Tour Travel Agency s.r.o.	CZ	58601	JIHLAVA	Komenskeho 1363/34	terra@ji.cz	01 06 412282
TTS V.O.F.	NL	2261	EA LEIDSCHEN DAM	Patrijslaan 27.	boeking@hongarijespecialist.nl	
Vacansoleil B.v.b.a.	B	8200	BRUGGE	Koningin Astridlaan 29/5	allotments@vacansoleil.com	17032917

g) Data forwarding of employee personal data as contact persons: If the employee as data subject is in contact with the Company's contractual partners due to their job tasks, their necessary personal data will be forwarded to that partner. Only the employee's name, job title and the scope of their right of representation, as well as their contact details at work, may be forwarded.

i. Data forwarding to other recipients: The Company forwards the personal data of their employees and, where applicable, their relatives and users of the Company's services to the statutory authorities (tax authorities, social security and pension administrations) for the purpose of fulfilling its tax and social security obligations under the applicable legislation. Moreover, the Company shall, where appropriate, transfer the personal data of the data subject necessary for the enforcement of the claim to the persons and bodies acting on such claims in order to pursue its claims and interests arising from its contractual or non-contractual obligations with the data subject.

9. You are entitled to the following rights in relation to the processing of Your personal data:

a) Information and access to personal data

The data subject shall have the right to receive information from the Company, and, upon request, receive feedback on the fact of personal data procession, the personal data of the data subject being processed,

the purpose and legal basis of the processing, the recipients with whom the Company discloses said data, the intended duration of the processing, the use of profiling, if any, the rights of the data subject in relation to the processing and the way in which those rights are enforced, the circumstances in which data breaches have occurred in connection with the processing of said personal data, the effects and the measures taken to address thereof. The data subject is also entitled to request the Company to supply a copy of their personal data at their request. The Company may charge a reasonable fee based on administrative costs for additional copies requested by the data subject. Upon the request of the data subject, the Company shall inform them in writing on what is shown in the recording of them.

b) Right to rectification

The data subject shall have the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

c) Right to erasure („right to be forgotten”)

The data subject shall have the right to obtain from the Company the erasure of personal data concerning him or her without undue delay and the Company shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the personal data have been unlawfully processed;
- c) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- d) the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the processing of the data subject’s personal data was done for the purpose of direct marketing;
- e) the personal data have to be erased for compliance with a legal obligation in Hungarian and/or Union law, or a decree of an acting court and/or other authority;
- f) the personal data have been collected in relation to the offer of information society services.

Erasure request shall not be completed, should the processing be necessary

- for exercising the right of freedom of expression and information;
- for the establishment, exercise or defense of legal claims;
- for compliance with a legal obligation that the Company is subject to;
- for reasons of public interest in the area of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing.

d) Right to restriction of processing

The data subject shall have the right to obtain from the Company restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the Company to verify the accuracy of the personal data;

- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Company no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims; or
- d) the data subject has objected to processing pending the verification whether the legitimate grounds of the Company override those of the data subject.

h) Right to withdraw the data subject's consent given to data processing for marketing purposes

The data subject shall have the right to withdraw their prior consent to the use of their personal data for direct marketing purposes at any time, without giving reasons or without any adverse consequences, by sending a statement to the Company's registered business address or e-mail address. In this case, the Company will immediately delete the personal data of the data subject processed for this purpose from its records and will no longer send advertising or newsletters to the data subject.

i) Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the Company to which the personal data have been provided, where the processing is based on the data subject's consent or a contract drawn up with the data subject, and the processing is carried out by automated means.

Given that the Company processes the personal data recorded by their CCTV system for the purpose of exercising their legitimate interests as per above, the data subject normally does not have the right to data portability concerning these data. If the Company processes the data on a different legal basis, for purposes other than those stated above, the data subject may be entitled to exercise the right to data portability, depending on the circumstances of the specific processing, as set out in this sub-paragraph.

j) Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on the exercising of the legitimate interests of the Company or a third party. In this case, the Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

k) Right to legal remedies

The data subject may make a complaint or request regarding the company's data processing orally on the spot or in a letter addressed to the Company's registered business address and/or electronic contact details in accordance with this Statement. A written record of the oral complaint and application shall be drawn up by a staff member of the Company on the spot, signed by the complainant/applicant. The Company shall inform the complainant or applicant without undue delay, and at the latest within 1 (one) month of receipt of the complaint or request, of its decision on its case and of the measures taken or planned to be taken by the Company. If necessary, taking into account the number of applications and their complexity, this deadline may be extended by a further 1 (one) month. The Company shall inform the data subject of the extension of the deadline within 1 (one) month of receipt of the complaint or

request, indicating the reasons for the delay. If the data subject has submitted their complaint or request electronically, the company shall also provide the information electronically, unless the data subject expressly requests otherwise. If the request or complaint is unfounded, the Company shall inform the data subject without delay and at the latest within 1 (one) month of receipt of the request or complaint, the reasons for such and the remedies available to the data subject, as follows: if the data subject considers that the processing of their personal data violates the applicable legal requirements, they are entitled to lodge a complaint with the data protection supervisory authority or to initiate litigation proceedings. In Hungary, the data protection supervisory authority is the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11., postal address: 1363 Budapest, Pf. 9., telephone number: +36 1 391 1400, fax: +36 1 391 1410, e-mail address: ugyfelszolgalat@naih.hu, website: <http://www.naih.hu>.) Data protection lawsuits are judged by the competent Regional Courts as per Hungarian law. Such lawsuits – as per the choice of the data subject – may be initiated in front of the competent Regional Court of either the data subject’s permanent residence or their temporary residence.

Drawn up at: Veszprém, 2020. 12. 04.

**BALATONTOURIST Idegenforgalmi és
Kereskedelmi Korlátolt Felelősségű
Társaság**

Annex 1.

Balance of interest test tied to the data procession concerning the personal data of persons designated as representatives and/or contract persons of the Company’s legal entity contracting partners

Purpose of personal data processing, identifying the legitimate interest:

The Company will process the personal data of persons designated as representatives and/or contract persons of the Company's legal entity contracting partners for the purposes of drawing up the contract, allowing for acting out the representation duties of these partners, execution of the contract and communication directly related to the contract's execution. The legal bases of the data procession are the exercising of the partner's legitimate interests of executing the contract drawn up with the Company, allowing for acting out the representation duties of their representatives and ensuring their smooth organizational operations.

Identifying the data subjects' interests and the impact of the data procession thereupon: The interest of the data subject is the freedom of exercising their right to informational self-determination and the control and integrity over their personal data. The transfer of personal data by the partner restricts the data subject from exercising their right of self-determination, against which the data subject may object at the Company under the Regulation. The circumstances of the transfer of data by the partner and the processing of data in connection with the above in the partner's organization shall be provided by the partner to the data subject.

The scope of persons entitled access to the personal data: the data subject's data may only be known within the Company's organization to persons who, by reason of their duties, are personally involved in the preparation, drawing up and execution of the contract.

Term of data retention: The Company will only process the data of the data subject in the context of its legal relationship with the partner organization, to the extent and for the time necessary for their performance, and will also limit the scope of the data only to the necessary data. As such, the processing of the data lasts primarily until the end of the existence of a contractual relationship. In the case of contractual documents, and, in the case of communication through email, the emails containing relevant statements to the contractual relationship, the Company shall retain such documents for a period of 5 (five) years - the limitation period applicable to general civil claims - from termination of the contractual relationship with the partner. Conversely, the documents necessary for compliance to the document retention obligation outlined under Article 169 of Sztv. shall be retained for a period of 8 (eight) years from issue thereof. This obligation may also cover the retention of the documents of each contract, in which case the data of the data subject will also be retained for that period, with the above 8-year period to be calculated from the termination of the contractual relationship.

Method of data storage: the Company stores the data in contractual documents and, in the case of electronic mail contacts, in the Company's e-mail system. Phone numbers and names are stored in the memory of the mobile phones used by the Company for the duration of the business relationship, as well as in the software used for electronic mail.

The necessity for data processing, the guarantees incorporated in the process of data management to protect the rights of data subjects and proportionate limitation of rights, and the comparison of the interests of the Company and the data subjects:

The Company communicates with their business partners through their representatives and contacts. In doing so, they shall only carry out operations on the data of the persons acting as the partner's representative or contact person which are necessary for the preparation, drawing up, execution or termination of the contract with that partner.

The partner who has a contractual relationship with the Company has a legitimate interest in the performance of the contract, the communication necessary therefor, and the enabling of representation. The partner undertakes a contractual obligation to execute the contract with the Company and

consequently has a legitimate interest in its performance. As such, the purpose of data processing is to enable the cooperation and communication necessary for the performance of the contracts to be carried out and to make declarations, such conduct makes it essential to process the data of contact persons and representatives.

