

LET ME INN KORLÁTOLT FELELŐSSÉGŰ TÁRSASÁG

PRIVACY POLICY

Effective date:

2019. January 1.

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1. PREAMBLE, OBJECTIVE OF THE RULES

- 1.1. **Let Me Inn Korlátolt Felelősségű Társaság** (Seat: 1025 Budapest, Napsugár lépcső 13.; Registration number: 01-09-271066; VAT number: 25367504-2-41.; hereinafter: „**Company**” or “**Service Provider**”) is a company dealing with complete management and administration of short-time lease of real estates. In order to promote the Company's services more widely and to facilitate contact with potential customers, the Company created *www.letmeinn.hu* homepage (hereinafter: „**Homepage**”).
- 1.2. During its activity the Company processes personal data defined in Article 4, point (1) of 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 („**GDPR**”) originated from the Companies clients, users of the Homepage, recipients of its marketing messages, as well as other affected persons. These rules and information on data protection (hereinafter: „**Rules**”) include the conditions of data processing of the Company of these personal data. The Company, as data controller, subjects itself to the contents of these Rules, furthermore undertakes liability to that all the data management connected to its activities shall be compliant to the requirements specified in these Rules and the valid Hungarian and EU legal regulations.
- 1.3. The objective of these Rules is that the processing of personal and incidental sensitive data
 - (a) necessary for the popularization in an electronic way of the services provided by the Company,
 - (b) necessary to contact the Company via the Homepage, and
 - (c) necessary for the activity of the Company,

should take place pursuant to the provisions of the prevailing Hungarian and EU legal regulations on data protection. The objective of these Rules furthermore is that the Company previous to the processing of personal data to provide clear and detailed information on all facts relating to the processing of personal data, especially the purpose and legal basis of the data processing, the persons authorized to process and manage the data, the duration of the data processing, and to determine who can access the data and which rights and remedies are available for the affected person.

- 1.4. Furthermore, the objective of these Rules is that in the whole scope of services provided by the Company, the user can be assured of that – regardless of the user’s sex, nationality or home address – the user’s rights and basic rights of freedom, such as especially their right to private life will be respected while their personal data is processed electronically (data protection). The Company shall process the recorded personal data in confidence, by complying with the legal regulations and international recommendations on data protection and these Rules on data protection.
- 1.5. During the establishment of these Rules, the Company has taken into account the provisions of GDPR, the Act CXII of year 2011 on the right to possess personal data and the freedom of information (hereinafter: „**Info Law**”), the Act V of year 2013 on civil code (hereinafter: „**Civil Code**”), and the Act XLVIII of year 2008 on the basic conditions and certain limitations of economic advertising activity (hereinafter: „**Advertising Law**”).

2. INTERPRETATION OF THE RULES, DEFINITIONS

- 2.1. These Rules shall be interpreted based on the principles of English language in consideration of the general legal principles of the Hungarian civil law. When interpreting these Rules, the words and phrases written in capital letters shall have the meaning conferred to them on their first place of appearance in the Rules – independently of their tense, mode and case, or whether they are singular or plural.
- 2.2. In harmony with the provisions of Info Law and the regulation of GDPR where it cannot be interpreted otherwise based on the context, the terms used in low-case letters in these Rules shall mean the following:

affected person	means the natural person whose personal data the Company processes specifically but not exclusively a) the person who establish business relationship with the Company; b) the person who contact the Company via the Homepage; c) the visitors of the Homepage.
b u s i n e s s advertisement	information, statement, method of appearance, aimed at promoting the sales or other usage of marketable movables that can be possessed – including money, securities and financial assets and natural resources that can be utilised as things – (hereinafter jointly: the product), services, real estates, rights constituting asset value (hereinafter all of these jointly: goods) or, in connection with this objective, aimed at popularising the name, trademark, activities of the corporation or goods or brands;
controller	means 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;
consent/ approval	of the data subject means 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;
data processing	means 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;
data management	fulfilling technical tasks connected to data processing operations independently of the method and tools used for their realisation and the place of usage, provided that the technical tasks are realised with data;
destruction	the complete physical destruction of data carrier containing the data;
data transfer	making the data available to a specified third party;
data erasure	making data unrecognizable in a way that their restoring is not possible any longer;
data blocking	providing data with identification marking in order to limit its further management definitely or for a specified period; instead of erasure, the Company blocks the data where the definite erasure of the data would breach the lawful interests of the affected person; blocked data shall be treated exclusively as long as the objective of data management exists, which excluded the erasure of the personal or sensitive data;
disclosure	making the data available to anyone;
objection	the statement of the affected person by objecting the processing of its personal data and by which it requests the erasure of the processed data;
personal data	means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one 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;
personal data breach	means 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

