

Botaniq Collection General Privacy Policy

All hotels, clubs, or restaurants under the Botaniq Collection brand are committed to ensuring the comfort and security of all our guests, which includes protecting their data. In this policy, we would like to outline how we handle and protect your personal data when you stay with us, use our services, or visit our website.

The protection of your data is of paramount importance to us. Therefore, we take all necessary steps to handle your data confidentially and only use it for the purposes outlined here or for which you have expressly consented. Our data management practices comply with the General Data Protection Regulation (GDPR) of the European Union, as well as other local and international data protection laws and regulations.

This policy details the types of personal data we collect, how we use this data, with whom we may share it, and what rights and options you have regarding your data. Please read this policy carefully, and if you have any questions, do not hesitate to contact us.

This privacy policy summarizes the data protection practices concerning data collected by Botaniq Collection. We refer collectively to our websites, applications, and social media pages as "Online Services," as well as visits and offline interactions as "Services."

1. Through our website www.botaniqcollection.com, from which you access this privacy policy.
2. During the registration for the loyalty program and the creation of an online profile, as well as during participation in the program.
3. Through our controlled social media pages (collectively referred to as "our social media pages").
4. Via email messages containing a reference to this Privacy Policy, as well as during online or in-person communication with us.
5. From third parties, such as authorized agents, partners, and other sources, including public databases, marketing partners, and other third parties.
6. When you visit or stay as a guest in any of the hotels, restaurants, or clubs under the Botaniq Collection umbrella, or through other offline interactions (collectively, property visits and offline interactions).

I. **What data do we collect?**

Personal data refers to any information that can identify or be used to contact you, which we collect from you during booking, hotel stays, or other use of our services, or when using our website during registration for loyalty programs. This data may be directly or indirectly related to you. The types of personal data managed by Botaniq Collection include:

1. **Basic personal information:** This includes your name, address, email address, phone number, date of birth, and nationality. This data is necessary for managing bookings and personalizing hotel services.
2. **Identifying information:** Data from your passport or identity card, which may be necessary for check-in to comply with local regulations.
3. **Payment information:** Bank card or credit card details necessary for payment processing.
4. **Travel information:** Information about your bookings, travel preferences, dining habits, and special needs, collected to provide the best possible service.
5. **Communication data:** Details of your communication with us, including customer service inquiries, comments, and feedback.
6. **Technical data:** Data collected during the use of our website, such as IP addresses, login details, browser type and version, time zone and location, and other technological information about the devices used to access our websites.

7. Usage data: Information about how you use our website, products, and services, including interactions with our website.

In limited cases, we may also collect:

1. Data about family members, companions, or children's names and ages.
2. Images and videos captured through security cameras in hotels, restaurants, and clubs.
3. Images and video material prepared for our social media platforms to support Botaniq Collection communication and promotion efforts.

Botaniq Collection is committed to providing personalized and memorable experiences for guests participating in the loyalty program. To achieve this, it is important for us to understand the preferences and habits of our guests, which help us make their stay even more comfortable and enjoyable. In this spirit, the following types of data may be collected and processed during your stay:

Stay preferences: This may include your preferred room type, special requests regarding room location (e.g., floor preferences), and any other specifications that enhance your comfort during your stay.

Personal preferences: These include dietary preferences, allergies, or food intolerances, as well as any other information that may be necessary to personalize hotel and restaurant services. Additionally, we may collect data about your preferred leisure activities, room services, or any other services offered by our hotel.

This data enables us to prepare for your arrival in advance and pay attention to every detail during your stay. Understanding and considering your preferences allows us to surprise you with personalized offers, services, and experiences.

We respect your privacy and ensure that this information is used solely for improving and personalizing our services, always with your prior consent. You can modify or withdraw your preferences at any time by contacting us.

It is possible that during your use of our website, we also collect data that cannot directly identify you. If such data can still reveal your identity or be linked to an individual, we treat it as personal data. Collecting this data helps us improve the functioning of our website and mobile applications and provide more personalized services to you. Below, we inform you about the types of data collected and their use:

System data: Information about the operating system, device type, browser type and version used by you. This data helps us optimize the performance of our website and mobile applications on your device.

IP address: We record the Internet Protocol (IP) address of your device, which allows us to understand where visitors are accessing our website or mobile applications from. IP addresses can be analyzed to measure the traffic to our website and better understand your areas of interest.

Location-based data: If you allow location sharing, we may collect location-based information to help us improve our services and provide personalized offers based on your location.

