

## PRIVACY STATEMENT

### 1. INTRODUCTION

Dean's College Hotel operates activities in the business of hospitality, which includes offering student house and student hotel rooms, facilities (laundry, gym, reception, etc.) and communal spaces. In the Dean's College Hotel is committed to protecting the privacy of all guests who interact with us at any moment during their stay. We treat all the personal data of our guests with great care and we always act in accordance with the applicable national and international data protection legislation including the General Data Protection Regulation (GDPR).

This privacy statement is designed to fully inform you about our privacy practices including the collection of personal data, how we use it and the rights that exist for you to fully be in control of it. We love to interact with our guests so that we can learn and continue to improve the services we offer to the Dean's College Hotel community, which means data is exchanged and used on many occasions including: when you visit our websites, make a reservation or visit the Dean's College Hotel, communal spaces, the gym or any other property that belongs to the Dean's College Hotel.

### 2. WHO WE ARE

This Privacy Statement applies to the processing of personal data by FT56 Student Hotel Kft. and more specifically the relevant subsidiary that determines the particular purpose of the personal data they process.

FT56 Student Hotel Kft. is a limited liability company registered under the laws of Hungary with its statutory seat in Budapest, Hungary and its office at H-1054, Szabadság tér 7., registered with the Company Registry Court of Budapest under number 01 09 351254. FT56 Student Hotel Kft. is the legal entity that acts as the primary data controller.

### 3. CHANGES

We may change this Privacy Statement to reflect changes at any time. The most recent version of the Privacy Statement is reflected by the version date located in the top left of this document. All updates and amendments are effective immediately upon notice, which we may give by posting a revised version of this Privacy Statement the Website. We encourage you to review this Privacy Statement often to stay informed of changes that may affect you, as your continued use of our services signifies your continuing awareness of this Privacy Statement.

### 4. WHAT CATEGORIES OF PERSONAL DATA DO WE COLLECT AND WHY?

The type of data that Dean's College Hotel collects and what we do with it depends on how it was collected and the type of service you have signed up to enjoy. For example:

Browsing Dean's College Hotel websites

If you visit the Milestone website, we use cookies, which we store on your computer, phone or tablet. Cookies are small text files, and we use the information contained in these files for the essential functioning of our sites, non-essential functions to improve user experience, performance / analytics and advertising. Dean's College Hotel use various analytic services, such as:

- Google Analytics

These services use cookies and to a large extent concern anonymized data to help us analyse how you users use the websites so that Dean's College Hotel can improve the functionality and the content.

#### ***WHEN YOU MAKE A HOTEL BOOKING AS A SEMESTER GUEST***

When you make a reservation as a semester guest, you may be required to provide Dean's College Hotel with your name, your home address, place of birth, nationality, ID/passport number, and a copy of the registration of your university. Furthermore, you must provide us the personal details of your parents and/or guarantor ensuring that they are aware that such data will be shared. These details will be used to process the booking, billing purposes, communication about the reservation, in the event of an emergency and sending surveys to understand how we can improve the services offered.

If applicable within 3 weeks of check-in you have to provide Dean's College Hotel with evidence of your registration with local municipality (if applicable). The evidence may include your individual identification number.

#### ***WHEN ATTENDING DEAN'S COLLEGE HOTEL EVENTS AND USING THE HOTEL FACILITIES***

When you attend events and make use of the Dean's College Hotel facilities you may be requested to provide various personal data for example using the photoboosts in the lobbies.

This information will be used for the processing activity specified when giving the personal data. It may also be used to send general marketing emails about other Dean's College Hotel news, events and deals but only if you have given us consent to do so by giving consent to receive such information.

#### ***AFTER YOUR DEAN'S COLLEGE HOTEL EXPERIENCE***

After what we hope is only your first Dean's College Hotel experience, we will continue to store your personal data in a profile. Should you return to Dean's College Hotel in the future, we want to be able to offer the best possible service, including the ability to customize your stay based on your previous personal preferences. We will only do this to the extent that we believe we have a legitimate interest to do so which in every case will be to improve the service we can offer to you in the future.

The data collected will therefore be kept for as long as we believe you may return to Dean's College Hotel or until you communicate your right to be deleted.

We will also continue to send you marketing e-mails to keep you updated if you have previously giving consent for us to do so and will continue to do so for as long as we believe the content is valid and of interest to you. You can of course unsubscribe anytime you like by following the link contained in the bottom of the email.