personal identification data	the first and last name, maiden name, of the affected person, its sex, place and date of birth, its mother's birth first name and last name, permanent address, place of stay, social security identification mark jointly or any of them which is or may be suitable for identifying the affected person;
pseudonymisation	means 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
processor	means a natural or legal person, public authority, agency or other body which manages personal data on behalf of the controller;
sensitive data	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;
third party	means 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;

2.3. If it is not concluded differently from the text otherwise:

- (a) reference to any legal regulations in these Rules includes the incidental later modified, expanded, uniform structure of the legal regulation in question;
- (b) in these Rules the titles and paragraph numbers serve exclusively reference and they shall be considered only together with the interpretation of the text of these Rules;
- (c) all references to a person in these Rules mean reference to any person, company, association, government, state, state institution or authority;
- (d) any of the provisions of these Rules shall not be interpreted in a way that it would exclude the liability or legal remedy for fraudulent statements or procedures or statements or procedures made or initiated in bad faith.

3. NAME AND CONTACT INFORMATION OF THE CONTROLLER

3.1. Name of the Company as controller: **Let Me Inn Korlátolt Felelősségű Társaság**

3.2. Seat of the controller: 1025 Budapest, Napsugár lépcső 13.

3.3. Mail (postal) address of the controller: 1025 Budapest, Napsugár lépcső 13.

3.4. Registration number of the controller: 01-09-271066

3.5. VAT number of the controller: 25367504-2-41.

3.6. E-mail address of the controller: [...] The affected person shall acknowledge that the Company will receive only the questions, complaints of the affected person relating to its own data processing or to these Rules at the above e-mail address.

4. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

4.1. The Company shall process the personal data lawfully, fairly and in a transparent manner only for specified purposes determined in these Rules.

- 4.2. The Company shall only process the personal data in order to achieve the data processing purposes specified in these Rules. The controller shall process personal data for purposes other than those specified in these Rules on the basis of the affected persons consent.
- 4.3. The controller processes personal data only for the purposes specified in these Rules and in applicable law. The personal data shall be processed for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- 4.4. In all cases where personal data is used by the controller for purposes other than the original purpose of the data processing, the controller shall inform the affected person of such data processing, and shall obtain the prior express consent of the affected person, as well as shall ensure the affected person the opportunity to prohibit the use of such personal data.
- 4.5. The controller shall not verify the personal data provided. The person who provided the personal data shall be responsible for the adequacy of the personal data provided.
- 4.6. Where the affected person is a child below the age of 16 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child. The Company shall make reasonable efforts to verify in such cases that consent is given or authorised by the holder of parental responsibility over the child, taking into consideration available technology.
- 4.7. The controller shall not transfer the personal data to third parties excluding the data transmission to processors determined in these Rules, and excluding the other data transmission cases specified in these Rules. The use of personal data for statistical purposes in which personal data is not suitable for identifying the affected person are exceptions to this provision and it cannot be determined as data processing or data transmission.
- 4.8. In some special cases - official request of court or police, legal proceedings for copyright, property or other violations of law, or reasonable grounds to suspect of such violation of the interests of the controller, endangering the services provided by the Company, etc. - the controller shall disclosure personal data to third parties.
- 4.9. The controller shall notify the affected person and those whom personal data have previously been transferred for the purpose of data processing of the rectification, restriction or deletion of the personal data. The notification may be omitted if it does not violate the legitimate interest of the affected person with respect to the purpose of the data processing.
- 4.10. The controller shall ensure the security of the personal data, and shall take all technical and organizational measures and establish the procedural rules ensuring that the data recorded, stored or managed are protected or prevented from their accidental loss, unlawful destruction or unauthorized access, unauthorized use and unauthorized alteration, unauthorized distribution.

