

PRIVACY NOTICE***Villa11 website and connected services***

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You are reading the data protection information of the Villa11.hu website and its associated services, operated by Soulsisters Ltd. (hereinafter referred to as the "Data Controller"). Our company enforces uncompromising, strict data protection and information security requirements to ensure the protection of user data (Villa11 membership, guests, visitors) throughout our operations.

1. WHO IS THE DATA CONTROLLER?**Soulsister Kft. is your Data Controller**

Under data protection laws, the Data Controller can be a natural person, legal entity, or an organization without legal personality. The Data Controller essentially determines independently or jointly with others the purpose of data processing, makes decisions regarding data processing (including the means used), and implements these decisions independently or in conjunction with a data processor.

Exact name of the Data Controller:	Soulsisters Kft.
Company registration number:	01-09-422374
Registered office:	1026 Budapest, Torockó utca 11. 1. em 1. ajtó
Email address:	villa@villa11.com
Data Controller's website:	www.villa11.hu
Data Protection Officer:	Kinback Szilvia

2. THE PURPOSE AND LEGAL BASIS OF DATA PROCESSING

For easier comprehension, we have summarized the purposes, legal basis, scope of processed data, and duration of data processing in tabular form below:

Nr.	Purpose of Data Processing	Legal Basis of Data Processing	Scope of Processed Data	Duration of Data Processing
1.	Membership Application Registration (Establishment, Maintenance, Termination of Membership Relationship) ("Membership")	The legal basis for data processing is necessary for the performance of a contract in which the data subject is a party, or for taking steps at the request of the data subject prior to entering into a contract, pursuant to	For natural persons: surname; first name; email address; phone number; nickname; date of birth; gender. For legal entities: company details; contact person's name, email address, phone number; name of the service recipient, see the	We will retain the data for a period of 5 years following the termination of the contract (based on the statute of limitations under the Civil Code), and regarding invoicing, refer to the provisions in point 9.

		Article 6(1)(b) of the GDPR; regarding invoicing, it is necessary for compliance with a legal obligation under Article 6(1)(c) of the GDPR.	information listed for natural persons; registration date.	
2.	Participation in Trial Classes Before Membership Registration ("Trial Classes")	Same as above.	For natural persons: surname; first name; email address; phone number; nickname; date of birth; gender. For legal entities: company details; contact person's name, email address, phone number; name of the service recipient, see the information listed for natural persons; registration date.	We will retain the data for a period of 5 years following the termination of the contract (based on the statute of limitations under the Civil Code), and regarding invoicing, refer to the provisions in point 9.
3.	Participation in Trial Classes Related to Non-Member Registration ("Trial Class") - Same as above.	Same as above.	For natural persons: surname; first name; email address; phone number; nickname; date of birth; gender. For legal entities: company details; contact person's name, email address, phone number; name of the service recipient, see the information listed for natural persons; registration date.	We will retain the data for a period of 5 years following the termination of the contract (based on the statute of limitations under the Civil Code), and regarding invoicing, refer to the provisions in point 9.
4.	Villa11 Massage Registration (service independent of membership)	The legal basis for data processing is explicit consent pursuant to Article 6(1)(a) of the GDPR, as well as Article 9(2)(a).	For natural persons: surname; first name; email address; phone number; nickname; date of birth; gender. For legal entities: company details; contact person's name, email address, phone number; name of the service recipient, see the information listed for natural persons; registration date; declaration (the massage therapist may request further data provision before providing the service and during treatments).	We will retain the data for a period of 5 years following the termination of the contract (based on the statute of limitations under the Civil Code).
5.	Villa11 Body Sculpture Studio - Machine Body Treatment (service independent of membership)	The legal basis for data processing is explicit consent pursuant to Article 6(1)(a) of the GDPR, as well as Article 9(2)(a).	For natural persons: surname; first name; email address; phone number; nickname; date of birth; gender. For legal entities: company details; contact person's name, email address, phone number; name of the service recipient, see the information listed for natural persons; registration date; body treatment form	We will retain the data for a period of 5 years following the termination of the contract (based on the statute of limitations under the Civil Code).