Cookies and similar technologies: Our website and mobile applications may use cookies and similar tracking technologies (e.g., web beacons, pixel tags) to understand your preferences and improve the user experience. These technologies help us track navigation on our website, remember your settings, and generally improve the usability of the website.

II. **What is a cookie?**

Cookies are small data files stored on the visitor's computer or mobile device by the website. This information can help the website remember the visitor's previous activities and settings, so they do not have to be re-entered on each visit.

How do we use cookies?

1. **Necessary cookies:** These are essential for the basic functioning of the website. For example, these cookies enable secure login or use of the shopping cart function.
2. **Performance and analysis cookies:** These help us understand how visitors use our website, such as which pages are most popular, allowing us to improve the performance of our website.
3. **Functional cookies:** These allow the website to remember your chosen settings (such as username, language, or location) and offer more advanced, personalized features.
4. **Targeted or advertising cookies:** These cookies are provided by third parties and help us display relevant advertisements to you on other websites.

How can you manage cookies? Most browsers accept cookies by default, but you can usually modify your browser settings to reject new cookies, delete existing ones, or receive notification when new cookies are placed on your device. Please note that if you reject or delete cookies, certain parts of our website may not function properly.

We assure you that this data is used solely to improve your user experience with our services, and our data protection practices comply with applicable data protection laws and regulations.

III. **How and where do we collect your data:**

We collect personal data and other data from other companies within the Botaniq Collection for the purposes described in this Privacy Policy, such as providing and customizing services, communicating with you, promoting loyalty programs, and achieving our business goals.

1. We collect personal data and other data from the owners of properties branded as Botaniq Collection, buyers of properties branded as Botaniq Collection that are independently owned and operated.
2. We may collect your personal data and other data from spa services, restaurants, clubs, and travel intermediaries.
3. We collect personal data and other data from third parties who may provide promotions, such as contests, competitions, or other offers.
4. We collect personal data and other data from various third parties, such as public databases, joint marketing partners, and online travel agencies.
5. We collect personal or other data when you interact with our online services, including but not limited to browsing, booking, purchasing goods and services from our websites or applications, communicating with us, posting on social media, or subscribing to a newsletter or participating in a survey, contest, or promotional offer.
6. We collect personal data when you book by phone, email, fax, or through online chat services, or when you contact customer service. We may record these communications for quality assurance and training purposes.
7. We collect personal and other data from devices connected to the internet in our properties. For example, when you connect a device to the hotel's internet or when a smart home assistant is available to personalize your accommodation and experience.

IV. **Why do we collect your data (legal bases):**

THE PURPOSE	DESCRIPTION OF RELATED ACTIVITIES TO THE OBJECTIVE	LEGAL BASES
<p>Reservation and guest registration</p>	<p>Numerous activities are associated with this goal, such as: facilitating the reservation of bookings and hotel accommodations and related services; participating in pre-arrival communication (logistics, changes, preferences, etc.); as well as processing payments and security deposits.</p>	<p>Fulfilling the contract made with the guest who booked the room on behalf of the individual.</p>
		<p>The legitimate interest of the person booking the room, such as respecting their preferences, as well as the legitimate interests of the individuals accompanying the primary guest (e.g., spouse, children, friends).</p>
		<p>Legal obligations related to financial transactions, such as accounting and record-keeping obligations.</p>
<p>Hotel reception and on-site services</p>	<p>Our goal is to provide all necessary comfort and support to our guests during their stay. To this end, we offer the following services and activities:</p> <ul style="list-style-type: none"> - Simplification of the check-in and check-out process. - Smooth handling of financial transactions. - Providing personalized advice and support related to on-site services, based on the guest's previous usage or expressed preferences. - Offering concierge services, luggage storage, and parking. - Facilitating agreements with third parties on behalf of guests, such as simplifying city tours, taxi and transfer services, and restaurant and event bookings. - Ensuring access to Wi-Fi, television, and other connectivity options, as well as entertainment electronics, such as game consoles and hi-fi systems. - Facilitating in-room dining, taking into account the guest's special 	<p>Contract performance, such as processing payments.</p>
		<p>Legitimate interests, such as respecting the guest's preferences (e.g., a room near an elevator or on the top floor).</p>
		<p>Consent, such as collecting information on the guest's dietary preferences provided by the guest.</p>
		<p>Legal obligations, such as collecting national identification numbers when required by law.</p>