5. OBJECTIVE OF DATA PROCESSING, PURPOSES OF PROCESSED DATA, AND DURATION OF DATA PROCESSING

5.1. Data processing regarding the personal data provided by the affected person on the Homepage

5.1.1. Objective of data processing, and processed data:

5.1.2. The affected person can contact the Company on the Homepage. The Company shall process the personal data provided by the affected person on the Homepage on the purpose that (i) the Company can ensure the relations between the affected person and the Company; (ii) the Company can provide the users with its services efficiently, safely and in a customized way; (iii) the Company can participate as a mediator during the settlement of disputes that may emerge in connection with the use of the Homepage; (iv) the Company can provide clarification; (v) the Company can eliminate problems of operation; (vi) the Company can send newsletters and other marketing advertisements; (vii) the Company can collect information for statistical purposes; and (viii) the Company can collect information for research purposes. In harmony with the provision Info Law 5. § (1), and GDPR Article 6 1. a) the Company as data controller shall be entitled to process the following personal data subject to the freely given, specific, informed and unambiguous consent of the affected person:

(a) first and last name

- (b) e-mail
- (c) telephone number

5.1.3. Purpose of data processing:

Consent shall be given providing the required personal data and checking the “checkbox” reserved for the consent for data processing.

5.1.4. Duration of data processing

The processing of the above listed personal data begins with the provision of personal data and lasts until its erasure. Affected person may at any time request the erasure or modification of his/her personal data via email address [adatkezeles.letmeinn@gmail.com]. Upon receipt of the request, the Company shall be obliged to erasure the personal data of the affected person from its system definitely which cannot be restored any longer. The deadline for the erasure is 5 (five) business days from the receipt of the request. The above provisions shall not affect the fulfilment of preservation liabilities specified in legal regulations and the data processing based on further consent given by the affected person.

5.2. Data processing related to advertising activities

5.2.1. Pursuant to Section 6 paragraph (1) of Advertising Law, advertisement for the purpose of direct marketing by direct contact of a natural person as a recipient of advertising (such as electronic mail or other equivalent individual communication tool, with the exception of the postal item sent by the addressee) may be communicated only if the recipient has given prior, unambiguous, and express consent to it. In harmony with the applicable law and the consent of the affected persons, the Company shall be obliged to maintain a record of the personal data provided by the affected persons who has given his/her consent. Data recorded in this register - regarding the recipient of the advertisement - may only be processed in accordance with the consent statement, until it is revoked, and may be transferred to third parties only with the prior consent of the affected person or in case if it is permitted by law

The affected person shall therefore authorize the Company and may agree that the Company shall inform the affected person about its services by direct mail or other tools of communication (telephone, e-mail, SMS, etc.) and shall agree that the Company process his/her personal data for such purpose. The affected person may, at any time, forbid - without limitation or justification - the Company to send him/her direct marketing promotional material, and may at any time and free of charge withdraw his/her consent to send such promotional letters and to process of his/her personal data on the purpose of marketing. The affected person may declare his/her claim in this manner to the Company through the contact details specified in these Rules and through any other contact details listed on the mailings of the Company. In this case, the client will no longer be contacted by the Company for advertising purposes.

5.3. Data processing on the Homepages of the Company

5.3.1. The system used by the Company will identify the computer of the users of the Homepage by so-called cookies. In order that all contents of the Homepage can be viewed, the user should approve the cookies. Therefore, when downloading certain parts of the Homepage, cookies will be placed on the user's computer, which are necessary for the operation of each function of the Homepage. Cookies are small text files, which are saved by the computer and the browser and the user will not receive any information on that from the Company. Cookies are not suitable for identifying the person of the user and they live only during the session. The objective of the Company with placing the cookies is to send essential information to the visitors in a targeted way. The above information shall be used by the Company exclusively to grant the operation of the Homepage, to send targeted newsletters, marketing-, and advertising messages to the users and for statistical purposes.

5.3.2. The user shall acknowledge that by using the Homepage, the user approves expressly that the Homepage uses cookies for marketing (remarketing), by the aid of which the Company can send customised advertisements to the users via the Internet. The User can prohibit the usage of the above cookies on the advertisement setting page of Google. Most browsers are

set to accept cookies by default, but the user has the option to change the browser settings to receive only certain cookies or not to accept cookies at all. The user acknowledges that by disabling cookies, the user may not be able to use all features of the Homepage. The user can also use the browser settings to delete the cookies already stored in his browser. The user can also set his browser to inform the user before cookies are stored. Because different browsers may have different features, please allow the user to use your browser's help for setup options

The following 4 (four) categories of cookies are used by the Company on the Homepage:

