

## **INFORMATION ABOUT OPERATING CAMERAS**

In the Student Hotel Budapest area (1094 Budapest, Tűzoltó utca 50-56) operated and maintained by FT56 Student Hotel Kft. (Registered seat: 1054 Budapest, Szabadság tér 7., company registration number: 01-09-351254; hereinafter referred to as "Data Controller") operates an electronic monitoring system (Cameras).

In view of this and in accordance with the relevant legal provisions [1] we inform you about the followings:

### **1. OBJECTIVES AND PRINCIPLES OF THE USE OF CAMERAS**

1.1. The Data Controller is allowed to process image or image and voice recordings recorded by cameras as personal data exclusively in the interest of preserving the life and physical integrity of the guests and employees of Student Hotel Budapest („Concerned Person”), detecting and preventing violation of law, surprising the perpetrator in the act and preserving the equipment and commercial units of Student Hotel Budapest, the personal property of guests and employees (property protection, theft and burglary protection) and in the interest of proving all these and process data only with extent necessary.

1.2. The use of Cameras is bound to a purpose of personal data processing and is indispensable to the achievement of its goals and is suitable to it and is proportionate.

1.3. The use of Cameras is not a violation of dignity of the human being and it complies with the principle of fair data management.

### **2. THE LEGAL BASIS OF DATA PROCESSING**

2.1. In Student Hotel Budapest only persons are allowed to stay who agree to the use of the Cameras and agree to the terms and conditions. Regarding to this, the legal basis of data processing is the consent of person, according to Section 5 § (1)(a) of the Information Act.

2.2. By entering Student Hotel Budapest, despite of the placed disclosure, they implicitly accept that the operated electronic monitoring system takes pictures or records voice recordings.

### **3. PERIOD AND PLACE OF DATA PROCESSING, DATA SECURITY MEASURES, DATA TRANSFER**

3.1. The Data Controller will delete and reverse the recorded camera recordings (if Usage takes place) after 6 months of the date it was recorded (Retention Time), considering that the deadline for arising any claims form the usage of Student Hotel Budapest is 6 months. And within that period The Parties may have a legitimate interest to use the recordings recorded by the cameras for the purpose of demonstrating as an evidence according to Clause 3.2.

3.2. It is deemed as usage of recorded image or voice recordings and other personal data when it is used as evidence in court procedures or in other official procedures (“Usage”).

3.3. If an event occurring on the record of a camera, the camera recording can be used by taking into account the needs of the Data Controller or the Concerned Person (Clause 3.2), the Data Controller shall take a protocol and block the camera recording in accordance with Section 17 § (4) of the Information Act.

3.4. Concerned Person can request by proven the right or legitimate interest concerned (see Clause 8.) that the data should not be set aside or deleted by the Data Controller. The Concerned Person may claim against the Data Controller within the Retention Time according to the terms of the GTC.

3.5. If a Guest asks the Data Controller within the Retention Time, not to delete or setting aside the recordings of the Cameras for the purpose described in Section 3.2 above, so the Data Controller takes a protocol and records the existence of the right or legitimate interest and the circumstances of the case.

3.6. The Data Controller within the Retention Time according to Szvtv. 31. § (6) may decide within its own discretion to preserve or block [2] the images or images/ voice recordings of Cameras together with establishing the existence of the right or legitimate interest for such action and the circumstances of the case by taking a minutes thereof. In this case, the Data Controller takes a protocol and records the existence of the right or legitimate interest and the circumstances of the case.

3.7. At the request of a court or other authority, the recorded image or image and voice recording must be sent to the court or to the authority forthwith. If the request won't take place within 30 days of the request for slight of setting aside, the recorded image or image and voice recording will be set aside or deleted unless the Retention Time has expired.

3.8. The Data Controller is not allowed to transmit the recordings of the Guests or employees to third parties.

#### **4. DATA PROTECTION, AUTHORISED PERSONS TO VIEW AND REVIEW RECORDINGS**

4.1. A Data Controller shall ensure the security of the processed data and take all reasonable measures to protect the privacy of personal data of Guests and employees. For this purpose, the recorded image and voice recording is stored in a locked place on a password-protected computer, saved on a hard disk, ensuring data security.