6	Registration for Villa11 Events (e.g., Literary Evening, Home Theater) ("Events")	The legal basis for data processing is your consent pursuant to Article 6(1)(a) of the GDPR.	For natural persons: surname; first name; email address; phone number; nickname; date of birth; gender. For legal entities: company details; contact person's name, email address, phone number; name of the service recipient, see the information listed for natural persons; registration date; food sensitivity; accompanying person.	We will process the provided personal data until the withdrawal of consent, or delete it after 1 year of user inactivity.
7	I Want to Host My Own Event! ("Event")	The legal basis for data processing is your consent pursuant to Article 6(1)(a) of the GDPR.	Information collected: Which room you would like to reserve, name (surname, first name), email address, phone number, date, start time, end time, type of event, message. Data of legal entities.	In the case of legal entities, the provided personal data will be processed until the withdrawal of consent, or in case of the realization of the own event, see the provisions in point 9
8	Newsletter Subscription	The legal basis for data processing is your consent pursuant to Article 6(1)(a) of the GDPR.	Information collected: Full name, email address, subscription date.	We will process the provided personal data until the withdrawal of consent.
9	Initiating Online Payments	The legal basis for data processing is necessary for the performance of a contract in which the data subject is a party, or for taking steps at the request of the data subject prior to entering a contract, according to Article 6(1)(b) of the GDPR. Regarding invoicing, it is necessary for compliance with a legal obligation under Article 6(1)(c) of the GDPR.	Information collected: Full name, booking, redirection to the online payment service provider's page, coupon code for discounts.	We will retain the transaction data for a period of 5 years following the termination of the contract (based on the statute of limitations under the Civil Code), and invoices issued must be retained for 8 years from the date of issuance according to Section 169(2) of the Accounting Act.
10	a) Consumer complaint / consumer protection dispute related to services specified in the Terms and Conditions. b) Other complaints, legal enforcement, appeals, observations.	a) Legal obligation concerning the Data Controller pursuant to Article 6(1)(c) of the GDPR, in accordance with Section 17/A(7) of Act No. CLV of 1997. b) Legitimate interest of the Data Controller pursuant to Article 6(1)(f) of the GDPR.	a) Name (last name and first name), email address, phone number, date of complaint receipt, record, and response. b) Name (last name and first name), email address, phone number, date of complaint/legal inquiry receipt.	a) The Data Controller is obliged to retain the minutes of the complaint and a copy of the response for three years. b) For a period of 5 years following the closure of the case (civil statutory limitation).
11	Customer Satisfaction Survey	The legal basis for data processing is the legitimate interests of the Data Controller	Information collected: Name, email address, comments, date of submission.	We will retain the survey responses for a period of 14 months following the

		under Article 6(1)(f) of the GDPR.		completion of the survey.
12	Registry of Member-Recommended Person Referral Forms (Referral Form)	The legal basis for data processing is the legitimate interests of the data controller pursuant to Article 6(1)(f) of the GDPR.	Information collected: Recommended person's name, occupation, hobbies, interests, reason for recommendation, email address, phone number, date of submission.	We will retain the Referral Form for a period of 6 months following successful contact with the recommended person. In case of unsuccessful contact, we will delete it within 30 days after the second attempt.
13	Registry of emergency contact persons designated by members in case of accidents or other justified emergencies	Pursuant to Article 6(1)(b) of the GDPR for the performance of the Membership Agreement	Name, phone number, email address, nature of relationship (relative/friend, etc.)	Within 14 days following the termination of membership (so-called technological deletion deadline).
14	Receiving Direct Marketing (DM) messages	Your consent pursuant to Article 6(1)(a) of the GDPR	Full name, email address, consent timestamp	We will process the provided personal data until the withdrawal of consent.
15	The creation and utilization of portraits, audio, and video recordings for the promotional display of Villa11's services.	In accordance with Article 6(1)(a) of the GDPR, the consent of the data subject shall be obtained, with regard to Section 2:48 § (1) of the Civil Code.	Portrait, audio recording, video recording (including both portrait and audio).	Within 5 business days following receipt of the deletion request, provided that it is feasible according to the current state of technology and does not incur disproportionate costs.

3. ABOUT DATA PROCESSORS BRIEFLY

A "Data Processor" is the organization or entity that the Data Controller engages to fulfill its obligations regarding personal data. Below, we have summarized the data processors utilized by the Data Controller in tabular form.

No.	How it helps us?	Tool	Contact	Privacy Notice
1	Domain and web hosting	GoDaddy.com	<i>GoDaddy Deutschland GmbH c/o WeWork Friesenplatz 4 50672 Cologne, Germany</i>	https://www.godaddy.com/en-uk/legal/agreements/european-supplemental-privacy-notice
2	Server hosting	Synology NAS	<i>Synology Inc. 9F, No. 1, Yuan Dong Rd., Banqiao Dist., New Taipei City 220632 Taiwan</i>	https://www.synology.com/hu-hu/privacy
3	Email and document storage	Microsoft 365	<i>Microsoft Ireland Operations Limited, Attn: Data Protection Officer, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. Telefonszám: +353 1 706 3117.</i>	https://www.microsoft.com/hu-hu/trust-center/privacy/gdpr-overview