- Cookies that are absolutely necessary
- Performance cookies
- Functionality / customization cookies
- Temporary cookies
- Targeting cookies

- 5.3.3. While browsing the Homepage, technical information is recorded (e.g. in the form of log files, which include the user's IP address, the date and time, the URL of the visited page). The system logs such information continuously, but it will not connect it to the information provided during usage. The users will not but only the Company will access to information collected in this way. The Company shall use the above information exclusively for the technical operation and for statistical purposes of the Homepage.
- 5.3.4. During the operation of the Homepage, automatically, technically recorded data may be stored in the system for a reasonable period from the time of their generation to ensure the operation of the system. The controller ensures that these automatically recorded data cannot be interconnected with other personal data, except in cases that are legally binding. If the user has terminated his or her consent to the management of his or her personal data or has been unsubscribed from the service, then his/her personal data will not be identifiable excluding for investigation authorities or for their experts.
- 5.3.5. While browsing the Homepage, anonymous recording of the user's activities on the Homepage may be made, which may be analysed by the Company for the purposes set out in this chapter (eg, what users have clicked, how much time they spent, at which step they left the Homepage). The user can find detailed information on the above on the website of the service provider (<https://www.hotjar.com/legal/compliance/gdpr-commitment>).
- 5.3.6. **The data processing is based on the above-mentioned purposes of the legitimate interests pursued by the controller in accordance with Article 6 (1) (f) of GDPR. In case the data processing is based on the consent of the affected person, then the consent of the affected person shall be provided by the information banner ("cookie banner") on the Homepage.**
- 5.3.7. **If the personal data listed in this section or the data transmitted by cookies are no longer necessary to achieve the objectives of this section, then the data will be erased after 180 (one hundred and eighty) days. In individual cases, the data may be further stored if required by applicable law.**

6. GENERAL REGULATIONS OF DATA PROCESSING

- 6.1. The Company informs the user that no process of sensitive data takes place.
- 6.2. It is the voluntary decision of the affected person whether or not to give the personal data included in paragraph 5 of the Rules to the Company but without the recording of personal data specified in above most of the services provided by the Company cannot be used by the user. In case the user gives the data of a third party while using the services of the Company or in case the user causes any harm, the Company shall be entitled to claim compensation for damages from the user. The Company will not verify the personal data given to the Company. Exclusively the person providing the data shall be liable for the authenticity, truth of the provided data. Any user, when providing its e-mail address and telephone number shall undertake liability for that only this person that has provided the contact information will use the services from the e-mail address.
- 6.3. The Company may request the affected person to provide other personal data as well subject to the condition that the Company shall specify the purpose of data processing before requesting so. Recording personal data shall be voluntary in each case and if certain personal data is not provided this fact shall not influence the services provided by the company.

- 6.4. Should the Company process personal or sensitive data of the affected person pursuant to any provisions of laws, then the Company shall inform the affected person on such data management operation, the purpose and duration of the operation before executing the – by also specifying the legal reference. Before requesting any personal data, the Company shall inform the affected person that the provision of the data in question is voluntary and based on the approval of the affected person or it is compulsory and is based on legal regulations.
- 6.5. The Company shall be entitled to use the personal data in a way that the data shall be deprived of its relationship to the affected person and for statistical purposes. The Company undertakes that it will be impossible to connect such data to any of the affected persons after their statistical processing.
- 6.6. The user shall acknowledge that the Company may process the provided personal data with the aim of safety data agreement, may request the copy of the user's personal identity card with the aim of controlling the authenticity of personal data which the user can send to the Company either in a scanned form via e-mail or by regular mail but which shall be subject to special data processing approval. The Company shall store the personal data recorded during safety data control in its protected information system and only temporarily and after the completion of the safety data control the Company shall destroy the photocopy sent by the user. The Company shall inform the user on the purpose and further conditions of data processing realised via safety data control when requesting the information. The user shall acknowledge that courts, prosecutors, investigation authorities or authorities of minor infractions might contact the Company with the aim of requesting, transferring personal data or making documents available to them. The Company shall disclose to authorities personal data only in a quantity and to an extent, which is definitely necessary for achieving the purpose of the request upon the lawful requests from authorities – if the authority has specified the accurate purpose and the scope of information.
- 6.7. **Where processing is based on consent affected person shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. The processing shall be continued if there is any other legal basis of data processing.**
- 6.8. If the court or other authority has ordered the erasure of the personal data, the erasure shall be executed by the controller. Based on the express request of the affected person or in case the information available suggests that the erasure would infringe the legitimate interest of the affected person, instead of the erasure, - following the notification of the affected person - the data controller restricts the use of personal data. Personal data shall not be erased by the controller until the purpose of the data processing that excludes the erasure of personal data exists.

