

Privacy Notice — All Access Budapest

Informative English translation of adatkezelesi-tajekoztato-hu.md. The Hungarian version governs.

Version: 1.0 · In force from: 9 October 2026 · Published at: allaccessbudapest.hu/adatkezeles

Scope: this notice applies to everyone using allaccessbudapest.hu, budapesthungary.info, allaccessmap.com or admin.allaccessbudapest.hu, whether as a guest, a property-owning Host or a business partner.

1. Controller

Item	Value
Company	Ikram Invest Kft.
Registered seat	1188 Budapest, Határ utca 16.
Company registration no.	01-09-428154
Tax number	32514502-2-43
Representative	Richárd Márki
Privacy contact	privacy@allaccessbudapest.hu
General contact	info@allaccessbudapest.hu

Prepared under Regulation (EU) 2016/679 (GDPR) and Hungarian Act CXII of 2011 (Infotv.).

2. Who this covers

Guests (guest pages and the map, no registration); Hosts (property operators in the program, also bound by the terms of service); business partners' contact persons; and poster/plaque customers.

3. Guests

What we record. No registration; we ask for no name, email or phone. We record a random session ID (created in the browser, deleted when the tab closes, not linked to a person), which apartment page or QR code was opened, the chosen language, and which offer or external site was clicked and when. No Google Analytics, Meta Pixel or similar third-party tracking.

Legal basis: legitimate interest (GDPR Art. 6(1)(f)) in measuring and improving the service and settling with Hosts.

Cookies: no marketing or analytics cookies. The session ID sits in the browser's temporary sessionStorage. The partner portal uses one strictly necessary login session cookie, which needs no consent.

Retention: event-level data for up to 13 months, then deleted or kept only as aggregated, anonymous statistics.

External sites: clicking an offer (e.g. GetYourGuide, Tiqets) takes the guest to that provider; we pass them no personal data, and the provider's own privacy notice applies from there.

4. Hosts

Data	Purpose
Contact name, email, phone	Communication, portal login.
Organisation or host name	Identifying the contracting party.
Apartment name, district, exact address	Building the guest page and choosing nearby recommendations. The exact address is never shown publicly.
Terms acceptance data: version, time, email, authority declaration, browser identifier	Proof of contract.
Payout declaration: individual or business, tax status	Determining how to pay.
Individuals: name, tax ID, social security (TAJ) number, address, bank account	Paying the commission share; mandatory tax and contribution returns.
Businesses: company name, tax number, seat, bank account, invoices	Paying the commission share; bookkeeping.
Commission statements, payouts	Settlement, bookkeeping.

Legal bases: contract (Art. 6(1)(b)) for running the program, guest page, portal and commission share; legal obligation (Art. 6(1)(c)) for tax ID, TAJ and payout data under payer tax/contribution and accounting retention duties; legitimate interest (Art. 6(1)(f)) for keeping acceptance records as proof.

Retention: account and contract data for 5 years after the contract ends; payout data, invoices and accounting records for 8 years, even if the account is closed.

5. Business partners' contacts

Name, email and joint settlement data, under the contract (Art. 6(1)(b)), for 5 years after the contract ends; accounting records for 8 years.

6. Poster customers

Orders currently go by email. Name, email, delivery address and order data under the contract (Art. 6(1)(b)); invoices kept for 8 years. We never handle card data.

7. Who can access the data

Processors (acting on our behalf under contract):

Provider	Task	Transfer
Neon (part of Databricks)	Database service	US company; transfers rely on the EU–US Data Privacy Framework and/or the European Commission's standard contractual clauses.
Resend	System and notification emails	US; certified under the EU–US Data Privacy Framework.
Vercel Inc.	Running the websites	[TO BE FILLED]
Accountant	Bookkeeping, payroll, tax returns	Hungary

Recipients by law: the Hungarian tax authority (NAV) for mandatory returns on payouts; the paying bank; authorities and courts where the law requires.

Statistics, analysis and development. We do not sell personal data and do not let others use it for their own purposes. To analyse and develop the service and produce statistics, we may share data with third-party tools and persons (e.g. analytics software, developers, advisers). We share aggregated or anonymous data wherever possible; where personal data is involved, only under a processing agreement and confidentiality, used solely on our instructions and for our purposes. The legal basis is our legitimate interest (Art. 6(1)(f)), to which anyone may object (section 9).

8. Security

HTTPS throughout; the partner portal only for authenticated users, internal admin only for authorised staff; passwords not stored in recoverable form; regular database backups by the provider.

9. Your rights

Access, rectification, erasure (data we must keep by law is kept until the retention period ends), restriction, objection to processing based on legitimate interest, and data portability for contract-based processing. You may complain to the Hungarian data protection authority (NAIH, 1055 Budapest, Falk Miksa utca 9–11., ugyfelszolgalat@naih.hu, www.naih.hu) or go to court. Send requests to privacy@allaccessbudapest.hu; we reply within one month.

10. Changes

We may amend this notice. The version published at allaccessbudapest.hu/adatkezeles always governs; Hosts are also emailed about material changes.