4.2. Recorded images, images /voice recording are cognizable only by the general managers of the Data Controller or in the case of their hold-back by a generally or occasionally authorized person assigned by them, furthermore for whom the record data are included and entitled to know , who is required to enforce their contractual obligations and it is unavoidable to prevent or interrupt the offending act.

4.3. During the Retention Time the right to know spreads to viewing and reviewing the recordings of Cameras.

4.4. The name of the person shall be recorded in the protocol who collect and manage the recorded image or picture and voice recordings or for any other reason according to this Notice the name of the person performing the personal and property protection activities who is entitled to get acquainted with the reason and the time of knowing the data of recordings.

## **5. LOCATION OF CAMERAS, OBSERVED AREAS**

5.1. The monitoring system consists of Cameras placed on the ceiling structure of Student Hotel Budapest.

5.2. In the office the reason for the placement of cameras is monitoring the money management and office movement.

5.3. The area observed by cameras is a lawfully and exclusively operated place of the Data Controller.

## **6. CHARACTERISTICS OF THE CAMERA MONITORING SYSTEM**

6.1. Cameras are fixed lens cameras for general surveillance purposes.

6.2. Cameras are not suitable for close-up shots of people or activities. The cameras of the electronic monitoring system shoot recordings dominantly about visitors and guests visiting Student Hotel Budapest.

## **7. RIGHTS OF CONCERNED PERSONS**

7.1. Concerned Person may apply the Data Controller to get information about the processing of their personal data, to delete or block camera recordings.

7.2. At the request of the Concerned Person, the Data Controller shall provide information on the processed data of the Concerned Person, the source, the purpose, the legal basis, duration of the data controlling, the data processing related activities of the Concerned Person. And in the case of the transfer of the Guest or the employee's personal data, the legal basis of transfer and their addressee

7.3. The Data Controller shall keep a data transfer record for the purpose of controlling the lawfulness of the data transfer and informing the Concerned Person, including the date of transmission of the personal data it manages, the legal basis and the addressee of the data transmission, and any other data according to the definition of data processing legislation.

7.4. The Data Controller is liable to provide information in an understandable written form, at the request of the Concerned Person in the shortest possible time. This information is free of charge if the requesting information has not yet been submitted to the data controller for the same data field during the current year. In other cases, reimbursement may be established on a case-by-case basis.

7.5. Deletion, Blocking, Marking

Personal data must be deleted if it is illegal to process;

- it is a request of the Concerned Person;
- it is incomplete or incorrect - and this condition cannot be legally remedied, if the deletion is not excluded by law;

- the purpose of data processing has eliminated or the statutory deadline of data storage has expired;
- prescribed by the court or the Authority.

The Data Controller blocks the recording with the personal data,

- a. if the Concerned Person requests it within the Retention Time, or
- b. if, on the basis of the available information, it may be assumed that the deletion would prejudice the legitimate interests of the Concerned Person, or
- c. if, on the basis of the available information, it may be assumed that deletion would prejudice the legitimate interests of the Data Controller.

Such a blocked recording can only be handled as long as the data processing objective exists that excludes the deletion of personal data.

The Data Controller shall take a protocol all the relevant information about blocking the Record, in particular the reasons and legal basis of blocking, the circumstances of possible use of the Record, the potential time of blocking, and the persons affected by the blocking of the recording, if known.

The Data Controller mark the image or image and voice recording being processed by the Data Controller if the Concerned Person disputes its accuracy or correctness, but the inaccuracy or inexactness of the contested personal data cannot be clearly identified.

## **8. LEGAL REMEDY AGAINST THE DATA CONTROLLER**

Concerned Person may contact the competent court and the Hungarian National Authority for Data Protection and Freedom of Information in case of a violation of their data protection rights.

Hungarian National Authority for Data Protection and Freedom of Information

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)

## **9. FINAL PROVISIONS**

The Data Controller has submitted the data processing of the electronic monitoring system to the data privacy register of the Hungarian National Authority for Data Protection and Freedom of Information complied with Section 65. §- of the Information Act. in consideration that on the records recorded by the electronic monitoring system may appear third-party persons (visitors) beside the data controller's employees.

You may find the camera position plan of Student Hotel Budapest at the reception desk.

Applicable as of 1 April 2020.

[1] Act CXXXIII of 2005 (Szvtv.) about the rules of personal and property protection and private detective activity law.

[2] Blocking: Identifying data with mark to restrict their further processing to a definite or a specific time limit.