

PRIVACY STATEMENT CENTRAL EUROPEAN UNIVERSITY - GUESTHOUSE-

At **Raoul Wallenberg Guesthouse** (address: Budapest, 1015 Toldy Ferenc utca 8-10, Hungary) (hereinafter: Guesthouse) we place great emphasis on the protection of your personal information and compliance with the EU General Data Protection Regulation (GDPR)¹. This Privacy Notice relates to the collection, use, transfer, and retention of your personal data processed by the Guesthouse.

The Guesthouse is a residence house operated by CEU Oktatási-Szolgáltató Nonprofit Kft. (hereinafter Okt. Szolg. Kft., seat: 1051 Budapest, Nádor utca 9.). The Guesthouse provides housing and event facilities for guests and partners of the Guesthouse, including but not limited to Central European University and Central European Foundation of Budapest.

In order to provide services and to comply with our legal obligations, the Guesthouse maintains and processes personal data collected during the course of our relationship with guests and partners. The information we hold is obtained directly from you. We may also collect personal information from other external third parties, when the reservation is made by a business partner on your behalf.

We always aim to keep your details up to date and secure.

1 CONTACT DETAILS OF THE DATA CONTROLLER

CEU Oktatási-Szolgáltató Nonprofit Kft.
1051 Budapest
Nádor utca 9.
Phone: + 36 1 327 3000
E-mail: privacy@ceu.edu

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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.

2 DATA PROCESSING ACTIVITIES					
#	Data Processing Activity	Category of personal data	Legal basis	Retention period	Transfer
2.1	Communication with anybody who is contacting the Guesthouse (e.g. future guests, guests, vendors, contact persons)	Name, contact details (email address, telephone number)	Legitimate Interest 6 (1) (f) GDPR	Deletion on request - subject to periodic reviews	-
2.2	Reservation	First name, last name, birth date, Identity Number, Document Type, ZIP Code, Country, City, Address, Nationality, Birth Place, Gender arrival, departure date	Performance of a contract 6 (1) (b) GDPR	For 8 years after the agreement/contract expired	National Tourist Dataservice or Dataprovider Center via TMRW Software (which is used for reservation beside xls. sheet)

2 DATA PROCESSING ACTIVITIES					
#	Data Processing Activity	Category of personal data	Legal basis	Retention period	Transfer
2.3	Check-in (Scanning Documents for Short-Term Visitors <30days)	first name and family name, first name and family name at birth, place of birth, date of birth, sex of the guest, citizenship, mother's first name and family name at birth (if it is on the identification document), identification data on identity card or travel document, for third-country nationals number of visa or residence permit, and date and place of entry into Hungary, including children and relatives which will be staying in the apartment.	Legal Obligation 6 (1) (c) GDPR: Section 9/H of the Act CLVI of 2016 on State Duties Pertaining to the Development of Tourism Regions; Section 7, Section 14 and Section 14/C of the Government Decree No 235/2019 (X. 15.) on the implementation of the Act on State Duties Pertaining to the Development of Tourism Regions.	Last day of subsequent year following data collection (eg. Data collected 1 st March 2024→31 st December 2025)	Data from Scanning in TMRW Software and will be sent to the Closed Guest Information Database (VIZA in Hungarian)

2 DATA PROCESSING ACTIVITIES					
#	Data Processing Activity	Category of personal data	Legal basis	Retention period	Transfer
2.4	Apartment Lease Contract (For Long-Term Visitors)	First Name, Last Name, Address, Place and Date of Birth, Mother's Maiden Name, Passport Number, E-Mail-Address, Phone-Number, Apartment number in the Guesthouse and room (size), Length of Stay, Sponsor (if there is any), Sum (Price), Tax Number of Companies/Institution, Children First Name, Last Name.	Performance of a contract 6 (1) (b) GDPR	For 8 years after the agreement/contract expired	
2.5	Frame Contracts with Embassies and CEU – they accommodate their employees with their families	Contact Persons: First Name, Last Name, Phone Number, E-mail Address, entitled to make Legal Statements: First Name, Last Name	Performance of a contract 6 (1) (b) GDPR	For 8 years after the agreement/contract expired	
2.6	Garage Usage Agreement (who is parking for how long at what price)	First name, last name, id card number, billing address, tax number, License Plate Number, length, Signature	Performance of a contract 6 (1) (b) GDPR	For 8 years after the agreement/contract expired	
2.7	Statement on loss of entry card	Name, signature, date, declaration	Legitimate Interest 6 (1) (f) GDPR	For 8 years after the lost entry card has been paid	
2.8	Issue of an invoice (rent, garage, phone, accommodation, utility, lost/damaged items, printing, extra bed)	First Name, Last Name, Billing Address, Sum, Length, Method of Payment, Type of payment, tax number (optional)	Compliance with a legal obligation 6 (1) (c) GDPR: 169(2) Accounting Act	For 8 years after the issue of an invoice	Authorities on request (e.g. National Tax Office, Local Government, Hungarian Central Statistical Office)

2 DATA PROCESSING ACTIVITIES					
#	Data Processing Activity	Category of personal data	Legal basis	Retention period	Transfer
2.9	Telephone invoice (usage of landline phone)	First Name, Last Name, Billing Address, Sum (price), Length of the calls, dialed numbers, Method of Payment, Type of payment	Compliance with a legal obligation 6 (1) (c) GDPR: 169(2) Accounting Act	For 8 years after the issue of an invoice	Authorities on request (National Tax Office)
2.10	Name on doorbell	First Letter of First Name and Surname	Legitimate Interest 6 (1) (f) GDPR	After check-out	-
2.11	Name on mailbox and garage (if needed)	First Letter of First Name and Surname	Legitimate Interest 6 (1) (f) GDPR	After check-out	-
2.12	Confirmation of Accommodation (one page statement in which we confirm of a certain person living in the GH for how long)	First Name, Last Name, Birthplace, Birth Date, Citizenship, Passport Number, Length of Stay	Compliance with a legal obligation 6 (1) (c) GDPR: Act II of 2007 on the Entry and Stay of Third-Country Nationals Act I of 2007 on the Admission and Residence of Persons with the Right of Free Movement and Residence	Immediately Deletion	-