	<p> dietary or health requirements. - Housekeeping and dry-cleaning services that consider the guest's unique needs, such as various types of pillows and duvets. - Efficient handling of guests' requests, comments, and complaints, including automated chat services where guests can request additional information or ask questions. - Determining eligibility for age-restricted products and services, such as alcoholic beverages or adult content. Through these activities, we strive to ensure that our guests enjoy a carefree and personalized experience at our hotel chain. </p>	
<p>Conferences and events</p>	<p> Numerous activities are associated with this goal, such as: communication with clients about the planning of conferences and other events ("Events"); facilitating the booking and reservation of Events; participating in pre-event communication (logistics, accommodation, changes, etc.); preparing and coordinating Events in accordance with client instructions, expectations, and preferences; facilitating hospitality; communication related to invoicing and debt collection; processing payments and securities; conducting credit checks; handling customer requests, inquiries, and complaints; and communication with participants during events. </p>	<p>Contract performance, such as collecting information about a planned Event.</p>
		<p>Legitimate interests, such as responding to customer complaints or concerns related to the Event.</p>
		<p>Legal obligations related to financial transactions, such as accounting and record-keeping obligations.</p>
<p>Botaniq Collection operations and business activities</p>	<p> Numerous activities are related to this goal, including: administering customer service to facilitate and manage inquiries, comments, and complaints regarding any of our services (for example, in person, via telephone, email, or social media); managing security and fraud </p>	<p>Contract performance, such as ensuring that online services operate so individuals can make reservations or manage loyalty accounts.</p>

	<p>prevention; administering online services (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and data storage); monitoring and analyzing the use of services, and using data analysis to improve services, marketing, programs, the overall customer experience, collecting feedback, conducting pilot programs for potential new services, and developing new services and enhancing existing ones (including the analysis of information provided automatically through chat functions); and facilitating mergers, acquisitions, and other reorganizations and restructuring of our business (including prospective transactions).</p>	<p>Legitimate interests, such as responding to customer complaints and concerns, which may include recording customer service calls if permitted by relevant laws.</p>
		<p>Consent, such as for marketing programs.</p>
		<p>Legal obligations related to financial transactions, such as accounting and record-keeping obligations.</p>
<p>Emergency and event response</p>	<p>Numerous activities are associated with this goal, such as: ensuring the security of on-site services; responding to, managing, and documenting on-site accidents, as well as medical and other emergencies (including facilitating primary medical services); actively monitoring properties to appropriately prevent, respond to, and document incidents (including the use of CCTV); seeking assistance from emergency services; and sending notifications and alerts in case of incidents or emergencies (for</p>	<p>Contract performance, such as ensuring the safety of guests and staff through interaction with on-site security personnel.</p>
		<p>Legitimate interests, such as monitoring properties through CCTV for the safety of guests and staff.</p>
		<p>Legal obligations, such as documenting on-site accidents.</p>

	<p>example, via SMS, email, calls, audiovisual equipment, etc.).</p>	<p>The vital interests of individuals, such as contacting medical or emergency services in the case of a guest's illness.</p>
<p>Compliance with regulations</p>	<p>Many activities are related to this goal, such as: compliance with relevant laws and regulations; adherence to legal procedures; responding to requests from state and governmental authorities; meeting national security or law enforcement requirements; enforcing our terms and conditions; protecting our operations; safeguarding the rights, privacy, security, or property of Botaniq Collection, guests, visitors, and other affected individuals; and enabling us to avail ourselves of available remedies and limit damages suffered by Botaniq Collection.</p>	<p>Legal obligations, such as compliance with legal proceedings.</p>
		<p>Legitimate interests, such as enforcing terms and conditions for the protection of trademarks.</p>
		<p>The vital interests of individuals, such as contacting emergency services in case of incidents and events affecting guests.</p>
<p>Spa, beauty, golf, and fitness services</p>	<p>Numerous activities are associated with this goal, such as: compliance with relevant laws; adherence to legal proceedings; responding to requests from state and governmental authorities; fulfilling national security or law enforcement requirements; enforcing our terms; protecting our operations; protecting the rights, privacy, security, or property of the Botaniq Collection, guests, visitors, and other affected individuals; and enabling us to avail of available remedies and limit damages sustained by the Botaniq Collection.</p>	<p>Contract performance, such as processing payments.</p>
		<p>Consent, such as collecting information related to back problems for providing massage services.</p>
		<p>Legitimate interests, such as providing personalized services (e.g., offering golfing opportunities based on past activity).</p>
		<p>Legal obligations related to financial transactions, such as accounting and record-keeping obligations.</p>