7. ACCESS TO THE PROCESSED DATA, DATA MANAGEMENT AND DATA TRANSFER

7.1. Access to the processed data

Primarily the Company and the internal employees of the Company shall be entitled to know the personal data and they shall not publish or disclose the personal data to any third parties and they shall use the personal data for the purposes specified in the Rules.

Within the scope of operation of its information system, the Company may use the services of a data processor person (e.g. system operator, system administrator).

The Company shall be entitled to transfer the user's personal data to its subcontractors. Before selecting its partners, the Company prepared such selections with utmost care. Such partners shall treat the confidential information acknowledged by them when fulfilling their liabilities and providing their services, subject to the provisions of legal regulations.

7.2. Data management

7.2.1. The Company as controller shall determine the rights and obligations of the data processor in connection with the management of personal data in harmony with the GDPR and the special laws on data management. The Company shall be responsible for the legality of the instructions given by it as a data controller. The data processor shall not make a substantive decision concerning the data management, the personal data which it has become aware of may be processed only in accordance with the provisions of the Company as a data controller, the data processor may not process data for its own purposes, and shall store and preserve personal data in accordance with the provisions of the Company as data controller.

- 7.2.2. The controller supervises the work of the data processors. The Company may use an additional data processor to process, analyze and evaluate the data in its research activities. Data processors shall only be entitled to use a further data processor with the consent of the data controller
- 7.2.3. The controller shall be entitled and obliged to forward to the competent authorities all regularly stored personal data in accordance with the law, which is required by law or by a legally binding authority. Due to such data transmission and the resulting consequences, the controller cannot be held responsible. The release of personal data to a third party or authority - unless otherwise provided by law - is possible only on the basis of an official decision or with the prior express consent of the affected person.
- 7.2.4. Data transfers to data processors specified in these Rules may be made without the express consent of the affected person. On behalf of the Company the above listed processors manage personal data:

Name and seat of processor	Tasks of processor and managed personal data

7.3. Data transfer

- 7.4. Based on the express permission of the affected person to do so, the controller shall be entitled to transfer the personal data indicated in the permission to the third party indicated in the permission for the purpose and for the period of time specified in the permission. The processing of the transmitted data is governed by the provisions of data processing of third party.
- 7.5. The controller shall be obliged to maintain a data transfer record to verify the legality of the data transmission and to ensure that the affected person is informed properly.
- 7.6. The Company shall not transfer personal data to a non-EEA country (third country) unless the affected person has explicitly agreed to it, or if the data processing requirements of the law and the protection of personal data are ensured in the third country.
- 7.7. Without the consent of the affected person data transfers to third parties may only take place based on permission by law.

8. DATA SECURITY

- 8.1. The Company stores personal data digitally. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, in particular to prevent unauthorized access, alteration, transmission, disclosure, deletion or destruction, and to prevent accidental destruction and injury.
- 8.2. The Company shall take all the measures necessary for ensuring the safety of personal data given by the users on during network communication, data storage and guarding. Access is strictly limited to personal data in order that illegal learning, illegal change and usage of personal data can be prevented. The information system and network of the Company is protected appropriately against fraud, spying, sabotage, vandalism, fire, flood, computer bugs, computer breaking that might take

place during computer usage. At the same time in harmony with to the applicable legal limitations, the Company excludes its liability for data loss or damage caused by computer attacks that are beyond its control or by crimes committed by third parties.

- 8.3. When processing data, the Company shall preserve (1) secrecy: the Company protects personal data in a way that access to it can be possible to persons that are authorized to do so; (2) integrity: the Company protects the integrity and the accuracy of processing of personal data.

9. RIGHTS OF THE USERS

9.1. Right of information and access to personal data

9.1.1. The controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:

- (a) the identity and the contact details of the controller and, where applicable, of the controller's representative;
- (b) the contact details of the data protection officer, where applicable;
- (c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
- (d) where the processing is based on point (f) of Article 6(1) GDPR, the legitimate interests pursued by the controller or by a third party;
- (e) the recipients or categories of recipients of the personal data, if any;
- (f) where applicable, the fact that the controller intends to transfer personal data to a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47 of GDPR, or the second subparagraph of Article 49(1) of GDPR, reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.