## **5. LEGAL GROUNDS FOR THE PROCESSING ACTIVITIES IDENTIFIED**

### ***BASED ON THE CONTRACTUAL AGREEMENT***

To manage your booking through any of the channels provided to this effect and to process your registration as a Dean's College Hotel guest, and for the subsequent business relation with you, as well as

Managing, maintaining and effectively controlling the relationship resulting from having contracted the Dean's College Hotel goods or services.

To proceed to charge the designated amounts in the event of a booking cancellation outside the established time frame, as appropriate.

To manage guests stay at Dean's College Hotel , in addition to providing the services requested during their visit, which includes, among other aspects, preparation of the visit and dealing with any requests made during their stay. For this purpose, we may request data, such as, room requests and organize directions. This also includes invoicing and charging for services consumed during their stay.

#### **BASED ON LEGAL OBLIGATIONS**

- a. Notify the public authorities or regulatory or government bodies in those cases where it is necessary to so under law, local by-laws or in compliance with regulatory requirements.
- b. Legally obligated by law to collect and process personal data (e.g. maintain a hotel guest night register)

#### **BASED ON DEAN'S COLLEGE HOTEL LEGITIMATE INTERESTS**

- a. Carry out commercial actions and/or advertising communications through any medium including electronic or equivalent communications relating to goods or services like those contracted with Dean's College Hotel .
- b. Create profiles based on the personal data available to Dean's College Hotel to ascertain the goods and services most appropriate to your profile, thus maximizing their results and in this way offering you the best of any goods and services of interest to you.
- c. To carry out customer satisfaction surveys with the goods and/or services you have contracted to assess your satisfaction so that Dean's College Hotel can improve its processes and services.
- d. To manage, process and respond to any possible complaints or claims. To record your voice and/or image and save the telephone conversation and/or video having expressly informed you of this fact. It is in the Dean's College Hotel legitimate interests to maintain the quality of its service and to use the recordings, should it be necessary to protect its legal position in the event of any possible conflict.
- e. To send operational relevant information about the Dean's College Hotel product you have purchased or event you have attended.

#### **BASED ON YOUR EXPLICIT CONSENT**

- a. Should you so authorize (typically using an opt—in tick box), Dean's College Hotel may send marketing material about goods and services other than those that you have contracted or subscribed. Dean's College Hotel may contact you about relevant good and services after a contractual relationship has ended.
- b. Should you so authorize on the cookies banner. Dean's College Hotel may monitor cookies and use that information to advertise products/services that may be of interest to you.

#### **6. WHO HAS ACCESS TO YOUR PERSONAL DATA?**

We handle your personal data discreetly and will process the personal data only for strictly our own purposes. We will never sell or give your personal data to third parties without explicit prior consent. We will only transfer your personal data to third parties if it is necessary for us to fulfil our contractual obligations towards you, when it is necessary to perform functions you have granted consent for us to do or any other identified

legal ground under data protection law. The third parties we work with are bound by the same conditions toward you and your personal data as written in this privacy statement.

## **7. YOUR RIGHTS**

We want to make sure that you are fully in control of your personal data. You have multiple rights and we want to ensure they are respected. If you wish to exercise any of the rights listed below, please make your request by sending an e-mail to:

- [info@deanscollegehotel.com](mailto:info@deanscollegehotel.com)

Please state clearly in the subject heading what type of request you are making including as much detail as you can to assist us complete your request as quickly as possible. Please confirm as a minimum:

- Type of Dean's College Hotel service you signed up for (Hotel, Collab or the Commons)
- Location
- Supporting evidence to help identify the correct profile (e.g. booking confirmation)
- A copy of your ID to confirm the request initiator is the data subject concerned

We will complete your request within 4 weeks.

### ***RIGHT OF ACCESS***

If you want to know what personal data we have collected and/or processed from you, you can request Dean's College Hotel to provide an overview. We will provide you with an overview of your personal data that we collect and/or process.

### ***RECTIFICATION***

If you believe that the personal data that we process is incorrect, inaccurate or incomplete, you may ask us to change or remove such personal data.

### ***ERASURE ('RIGHT TO BE FORGOTTEN')***

If you want us to remove the personal data we have collected and/or processed from you, you can request Dean's College Hotel to erase your personal data.