4	Newsletter sending	WIX.com Ltd	40 Namal Tel-Aviv Street, Tel Aviv-Yafo, Israel	https://www.wix.com/about/privacy
5	Invoicing	a) Szamlazz.hu b) Billingo.hu	a) KBOSS.hu Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság (KBOSS.hu Kft.) Székhely: 1031 Budapest, Záhony utca 7. b) Billingo Technologies Zártkörűen Működő Részvénytársaság c) Székhely: 1133 Budapest, Árbóc utca 6. I. emelet	a) https://www.szamlazz.hu/adatvedelem/#a-kboss-hu-kft-mint-adatkezeles-es-adatfeldolgozo-adatai-a-kovetkezo-k b) https://www.billingo.hu/adatkezelesi-tajekoztato
6	Online payment service	Barion	Barion Payment Zrt. Székhely: 1117 Budapest, Irinyi József utca 4-20. 2. emelet. Nyilvántartó cégbíróság: Fővárosi Törvényszék Cégbírósága Cégjegyzékszám: Cg. 01-10-048552	Privacy policy https://www.barion.com/hu/adatvedelmi-tajekoztato/

4. TRANSFER OF DATA TO THIRD COUNTRIES AND PROFILING

The Data Controller only transfers personal data to third countries or international organizations outside the EU and EEA with appropriate safeguards in place. Such safeguards may include the quality of the partner company's data processing information, Standard Contractual Clauses (SCC), or the existence of an adequacy decision. During the provision of services or in connection therewith, the Data Controller does not utilize algorithm-based Artificial Intelligence (AI) or evaluator or profiling programs operating without human intervention.

5. COMPLAINTS AND JUDICIAL REMEDIES

Anyone can initiate an investigation with the National Authority for Data Protection and Freedom of Information (NAIH) by filing a complaint, citing that a breach of personal data processing has occurred or that there is an imminent danger thereof. The contact information for the authority is as follows:

National Authority for Data Protection and Freedom of Information
Headquarters: 1055 Budapest, Falk Miksa utca 9-11.
Mailing address: 1363 Budapest, Pf. 9.
Phone number: +36 (1) 391-1400
Fax number: +36 (1) 391-1410
Central email address: ugyfelszolgalat@naih.hu
Website URL: <http://www.naih.hu>

In case of a violation of your informational self-determination (data subject) rights, you also have the option to bring a lawsuit against the Data Controller. You can find public information about the court that is competent for you [HERE](#).

6. CONSEQUENCES OF FAILURE TO PROCIE DATA AND WITHDRAWAL OF DATA PROVISIONING

The data processing purposes outlined in point 2 of this notice primarily serve to present the data processing aspects of Villa 11's service portfolio. The processing of data indicated in the table is carried out based on consent, performance of a contract, or legal requirements. Please note that providing your personal data is a prerequisite for the provision of our services, as failure to do so will prevent us from providing services to you. It's important for you to know that if the data processing is based on your consent, you can withdraw it at any time; however, this does not affect the lawfulness of processing carried out before withdrawal based on consent or legal obligations (see GDPR Article 13(2)(c)).

7. YOUR RIGHTS (SO-CALLED DATA SUBJECT RIGHTS)

Below is a brief summary of your data subject rights. If you would like detailed information on these, please feel free to contact us!

As a data subject, you have the right to request information about the data processing necessary for Villa11's operations at any time. You may also request the correction or completion of your personal data if you believe that your data has been inaccurately recorded in our system.

If you no longer wish for your data to be processed, you can exercise your right to have it deleted, as you have the right to withdraw your consent to data processing given earlier at any time. It is important to note that the Data Controller cannot delete data that is required by law to be processed or necessary for the exercise of third-party rights (e.g., information used in civil or criminal proceedings). If deemed necessary, you may request the restriction of processing related to you, based on your right to restriction.

You are entitled to receive the personal data provided by the Data Controller in electronically recorded form (right of access), and you may also request that this data be transferred to another data controller. This can be done free of charge once a year.

You also have the right to lodge a complaint and seek judicial remedies, the guidelines for which can be found in point 5 of this notice.

You can send your request regarding the exercise of your data subject rights to the notification address specified in point 1 of this notice. We will investigate and respond to your request within one month. If necessary, with appropriate notification, we may request an additional two months to conduct our investigation.

8. FINAL PROVISIONS

This notice has been prepared in accordance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), repealing Directive 95/46/EC.

Effective from: March 1, 2024

Validity: Until revoked or modified.

Thank you for your kind attention!