		The vital interests of individuals (e.g., if an individual falls ill while using the fitness equipment).
Food and Beverage services	Numerous activities are associated with this goal, such as: facilitating reservations; respecting dietary preferences; providing consistent and personalized service based on past usage and the individual's expressed preferences; processing payments; organizing bookings; and handling clients' requests, inquiries, and complaints.	Contract performance, such as processing payments.
		Consent, such as collecting information regarding guests' dietary, health restrictions, or personal preferences when placing food orders.
		Legitimate interests, such as providing personalized services (e.g., offering red wine to guests based on previous requests).
		Legal obligations related to financial transactions, such as accounting and record-keeping obligations.
		The vital interests of individuals (e.g., if an individual falls ill at one of the restaurants).
Services related to children (for parents and legal guardians)	Numerous activities are associated with this goal, such as: assistance with babysitter/hotel nanny, children's club, and junior golf program services; facilitating bookings and reservations; preparing and coordinating hotel accommodations and services according to guests' preferences, instructions, and expectations; payment and billing services; dining services (such as special menus for children or special breakfast discounts for children below a certain age).	Contract performance, such as staying in a room with parents of a certain age may incur additional costs or discounts.
		Parent or legal guardian consent, such as meeting the needs of children.
		Legitimate interests, such as providing cribs or child-sized bathrobes and other comfort services for children.
		Legitimate interests, such as providing cribs or child-sized bathrobes and other comfort services for children.

		The vital interests of individuals, such as when a child falls ill while participating in the kids' club.
Loyalty programs, billing, and relationship management	Numerous activities are associated with this goal, such as: registering users in our loyalty program and determining eligibility for various programs and related services; administering loyalty programs; providing consistent and personalized service based on past usage and members' preferences; ensuring access to online services; processing payments; notifying members of changes to programs, terms, and conditions; and handling members' requests, inquiries, and complaints.	Contract performance, such as evaluating points and allocating benefits.
		Consent, such as adhering to communication preferences (e.g., email, SMS).
		Legitimate interests, such as managing members' decisions on how they want to earn, track, and redeem points.
		Legal obligations related to financial transactions, such as accounting and record-keeping requirements.
Marketing, promotions, and competitions	Numerous activities are associated with this goal, such as: communicating about services that may be of interest to guests; providing personalized advertisements for products and services on selected websites; facilitating participation in sweepstakes, contests, and other promotions (for example, the best vacation photo contests on social media); and handling customer requests, inquiries, and complaints.	Contract performance, such as fulfilling obligations related to competitions.
		Consent, such as adhering to communication methods (e.g., email, SMS).
		Legal obligations, such as handling information in compliance with the rules of the competition.

V. How, when, and with whom we share your data:

Our goal is to provide the highest level of service to our guests, which is why we share your data through the connections described below. Protecting your privacy is of utmost importance to us, and we take all necessary measures to keep your data safe. Your data is processed and stored within contractual frameworks and in accordance with applicable laws at all times.

1. We disclose personal data and other data to the data processing partners of the Botaniq Collection for the purposes described in this Privacy Statement, such as providing and customizing the Services, communicating with you, promoting loyalty programs, and

achieving our business goals. To fulfill and complete reservations, we share your personal data and other data used for reservations with the respective hotel, restaurant, or club.

2. We transfer personal data and other data to the operators of properties branded under the Botaniq Collection for the purposes described in this privacy notice. Operators have limited rights to use certain personal data for their own purposes, so they are considered independent data controllers in the following processing: Operators manage and coordinate your stay at the hotels they operate, using your personal data for this purpose. Operators may also use your personal data to fulfill their own legal obligations, including accounting and record-keeping, as well as other legal obligations.

We share your personal data in the following cases, even without your consent, as required by applicable laws:

1. To ensure compliance with relevant laws and international regulations.
2. To comply with legally required procedures, such as court orders or official requests.
3. Responding to requests from state and governmental authorities, fulfilling national security and crime prevention obligations, including the demands of international authorities.
4. Enforcing our contractual obligations.
5. Protecting our company's business operations, assets, or parts thereof, such as reorganization, merger, sale, association, or other similar transactions.
6. In the interest of protecting the rights, privacy, security, or property of the Botaniq Collection, you, or other individuals.
7. Applying legal remedies or limiting compensation claims in case of harm to us.

