

PRIVACY IN BRODYLAND

Privacy is an important element of BrodyLand©. The careful way in which we curate and interact with our community of Brodyites© (ie. people that hold BrodyLand visas or BrodyLand citizens - formerly known as Brody Members) is reflected in how we keep you informed of what's buzzing on the social and cultural front. Most of this activity takes place at BrodyLand's venue called Brody Studios in Budapest. This Privacy Policy is intended to reassure you of our commitment to safeguarding your personal data and ensure you know whom to contact should you have concerns on this front.

How we use and what we do to protect your data?

BrodyLand is committed to protecting and preserving the privacy of all Brodyites and their guests both within the physical venues of which BrodyLand is comprised as well as when communicating electronically anyone within the community whether that be for social and cultural purposes within Brody Studios or for accommodation at any of the BrodyLand venues. This Privacy Policy explains when and why we collect personal information about Brodyites and their/our guests, how we use this information and how we keep it secure. We will keep all of your personal information confidential and securely in accordance with the current and any future applicable Data Protection legislation but reserve the right to disclose this information in the circumstances as set out within this policy and may change this Policy from time to time to comply with the current and future applicable GDPR requirements.

Who are we?

BrodyLand© is a creative hospitality concept that is owned by The Brody House Group of which the holding company is Brody House International Limited (registered office address is 114 The Strand, Gzira 1027, Malta).

How do we collect information from you?

We may request information about you in order to process, grant and renew BrodyLand visas and hence access to the private community and venues that make up BrodyLand. We may also ask you to provide information when, for example, you contact us with an enquiry or reservation, if you directly give us any information via forms including our 'visa' (aka membership) application form, if you make a booking for an event or request to receive email newsletters known as Brody Blurb©, Brody Buzz© or Brody Blah Blah©.

What type of information is collected from you?

In running and operating the BrodyLand hospitality business and its components, The Brody House Group may collect and process certain data and information relating to you and your use of the private venues. The Brody House Group will never collect sensitive data and limits the purview of data collection to your name, email address, postal address and phone number. This information is used to enable BrodyLand to send you the social and cultural information that we are bound to provide to Visa holders and citizens as well as any information pertaining to an accommodation or event booking that you may have made in BrodyLand. We will never release your personal details to any third party for mailing or marketing purposes.

The personal information we collect may be used for the purposes of data analysis or to improve our marketing efforts and ensure you receive the information that you wish to receive about what's going on in BrodyLand. We may also collect information you provide to us by sending us an electronic message through this website (www.brody.land) in order to book a room or pay for your BrodyLand visa or by email in which case, we may keep a record of your email and other correspondence on our Google server to ensure anything you request is processed efficiently and accurately. We may use Google Analytics to analyse the use of our website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information and you can read Google's privacy policy is available to view here: <http://www.google.com/privacypolicy.html>

If you make an online purchase from us, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below. Only if an account facility is requested for food and beverage or if we require a deposit for an event shall we hold payment details and this will be at the clear understanding of the customer with the customer's signature to verify and consent to both the processing of the deposit payment as well as the retention of your information.

How is your information used?

We may use your information to:

- ensure our website is easy to navigate and presented in the most efficient way for your browser and the computer that you are using;
- enable you to participate in interactive features either on our website or electronic messages, for example a reservations link;
- provide you with information relating to the social and cultural offering, our website, events, products or services that you request from us;
- process a booking you have made;
- meet our obligations arising from any visa requests or contracts entered into by you and us;
- notify you about any changes to our communications, website, events, services or products;
- send you communications which you have requested and that may be of interest to you which may include information about visas/membership, social and cultural events, information about BrodyLand and its affiliate clubs around the world, replies to emails and reservation enquiries/confirmations.

IP Addresses

Our website may collect information about your computer, including but not limited to your IP address, operating system and browser type for operational purposes and to produce internal reports. This is statistical data relating to a web user's browsing actions and patterns and does not specifically identify you as an individual.

Who has access to your information?

We will never sell your information to third parties. It is stored on professional contact database management platforms or Google's email servers to which only staffers of Brody House kft have access. We may be required to provide your name and address to our legal and accounting professional advisors for the purpose of complying with accounting and corporate laws in Hungary and elsewhere in Europe. We will not release your information to third parties beyond The Brody House Group unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime or in order to comply with any legal obligation. For the avoidance of doubt, under no circumstance will we share your information to third parties for marketing or promotional purposes.

For any room bookings via third party service providers, we do not typically receive your personal information. In such cases, the personal information you have entered into the relevant accommodation booking system will fall under the responsibility of that organisation's data protection and privacy policy. We only work with established organisations such as Mr and Mrs Smith and Booking.com. You can contact if you have any questions regarding secure transactions. Naturally, if you cannot reach them you are welcome to contact us and we will steer you to the relevant person within the relevant organisation.

How do I opt out?

You have a choice about whether or not you wish to receive information from us. We will not make contact with you unless you are a member, former member, or registered contact that has requested to be informed of BrodyLand, any of its component venues or The Brody House Group social and cultural activities. If you no longer want to receive direct communications from us about these things, you can change your preferences or completely unsubscribe by:

- Clicking 'unsubscribe' at the bottom of BrodyLand Buzz, BrodyLand Blurb or other social and/or cultural content emails we send to you; or
- Email office@brody.land or telephone +36 1 550 7363 and request that your contact details be removed.

Given our eco creds, we do not send hard copy information by post aka snail-mail.

Your rights as a data subject

The accuracy of your information is important to us. If you change email address, phone number or move, please email us at bordercontrol@brody.land or call +36 1 550 7363. You have the following rights that we will observe at all times:

- Right of access - you have the right to request a copy of the information that we hold about you.
- Right of rectification - you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten - in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing - where certain conditions apply you have a right to restrict the processing.
- Right of portability - you have the right to have the data we hold about you transferred to another organisation.
- Right to object - you have the right to object to certain types of processing such as direct marketing.

To access what personal data is held, valid and up-to-date identification will be required.

Use of 'cookies'

Like other websites, our website may use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. Cookies are sometimes used to improve the website experience of a visitor to a website. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we may use cookies to pre-fill some information on forms and to enable us to see what members and guests may view on our website and for how long.

Third party privacy matters

This privacy policy applies only to our website and electronic communications, so we encourage you to read the privacy statements of other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you accessed those using links from our website or email communications. In addition, if you were referred to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third party site.

Minors

We are concerned to protect the privacy of minors under the age of 18 and request all individuals under this age obtain a parent/guardian's permission beforehand providing anyone within BrodyLand with their personal information.

Transferring your information outside of Europe

It is possible that the information you provide to us may be transferred to countries outside the European Union ("EU"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the EU. By submitting your personal data, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Privacy Policy. If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Third Party Processing

We may utilise the services of third party organisations to process your personal data. As the data controller we determine the purpose and means of the processing of your personal data. Where your data is processed by any third party on our behalf that third party is a processor under the GDPR. We confirm that we take steps in order to ensure that this data is processed lawfully under the law in accordance with each agreement that we have in place with each such processor.

Questions or Complaints

Any questions regarding this Privacy Policy, our related processes or complaints about our handling of your personal information should be sent by email to office@brody.land or by writing to Data Protection Officer, % The Brody House Group, Vörösmarty utca 38, 1064 Budapest, Hungary. If you prefer to speak to someone directly, you can call +36 1 550 7363.

We keep this Privacy Policy under regular review. It was last updated in May 2018 with the introduction of the GDPR requirements.