### ***RESTRICTION***

Instead of requesting erasure, you may also request us to restrict the way we are processing your personal data. Restriction can be requested i.e. in case the personal data is inaccurate, unlawful, or pending a decision of a complaint lodged by you. If you restrict us from processing, we will only further process your data with your consent.

### ***PORTABILITY***

If you want to transfer the processed personal data to another controller of your choice, you may request us to provide you with a copy of your personal data in a structured, commonly used, and machine-readable format.

### ***OBJECT***

You have always the right to object against the processing of your personal data by Dean's College Hotel. If it concerns a processing activity that requires consent you are always entitled to remove your consent.

### ***LIMITATIONS OF YOUR RIGHTS***

When a data subject request is made Dean's College Hotel will as a standard policy provide this service free of charge, however in exceptional cases Dean's College Hotel reserves the right to charge a reasonable fee. Data subject requests will only be implemented after the individual making the request has proved their identity,

which confirms that they are indeed the subject that the request concerns. This can be achieved by sending a copy of a passport from the e-mail account that used when signing up to a Dean's College Hotel service.

Finally, in certain situations Dean's College Hotel may be entitled to legally refuse requests. If Dean's College Hotel believe there are legitimate grounds that override the interest of the data subjects request, then Dean's College Hotel may reasonably refuse to fulfill the request. Dean's College Hotel will always justify in writing why that is the case.

#### ***RIGHT TO CONTACT THE SUPERVISORY BODY***

If you believe your data request is not being handled correctly you are entitled to contact the Dean's College Hotel lead national data supervisory body. The appropriate authority in Hungary is:

Nemzeti Adatvédelmi és Információszabadság Hatóság

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

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

#### **8. HOW DO WE PROTECT YOUR PERSONAL DATA?**

Dean's College Hotel takes the security of personal data seriously and has implemented the following security measures:

***Physical Access Controls:*** Dean's College Hotel have taken reasonable measures to prevent physical access, such as security personnel and secured buildings to prevent unauthorized persons from gaining access to Personal Data or have ensured third party partners operating data centers on our behalf are adhering to such controls.

***System Access Controls:*** Dean's College Hotel have taken reasonable measures to prevent Personal Data from being used without authorization. The controls vary based on the nature of the processing undertaken and may include, among other controls, authentication via passwords and/or two-factor authentication, documented authorization processes and logging of access on several levels.

***Data Access Controls:*** Dean's College Hotel take reasonable measures to provide that Personal Data is accessible and manageable only by properly authorized staff: application access rights are established and enforced to ensure that persons entitled to use a system only have access to the Personal Data to which they have privilege of access and a companywide policy that Personal Data cannot be read, copied, modified or removed without authorization in the course of processing.

***Transmission Controls:*** Dean's College Hotel have taken reasonable measures to ensure that it is possible to check and establish to which entities the transfer of Personal Data by means of data transmission facilities is envisaged so personal data cannot be read, copied, modified or removed without authorization during electronic transmission or transport.

***Input Controls:*** Data Processor shall take reasonable measures to provide that it is possible to check and establish whether and by whom personal data has been entered into data processing systems, modified or

removed. Data Dean's College Hotel have taken reasonable measures to ensure that (i) the Personal Data is always under Dean's College Hotel control and (ii) Personal Data is managed by secured transmission.

**Data Backup:** Back-ups of the databases are taken on a regular basis, are secured and encrypted to ensure that Personal Data is protected against accidental destruction, loss or unauthorized disclosure.

**Logical Separation:** Data collected for different Dean's College Hotel services and purposes is logically segregated in Dean's College Hotel systems to ensure that Personal Data that is collected and processed for the particular purpose it was collected for by Dean's College Hotel

**Security Audit:** External security audits are performed periodically. Dean's College Hotel are implementing a maturity plan that will continuously improve security standards and work towards a standardized ISO certification.

## **9. TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES**

For many of our business purposes we use cloud-based services. Therefore, for technical and organizational reasons, it may be necessary that your personal data is transferred to servers located in other countries outside of the European Economic Area. Dean's College Hotel implemented internal processes to ensure that your personal data will only be sent to parties and/or countries with an adequate level of personal data protection.

## **10. LINKS TO OTHER WEBSITES**

The Websites may contain links to other websites we do not control. Therefore, we will not be liable for the content of these websites, nor for the processing of personal data that may occur on these websites.

## **11. QUESTIONS**

If you have any questions about this Privacy Statement, please email:

[info@deanscollegehotel.com](mailto:info@deanscollegehotel.com)