2 DATA PROCESSING ACTIVITIES					
#	Data Processing Activity	Category of personal data	Legal basis	Retention period	Transfer
2.13	Questionnaire, guests can make recommendations how to improve our service, they give feedback on their stay, they indicate if something is out of order in the apartment and should be fixed or installed	Opinion, remarks, apartment Number, date, name/signature (optional)	Consent 6 (1) (a) GDPR	1year End of Year	-
2.14	Individual File (e.g. how many keys they get, who took out medication from the first aid box and when and what) (Statement on Receipt of Entry Card and Sauna Use, Giving out Keys to the Apartments, garden gate, garage door, Doorbell, security code, Access to First Aid Box)	First Name, Last Name, Address, Birthplace, Birth Date, Mother's Maiden Name, Passport Number, Signature, Security Code Number to the Security Alarm, Number of the Apartment, Signature, Date, Name and Number (amount, number of pills) of the Medication	Legitimate interests pursued 6 (1) (f) GDPR	Deletion after returning the keys	-
2.15	Cashier Receipt (issued manually, when somebody pays in cash)	First name, Last Name, Signature (invoice number, amount to be paid, date)	Compliance with a legal obligation 6 (1) (c) GDPR: 169(2) Accounting Act	For 8 years after the issue of an invoice	-

Person concerned under the age of 14:

If the person concerned has not yet reached the age of 14, any of his/her legal representatives (parents) can give his/her consent to the processing of his/her personal data, so the statement that contributes to the processing of the data of the person concerned **shall be signed by the legal representative.**

For statistical purposes, your data will be anonymized and transferred to the National Tourism Data Supply Centre operated by Hungarian Tourism Agency and to the Hungarian Statistical

Office. We have put in place suitable data protection procedures to safeguard your information in line with the applicable data protection laws.

3 WHO RECEIVES YOUR INFORMATION?

Unless we have a legal obligation to do so, we will not disclose your data to individuals, organizations, or other entities outside the Guesthouse.

For the purposes set out in section 2, we may need to pass your information to our third-party service providers, agents, subcontractors, Guesthouse's related organizations for the purposes of completing tasks and providing services to you on our behalf. However, with all external entities with whom data is shared, we share only those data needed to perform the specific service and require a contract and/or confidentiality and non-disclosure agreement to be signed before any data transfer—requiring them to keep your information secure and not to use it for their own purposes. We will not sell or rent your information to third parties.

Specific third parties we work with include:

- **Microsoft 365:** based in the US, with CEU's data stored within EU in datacenters located in Amsterdam and Dublin. Software as A Service which provides CEU's email and document management.
- **In-Kal Zrt:** based in Hungary, the company provides security services. <http://www.in-kalzrt.hu/>
- **Compargo.hu:** based in Hungary, telephone software.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

4 WHAT ARE YOUR RIGHTS?

- **Access** your personal information – you can obtain a confirmation that we are processing your data and information how we process it. We suggest that you make a request in writing.
- **Object** to the processing of your personal information – this allows you to ask us to stop processing your data at any time. Where we rely on legitimate interest, you must give specific reasons why you are objecting the processing of your data. In this case this is not an absolute right, we can demonstrate compelling legitimate grounds for processing, which override your interests, rights, and freedoms. Where we are processing personal data for scientific or historical research, or statistical purposes, you only have a right to object if our lawful basis for processing is legitimate interest.
- **Rectify** – you have a right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed.

- **Erase** (also known as the right to be forgotten) – in certain circumstances you can ask for the data we hold about you to be erased from our records. Your personal data will be erased where the data are no longer needed for their original processing purpose, or you have withdrawn your consent and there is no other legal ground for processing, or you have objected and there are no overriding legitimate grounds for the processing, or erasure is required to fulfill a statutory obligation under the EU law or the right of the national law.
- Request **data portability** – you can ask to have the data we hold about you transferred to another organization.
- **Restrict processing** your personal information – where certain conditions apply you have a right to restrict the processing of your personal information.
- **Withdraw consent** at any time – without affecting the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of these rights, please email privacy@ceu.edu or write to us at Quellenstraße 51, 1100 Vienna.

We will make every effort to fulfill your request to the extent allowed by law and will respond within 1 month of receiving your request.

You also have the right to lodge a complaint with the relevant national authority, the contact details are as follows:

HUN

Hungarian Data Protection Authority
Falk Miksa utca 9-11
1055 Budapest, HUNGARY
Phone: +36 (30) 683-5969
E-Mail: ugyfelszolgalat@naih.hu
Web: <https://naih.hu/>

In addition to the legal remedy, you have the right to apply to the court against the activities of the Joint Data Controllers.

5 SECURITY OF YOUR INFORMATION

We are committed to holding your data securely and treating it confidential. All data are held securely and in accordance with the relevant data privacy laws and our internal policies. We do not sell to or trade your data with any other organizations.

6 FUTURE CHANGES

If our information policies or practices change at some time in the future, we will post the changes on Privacy [Website](#).

Last updated on: May, 2025