

PERSONAL DATA POLICY

GENERAL TERMS FOR USING AND PROTECTING THE PERSONAL DATA

HOT SPRINGS Medical & Spa Hotel processes your personal data for the purpose of fulfilling the obligations imposed on us by the Tourism Act, as well as for the purpose of providing a high-quality hotel service.

We protect your data by applying all the appropriate technical and organizational ways and means in order to preclude unauthorized access, unauthorized or ill-intentioned use, loss or premature deletion of the information.

HOW AND WHY WE USE YOUR PERSONAL DATA

For fulfilling legislative obligations and contractual obligations.

We collect and process your personal data and other personal data in order to fulfill the obligations imposed on us by the Tourism Act.

We collect and process your personal data and other personal data in order to provide to a full extent the services which you have ordered and which you expect from us, as well as in order to fulfill our contractual obligations to you.

- ✓ PIN, names, sex, citizenship, permanent address;
- ✓ E-mail address, letters, information about your orders for rectification and remedy of problems, appeals, requests, complaints;
- ✓ Other feedback that we receive from you;
- ✓ Video records made for the purpose of improving the security;
- ✓ Preferences in connection with the services we provide;
- ✓ Security upon the inputting and transmission of bank card data is ensured by using SSL protocol for encrypting the connection between our server and the payment page of our servicing bank;
- ✓ The authenticity of your card is verified by inputting a security code (CV2);
- ✓ In addition to this and in order to identify you as the cardholder, the e-commerce payment server of our servicing bank supports the authentication databases of the international card organizations – Verified by VISA and MasterCard SecureCode, in case you are registered to use them.



Other information such as:

- ✓ Data provided through the website of the hotel;
- ✓ IP-address when visiting our website;
- ✓ Demographic data, household information when you give your consent to participate in our surveys, sweepstakes or other feedback provided to us by you in connection with the services used;

The processing of the data is aimed at:

- ✓ verifying the identity of the client upon checking-in into the hotel;
- ✓ management and fulfilment of your orders for services;
- ✓ preparing and sending a bill/an invoice for the services you use;
- ✓ ensuring comprehensive servicing of your needs, as well as collecting the monetary amounts due and payable for the services used;
- ✓ analysing your history as a client and preparing your user profile for the purpose of identifying the offer that is most appropriate for you;
- ✓ researching and analysing the consumption of our services by the clients on the basis of anonymous or personalized information to identify the main trends, to improve our understanding of the behavior of our clients and to collaborate with third parties to develop new services for our clients;
- ✓ processing by a data-processing person upon conclusion of a contract, assignment, reporting, accepting, paying;

AFTER YOUR CONSENT

In some case we process your personal data only after your preliminary written consent. The consent is separate grounds for processing your personal data and the purpose of the processing itself shall be specified in the consent and it coincides with the purposes enumerated in this present policy. If you give us yours consent and pending its revoking:

- ✓ we prepare offerings that are appropriate for you as to the programs and services offered by the hotel;

The consent given can be revoked at any time. The revoking of the consent will be reflected in the services and programs offered.

In order to revoke the consent given, you have to send your application for doing so to the e-mail address of the hotel.

WHOM DO WE PROVIDE YOUR PERSONAL DATA TO:

We process your identification data and other personal data to comply with obligations stipulated in the statutory acts such as:

- ✓ providing information to the Consumer Protection Commission or to the third parties envisaged in the Consumer Protection Act;

- ✓ providing information to the Personal Data Protection Commission in connection with the obligations envisaged in the statutory framework for protection of the personal data – Personal Data Protection Act, Regulation (EU) 2016/679 dated 27 April 2016, etc.;
- ✓ obligations envisaged in the Accountancy Act and in the Tax and Social Security Procedures Code and other related statutory acts in connection with keeping accurate and law-compliant accounting records;
- ✓ providing information to the courts and to third parties within the framework of judicial proceeding in accordance with the requirements of the procedural and statutory acts of corporeal law applicable to the said judicial proceeding;
- ✓ certification and ascertaining of payments made in connection with online registrations;

HOW DO WE PROTECT YOUR PERSONAL DATA

In order to ensure adequate protection of the company's data and of the company's clients' data, we apply all the necessary organizational and technical measures envisaged in the Personal Data Protection Act and the acts of secondary legislation on its application.

For the purpose of achieving maximum security of the processing, transmission and storage of your data, we can use additional protection mechanisms such as encryption, pseudonimization, etc.

WHEN DO WE DELETE YOUR PERSONAL DATA

As a rule, we stop using your personal data for the purposes related to the contractual relationship after termination of the contract but we do not delete the data until the expiration of 1 (one) year from the termination of the contract or until the final settlement of all financial liabilities and expiration of the legislatively-prescribed data storage obligations such as the obligations under the Accountancy Act pertaining to the storage and processing of accounting data (5 years), expiration of the contractual terms of limitation stipulated in the Obligations and Contracts Act pertaining to the lodging of claims (5 years), obligations to provide information to the courts, the competent state authorities and on other grounds envisaged in the applicable legislation (5 years).

Please, bear in mind that we will not delete or anonymize your personal data, if this data is needed for a pending judicial procedure, administrative procedure or procedure for hearing a claim or complaint of yours against us.

Your data can also be anonymized. The process of "anonymization" is an alternative to deleting the data. In the event of an anonymization, all the personal recognizable

components and the components enabling your identification shall be deleted irrevocably. There is no legislative requirements for the anonymized data to be deleted since they are not personal data.

YOUR RIGHTS IN CONNECTION WITH THE PROCESSING OF YOUR PERSONAL DATA

Right to information

You are entitled to request:

- ✓ information on whether the data pertaining to you is processed, information on the purposes of such processing, information on the categories of data involved and on the recipients or categories of recipients to whom the data is disclosed;
- ✓ notification in a comprehensible form containing your personal data which is being processed, as well as any available information on the source of this data;
- ✓ information on the rationale of any automated processing of personal data pertaining to you, at least in the cases of automated solutions.

Right to correction

In case we process incomplete or erroneous/incorrect data, you are entitled to request at any time:

- ✓ that we delete, correct or block your personal data the processing of which is in contravention of the requirements of the law;
- ✓ that we notify the third parties whom the personal data was disclosed to about the deletion, correction or blocking, with the exception of the cases when this is impossible or is associated with excessive efforts.

Right to deletion /right “to be forgotten”

You are entitled to request at any time that the personal data processed by us be deleted, if:

- ✓ the personal data is not needed for the purposes for which it was collected and processed;
- ✓ you withdraw your consent and there are no other legal grounds for processing the data;
- ✓ your personal data was processed in violation of the law.

Right to an objection

You are entitled at any time to:

- ✓ object against the processing of your personal data if there are legal grounds for doing so; when the objection is justified, the personal data of the respective natural person may not be processed any further;
- ✓ object against the processing of your personal data for the purposes of direct marketing.

Right to an appeal or to a complaint

The applications for access to information or for correction shall be submitted in person or by a person explicitly authorized by you by means of a notarized power of attorney.

We are obligated to pass judgement on your application within a 14-day time limit of its submission. If a longer time period is reasonably needed for the purpose of collecting all requested data and this longer time period would facilitate our work, this time limit can be extended to 30 days. By virtue of our resolution we either grant or refuse access to the information requested by the applicant but in all cases we provide justification for our response.

UP-TO-DATE POLICY AND CHANGES IN POLICY

For the purpose of applying up-to-date protection measures and for the purpose of complying with the applicable legislation, we shall update on a regular basis this Personal Data Protection Policy.