9.1.2. In addition to the information above, the controller shall, at the time when personal data are obtained, provide the data subject with the following further information necessary to ensure fair and transparent processing:

- (a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- (a) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability
- (b) where the processing is based on consent, the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- (c) the right to lodge a complaint with a supervisory authority;
- (d) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data.

9.1.3. The affected person shall have the right to obtain from the Company confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- (a) the purposes of the processing;
 - (b) the categories of personal data concerned;
 - (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
 - (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
 - (f) the right to lodge a complaint with a supervisory authority;
 - (g) where the personal data are not collected from the affected person, any available information as to their source;
 - (h) the existence of automated decision-making, including profiling, referred and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the affected person.
- 9.1.4. Where personal data are transferred to a third country or to an international organization, the affected person shall have the right to be informed of the appropriate safeguards pursuant relating to the transfer.
- 9.1.5. The Company shall provide a copy of the personal data undergoing processing. For any further copies requested by the affected person, the controller may charge a reasonable fee based on administrative costs. Where the affected person makes the request by electronic means, and unless otherwise requested by the affected person, the information shall be provided in a commonly used electronic form.
- 9.1.6. The right to obtain a copy referred to in paragraph 9.1.5. shall not adversely affect the rights and freedoms of others

9.2. Right of rectification of personal data

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

9.3. Right of erasure of personal data („right to be forgotten“)

- 9.3.1. The user shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller 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 user withdraws consent on which the processing is based according to point, and where there is no other legal ground for the processing;
 - (c) the user objects to the processing pursuant;
 - (d) the personal data have been unlawfully processed;
 - (e) the personal data have to be erased for compliance with a legal obligation in EU or Hungarian law to;
 - (f) the personal data have been collected in relation to offer of information society services directly to a child.

- 9.3.2. Where the controller has made the personal data public and is obliged pursuant to the above mentioned to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.
- 9.3.3. Erasure shall be refused (i) for exercising the right of freedom of expression and information; (ii) for compliance with a legal obligation which requires processing by law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; (iii) for reasons of public interest in the area of public health; (iv) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes likely to render impossible or seriously impair the achievement of the objectives of that processing; or (v) for the establishment, exercise or defence of legal claims.
- 9.3.4. Newsletters sent by the controller can be canceled via their unsubscribe link. In case of unsubscription, the data controller deletes the personal data of the affected person in the newsletter database.

9.4. Right to restriction of processing

- 9.4.1. The affected person 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 affected person, for a period enabling the Company to verify the accuracy of the personal data;
 - (b) the processing is unlawful and the affected person 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 affected person for the establishment, exercise or defense of legal claims;
 - (d) the affected person has objected to processing pursuant pending the verification whether the legitimate grounds of the controller override those of the data subject.
- 9.4.2. Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the affected persons consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the EU or of Hungary.
- 9.4.3. An affected person who has obtained restriction of processing shall be informed by the Company before the restriction of processing is lifted.

9.5. Right to data portability

- 9.5.1. The affected person shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

9.6. Right to object

- 9.6.1. 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 point (e) or (f) of Article 6(1) of GDPR, including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
- 9.6.2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

- 9.6.3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
- 9.6.4. At the latest at the time of the first communication with the data subject, the mentioned above shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.
- 9.6.5. The data subject may exercise his or her right to object by automated means using technical specifications.
- 9.6.6. Where personal data are processed for scientific or historical research purposes or statistical purposes, the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

9.7. Notification obligation regarding rectification or erasure of personal data or restriction of processing

- 9.7.1. The controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

9.8. The affected person can exercise his/her above listed rights on one of the following contacts:

Name: Let Me Inn Korlátolt Felelősségű Társaság
E-mail: [adatkezeles.letmeinn@gmail.com]
Postal address: 1025 Budapest, Napsugár lépcső 13.