The data subject is the partner's employee, chief executive officer, member, shareholder or owner. In the case of an employee status, the job of the data subject is to perform the duties of contact and representation. In the case of membership, shareholder and ownership positions, the successful execution of the contract with the Company of the represented entity is also in the interest of the data subject. In the case of a position of chief executive officer, the data subject has a statutory obligation to act as the legal representation of the organization. In each case, it can be concluded that the data processing can be counted on by the data subject and is not unexpected.

Therefore, the interest pursued by the Company, which is the legitimate interest of the partner in the exercise of his business interests, the performance of his contract with the Company, the enablement of the exercise of the partner's right of representation and the ensuring of its organizational functioning, is a prerequisite for the effective functioning of the partner as well as the contractual relationship between the partner and the Company. If the Company does not process the data of the contact person or representative, a consistent and reliable flow of information between the parties would become impossible and the identification of the person entitled to make a legal declaration in relation to the contracts, the verification of the validity of the legal declarations made in connection with the contracts, thereby making effective cooperation between the parties in the context of the contract would become significantly more difficult. This would jeopardize the performance of the contracts, in this context the functioning of the contracting partner and the effective business cooperation between the partner and the Company.

As per the above, the conclusion of the contract, the exercise of the rights in the legal relationship and the necessary exchange of information cannot take place without the processing of the data of the representative and/or contact natural persons, i.e. the processing is essential for the performance of the contract. In view of the scope of the data processed and the role of the data subject, overall, the processing does not carry any substantial risk to the data subject and does not involve or have an unexpected effect on the data subject.

In view of the foregoing, the processing of the data of the natural persons concerned by the processing is necessary and proportionate, essential for the exercise of the above-mentioned interests of the Company's partner and does not imply excessive interference with the privacy of the data subject. In compliance with the guarantees set out above, the Company considers the processing of the contact person's representative's data for the above purposes to be justified, necessary and proportionate for the purpose of enforcing the legitimate interest of its partner.

Annex 2.

Balance of interest test tied to the data procession concerning CCTV surveillance

Purpose of personal data processing, identifying the legitimate interest: The purpose of CCTV surveillance is the safe operation of the accommodations (camping sites) managed by the Company as well as upholding the local policies effective at the premises thereof, sanctioning the persons breaching these policies, protection, insurance and preservation of the property of the Company and/or third parties

(guests and visitors) located at the accommodations, uncovering any wrongdoings resulting in damages thereof, providing proof for official investigations and/or litigation.

Identifying the data subjects' interests and the impact of the data procession thereupon: The interest of the data subject is the freedom of exercising their right to informational self-determination and the control and integrity over their personal data. The processing is capable of affecting the conduct of the observed person and thus necessarily restricting the rights and freedoms of the observed person and limiting their privacy, which, as explained below, is not likely to cause undue harm, disadvantage or inconvenience to the data subjects.

The scope of persons entitled access to the personal data:

The Company stores the footage on a password-protected storage unit located in a closed room on the property's premises, to which the accommodation managers (camp managers) have access (restricted access). Employees entitled to access the footage shall be bound by obligation of confidentiality with regard to the personal data they become aware of.

The footage recorded by the video cameras are normally not viewed or known to anyone, since the Company does not employ special staff to monitor and survey the footage on an ongoing basis, and the footage is not used or linked to data from other sources in the absence of a due reason, therefore the surveillance does not affect the data subjects without the circumstances giving rise to the viewing and use thereof. The footage will only be reviewed or used if the Company, the data subject or another person has a legitimate interest or a legal obligation to do so. Due to the above, data forwarding may be done due to illegal conduct or breach of obligations, and/or any ongoing process related thereto towards the acting authorities and/or courts, and, at the request of the data subject, the footage related to them. At the request of an official or a court, the Company is obliged to forward the footage requested by the authority or court. In the event of unlawful employee conduct or misconduct, the Company shall, unless the circumstances of the case preclude it, ensure that the employee concerned is present at the time of the review of the footage or during the verification.

The Company entrusts the technical maintenance and repair of the electronic surveillance system to an external service provider, who may, in order to perform the above tasks, have access to the necessary live image broadcasts and examine the functionality of the recorded footage operations, during which they may have access to the stored recordings as necessary. If the processing is carried out on behalf of the Company by others, the Company may only use data processors who provide adequate guarantees for the implementation of appropriate technical and organizational measures to ensure compliance with the requirements of GDPR and the protection of the rights of data subjects.