We may use and share other types of information, which are not considered personal data, for any purpose, unless expressly prohibited by applicable laws.

VI. Data retention period:

We only store your personal data for as long as necessary to fulfill the purposes set out in the Privacy Statement or as long as permitted or required by law or regulation.

- We determine the retention period of your personal data based on the following criteria:
- During our relationship, as long as you actively use our services or have an account with us.
- If there is a legal obligation for retention, such as laws requiring us to retain your data for a certain period.
- If necessary for the protection of our legal position or the enforcement of legal claims, such as during the statute of limitations, legal proceedings, or regulatory investigations.

Furthermore, it is important that:

- We ensure that your personal data is securely stored and protected from unauthorized access, loss, or destruction.
- Our retention policy is regularly reviewed to ensure compliance with relevant laws.
- We anonymize or delete your data when it is no longer needed for the specified purposes, and there is no legal obstacle to deletion.

VII. Your rights under the General Data Protection Regulation (GDPR):

Under the GDPR, as the data subject, you have, among other rights, the following:

Right to information: You are entitled to receive clear, transparent, and easily understandable information about how we use and handle your personal data.

Right of access: You have the right to know whether we process your personal data and, if so, to access this data.

Right to rectification: You are entitled to request the correction of inaccurate personal data and to supplement it.

Right to erasure (right to be forgotten): In certain cases, you have the right to request the deletion of your personal data.

Right to restriction of processing: You have the right to request restriction of the processing of your personal data.

Right to data portability: You have the right to receive a copy of your personal data in a structured, machine-readable format and to transmit it to another data controller.

Right to object: You have the right to object to certain types of processing of your personal data, especially for direct marketing purposes.

Automated decision-making, including profiling: You have the right not to be subject to a decision based solely on automated processing – including profiling – that has legal effects on you or similarly significant consequences.

Please contact our data protection officer if you would like further information about your rights or if you wish to exercise them. We assure you that the Botaniq Collection hotel chain fully respects these rights and makes every effort to ensure that our data protection practices comply with GDPR requirements.

Data protection officer: Réka Horváth horvath.reka@bhmzrt.hu 1026 Budapest, Pasaréti út 122-124.

VIII. Security

We take all reasonable measures to keep your personal data secure, including appropriate organizational, technological, and administrative safeguards. However, it is important to note that data transmission or storage can never be 100% secure. Please take all possible precautions to protect your own data, including the following:

- Do not share your password with anyone.
- Use strong, unique passwords that you change regularly.
- Avoid using insecure networks when providing or handling personal information.
- Be cautious of phishing attacks and do not click on suspicious links or attachments.
- Ensure that you only share your personal data through reliable and secure platforms.

If you have any doubts about the security of communicating with us, or if you feel that the security of your personal account is in any way threatened, please do not hesitate to notify us immediately using the following contact information. We assure you that we will promptly and effectively address any security issues to protect your personal data.

IX. Data controllers

The Botaniq Collection is under the direction of BDPST Hotel Management Zrt. and acts as an independent data controller regarding the owners and operators of participating hotels, restaurants, and clubs, who have limited rights to use the data collected by the Botaniq Collection as follows:

Since the hotel in which you make a reservation may not be owned by the Botaniq Collection, we provide the Data to the owners or operators of properties branded under the Botaniq Collection for the purposes described in this privacy notice. Owners and/or operators have limited rights to use certain personal data for their own purposes, so they are considered independent data controllers to fulfill their legal obligations, including accounting and record-keeping, and other compliance obligations, managing and coordinating your stays at the hotels they operate.

Contact details of BDPST Hotel Management Zrt.: 1026 Budapest, Pasaréti út 122-124.
info@bhmzrt.hu For any questions related to data protection or exercising your rights, please contact our data protection officer.

X. **Where to seek redress**

First, please contact us with confidence, and we will do our best to solve your problem! If this is not successful or you do not want to do this, you can contact the data protection authority or file a lawsuit in court. Contact details of the Hungarian data protection supervisory authority:

National Authority for Data Protection and Freedom of Information Postal address: 1530 Budapest, Pf.: 5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c

Phone: +36 (1) 391-1400

Fax: +36 (1) 391-1410

Email: ugyfelszolgalat@naih.hu

Website: <https://naih.hu>

Coordinates: N 47°30'56"; E 18°59'57"

Right to appeal to the court: In case of violation of your rights, you can also go to court against the data controller. The lawsuit can be filed before the court having jurisdiction over your place of residence or habitual residence, at your choice.