10. OBLIGATIONS OF THE USERS

- 10.1. The affected person shall provide true, authentic personal data and – if any of the pieces of data is changed – shall correct the personal data or ask the Company to correct the information.
- 10.2. The Company, without any further notice, reserves the right to itself to erasure the data of an affected person that abuses the personal data of another person.
- 10.3. By accepting the Rules, the affected person shall acknowledge that during the usage of the Homepage, he/she shall not share content or shall not send messages, which
- (a) breaches other people's honor, dignity;
 - (b) impeaches other persons for their national, ethnic origin race, affiliation to a religious group or presumed debt;
 - (c) impeaches any services, business companies, without grounds, in bad faith or with the aim of discrediting.
- 10.4. The Company will erasure such personal data immediately and call the affected person to fulfil the above requirements. Should the affected person behave in the same way, by breaching the above rules after the notice, the Company, without any further notice, reserves the right to itself to erasure the data of the affected person.

11. RECORDS OF PROCESSING ACTIVITIES

- 11.1. The Company and, the Companies representative, shall maintain a record of processing activities under its responsibility. That record shall contain all of the following information:
- (a) the name and contact details of the controller and, where applicable, the joint controller, the controller's representative and the data protection officer;
 - (b) the purposes of the processing;
 - (c) a description of the categories of data subjects and of the categories of personal data;

- (d) the categories of recipients to whom the personal data have been or will be disclosed including recipients in third countries or international organisations;
- (e) where applicable, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in the case of transfers referred to in the second subparagraph of Article 49(1) of GDPR, the documentation of suitable safeguards;
- (f) where possible, the envisaged time limits for erasure of the different categories of data;
- (g) where possible, a general description of the technical and organisational security measures referred to in Article 32(1) of GDPR.

11.2. The Company and the Company representative shall make the record available to the supervisory authority on request

12. PERSONAL DATA BREACH

12.1. In the case of a personal data breach, the Company shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay

12.2. The notification referred to in paragraph 12.1. shall at least:

- (a) describe the nature of the personal data breach including where possible, the categories and approximate number of data subjects concerned and the categories and approximate number of personal data records concerned;
- (b) communicate the name and contact details of the data protection officer or other contact point where more information can be obtained;
- (c) describe the likely consequences of the personal data breach;
- (d) describe the measures taken or proposed to be taken by the controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects.

12.3. Where, and in so far as, it is not possible to provide the information at the same time, the information may be provided in phases without undue further delay.

12.4. The controller shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken.

12.5. When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Company shall communicate the personal data breach to the affected person without undue delay.

12.6. The communication to the data subject referred to in paragraph 1 of this Article shall describe in clear and plain language the nature of the personal data breach and contain at least the information and measures referred to in points 12.2. (b), (c) and (d).

12.7. The communication to the affected person shall not be required if any of the following conditions are met:

- (a) the Company has implemented appropriate technical and organisational protection measures, and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- (b) the Company has taken subsequent measures which ensure that the high risk to the rights and freedoms of affected person is no longer likely to materialise;
- (c) it would involve disproportionate effort. In such a case, there shall instead be a public communication or similar measure whereby the affected persons are informed in an equally effective manner.

12.8. If the Company has not already communicated the personal data breach to the affected person, the supervisory authority, having considered the likelihood of the personal data breach resulting in a high risk, may require it to do so or may decide that any of the conditions referred to in clause 12.3. are met

13. **LEGAL REMEDY**

13.1. If the affected person believes that the Company by the data processing realised by itself breached these Rules or the prevailing legal regulations, then, in order to stop the presumed unlawful data processing, the affected person shall contact Nemzeti Adatvédelmi és Információszabadság Hatóság (Hungarian National Authority for Data Protection and Freedom of Information) (address: 1125 Budapest, Szilágyi Erzsébet fasor 22/ . Mail address: 1387 Budapest Pf. 40.).

13.2. The affected person shall be entitled to initiate a legal procedure against the Company where it believes that the rights regulated the Rules are breached by the Company. The court shall act in urgency. The tribunal shall have jurisdiction in the litigation – according to the affected person’s decision – based on the home address of the affected person or the seat of the Company.

14. **MODIFICATION, INTERPRETATION, EFFECTIVE DATE OF THE RULES**

14.1. With sending electronic notice to the affected persons – the Company reserves the right to itself to modify these Rules unilaterally.

14.2. The Company states that all the modifications of the Rules will be compliant to the provisions on data protection of the legal regulations in effect on the date of modification.

14.3. The Company states that the Rules must be interpreted in harmony with the legal regulations in effect on the date of interpretation of the Rules. Should there be discrepancies between the Rules and the legal regulations in effect, the provisions of the legal regulations in effect shall be ruling.

14.4. The effective date of these Rules is [2019. January 1.].