Term of data retention:

Footage transmitted by the CCTV surveillance system is recorded continuously. The Company stores the footage only for the necessary period of time: in the absence of a condition giving rise to use or transmission, the recordings will be deleted after 72 hours from the date of their creation. Further storage may only take place for the purpose of use or transmission as described above, in which case the footage containing the data strictly necessary for the purpose of use will be salvaged from the recording unit. In these cases, further storage shall be limited to the time necessary to achieve the objective or to the time necessary to fulfil any legal obligation.

The necessity for data processing, the guarantees incorporated in the process of data management to protect the rights of data subjects and proportionate limitation of rights, and the comparison of the interests of the Company and the data subjects:

In the accommodations (campsites) operated by the Company, there are high-value assets owned by the Company, as well as the property of the Company's guests and other visitors, in connection with which

the Company, as the operator of the accommodation (campsite), is obliged to ensure ongoing property protection.

Due to the above, the Company has legitimate interests to the protection, insurance and preservation of the property of the Company and/or third parties (guests and visitors) located at the accommodations, uncovering any wrongdoings resulting in damages thereof, providing proof for official investigations and/or litigation. As an operator, the Company has a legitimate interest in preventing or assisting in the demonstration of infringements of the property of guests and other visitors. It is also in the interest of the guests and visitors that their valuables imported into the accommodation sites are safe.

The Company's financial liability and interest in preserving its reputation are closely linked to the foregoing, since infringements concerning property may raise the obligation of the Company to be liable for damages, moreover, the company's reputation on the market may be significantly damaged as a result of the infringements, which may also cause significant material damage to the Company.

In the absence of data processing, the Company would not be able to gain credible information about any acts or events against property in the accommodation area and thus would not be able to act effectively to achieve the purposes for which it was processed. In the event of non-processing (lack of CCTV surveillance), thefts and crimes against property would not be detected at all or would be less effective, which would cause offenders to assume that they can commit crimes or unlawful acts in the property in a safer manner. As a result, an increase in the number of offences against the property of the Company and persons residing in the accommodation area would be expected.

The effect of the processing on data subjects is that it is capable of influencing the conduct of the observed person and thus necessarily limits the rights and freedoms of the person being monitored, limiting their privacy, which, as explained below, is not likely to cause undue harm, disadvantage or inconvenience to the data subjects.

In fact, CCTV surveillance only concerns common spaces where, by reason of their purpose, the data subjects are not present for a long period of time, so that the data subject can only be affected on an occasional, short period of time, the location of the cameras, the purpose of the surveillance areas and the number of cameras do not allow for the continuous monitoring of the data subjects. The cameras are positioned in such a way that, due to their fields of vision, they are capable of preventing and uncovering eventual thefts or other crimes against property and/or monitor processes and events endangering thereof, therefore the processing is suitable for the purpose of the data procession.

The cameras only record images, they are not suitable for recording audio. The footage does not show any adjacent property or public space.

In all cases, the Company informs the data subjects about the fact of CCTV surveillance and its essential circumstances, so that the data subjects are not caught unawares by the processing and have the opportunity to know all the essential elements of the data processing. As part of the notification obligation, the Company will inform all data subjects on using CCTV surveillance and the important details thereof – before entering the fields of view of said CCTV devices – in the form of a written notice and warning signs placed in an easily viewable location and method.

The Company does not make decisions based on automated data processing or perform profiling in connection with data processing. The Company will only transmit data collected through CCTV surveillance in the cases specified in this Statement.

The Company is obliged to record the fact, reason and time of the non-automatic data processing operations related to the image recordings (looking back, salvaging, transmitting, individual deletion)

and the person who carried out the data processing operation and who is familiar with the recordings. An electronic register containing the foregoing data shall also be considered as a protocol.

The purpose of camera surveillance in the observed area cannot be achieved by any other measure involving a minor limitation of the rights of the data subjects and without unjustified additional costs for the Company.

As a result of the balance of interest test carried out as described above and taking into account the guarantee measures listed above, the Company considers that the processing complies with the requirements of necessity and proportionality, that the processing proportionately limits the rights and freedoms of data subjects and that there is no disproportionate restriction or unjustified interference with the privacy of the data subjects in relation to the advantages of the processing.

Subject to the guarantees set out above, the Company considers the processing of data of data subjects to be justified, necessary and proportionate in order to exercise its interest in CCTV surveillance.