



Data Controller:

EUROCOM & Co, s.r.o.

Pribinova 18, 811 09 Bratislava, ID No.: 35761172, company registered in the Commercial Register of the City Court Bratislava I, Section: Sro, File No.: 18599/B

Operation: Hotel Gino Park Palace****

Orlové 116, 017 01 Považská Bystrica

(hereinafter referred to as the "Operator")

provides, for the purpose of fairness and transparency towards data subjects, the following information to the data subject on the processing of personal data pursuant to the Articles 13. a 14. 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 (hereinafter referred to as the "Regulation") and Article 19 of Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments and Additions to Certain Acts under the title:

PRIVACY POLICY

A. Purpose of processing of personal data in accounting documents

In the context of the activity, personal data are processed for the purpose of keeping the records necessary to comply with the legal obligation of the controller to process accounting documents.

The data subjects are: natural persons

List of personal data: name, surname, title, permanent address, temporary address, telephone number, e-mail address, date of birth, type and number of identity document, signature, bank account number of the natural person

The legal basis for the processing of personal data consists of:

- Act No. 431/2002 Coll. on Accounting, as amended
- Act No. 222/2004 Coll. on Value Added Tax, as amended
- Act No 595/2003 Coll. on Income Tax, as amended



- Act No 40/1964 Coll., the Civil Code, as amended
- Act No 152/1994 Coll. on the Social Fund and on amendment and supplementation of Act No 286/1992 Coll. on Income Taxes, as amended

Categories of recipients: the Tax Office - processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of Act No. 595/2003 Coll. on Income Tax, as amended, Courts, the Public Prosecutor's Office - processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of Act No. 301/2005 Coll. on the Criminal Procedure Code, as amended. Act No. 162/2015 Coll., Administrative Procedure Code as amended by Act No. 88/2017 Coll., Act No. 125/2016 Coll., Act on Certain Measures Related to the Adoption of the Civil Procedure Code, the Civil Procedure Code and the Administrative Procedure Code and on Amendments and Additions to Certain Acts, Authorized State Authority - processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of the General Data Protection Regulation.

Time limits for erasure of personal data:

We store your personal data in accordance with the specific regulation and the valid Registry Plan and Regulations published on the website in the section Privacy.

B. Purpose of processing of personal data in the Incoming and Outgoing Mail Register and in the management of the registry:

Within the scope of the activity, personal data are processed in the registration of incoming and outgoing mail and in the management of the registry.

The persons concerned are: natural persons - addressees, employees

List of personal data: birth number, name, surname, title, address, name of organization, job title, e-mail address, subject and content of mail

Legal basis for the processing of personal data:

- Act No. 395/2002 Coll. on archives and registers and on the amendment of certain acts, as amended
- Act No. 305/2013 Coll. on the electronic form of exercising the powers of public authorities and on amending and supplementing certain acts
- Act No 369/1990 Coll. on Municipal Establishment, as amended

Categories of recipients: the Ministry of the Interior of the Slovak Republic - the processing is necessary for the fulfilment of the legal obligation of the operator pursuant to: the Act No. 369/1990 Coll. on Municipal Establishment, as amended. Act No. 395/2002 Coll. on archives and registers and on the amendment of certain acts as amended, Courts, OČTK -processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of Act No. 301/2005 Coll. on the



Criminal Procedure Code as amended, Act No. 162/2015 Coll. on the Administrative Procedure Code as amended by Act No. 88/2017 Coll. on the Administrative Procedure Code as amended by Act No, Act No. 125/2016 Coll., Act on certain measures related to the adoption of the Civil Procedure Code, the Civil Procedure Code and the Administrative Procedure Code and on amendments and supplements to certain acts, Authorised State Authority - the processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of the General Data Protection Regulation

Time limits for erasure of personal data: ordinary correspondence - 5 years, registry register 10 years

C. Purpose of processing of personal data in the records of accommodated guests and in the register of foreigners

Within the scope of the activity, personal data is processed for the purpose of registering hotel services, hotel guests, room reservations, registration of personal data in the hotel system and registration of foreign guests.

The persons concerned are: Clients - accommodated guests.

List of personal data: name, surname, title, place of residence, ID card number, name, surname, title, place of residence, ID card number of other accommodated guests, name, surname, title, date and place of birth of the foreigner, nationality, permanent residence in the home country, purpose of travel to the Slovak Republic, passport number, visa: type, number, validity, name and address of the accommodation facility in the Slovak Republic, children travelling with them, length of stay in Slovakia, telephone number, email contact

Legal basis for the processing of personal data:

- Act No. 40/1964 Coll. Civil Code
- Act No. 595/2003 Coll. on income tax
- Act No. 582/2004 Coll. on local taxes and local fee for municipal waste and small construction waste, as amended
- Act No 222/2004 Coll. on value added tax
- Act No 404/2011 on the residence of foreigners and on amending and supplementing certain acts
- Act No 431/2002 Coll. on Accounting
- Act No. 496/2008 Coll., full text Act No. 253/1998 Coll. on reporting the residence of citizens of the Slovak Republic and the population register of the Slovak Republic, as amended



Categories of recipients: the Tax Office - processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of Act No. 595/2003 Coll. on Income Tax as amended, Courts, the CID - processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of Act No. 301/2005 Coll. on Criminal Procedure as amended, Act No. 162/2015 Coll. on Administrative Procedure Code as amended by Act No. 88/2017 Coll. on, Act No. 125/2016 Coll., Act on certain measures related to the adoption of the Civil Procedure Code, the Civil Procedure Code and the Administrative Procedure Code and on amendments and supplements to certain acts, Authorised State Authority - the processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of the General Data Protection Regulation

Time limits for the deletion of personal data: we store your personal data in accordance with a special regulation and the applicable Registry Plan and Regulations published on the website in the section Personal Data Protection

Purpose of processing personal data when sending marketing offers

Within the scope of the activities of the controller, personal data is processed for the **purpose of registering clients who have agreed to receive marketing offers.**

The data subjects are: Clients

List of personal data: name, surname, email, telephone number

Legal basis for the processing of personal data: consent of the data subject, which the data subject has given voluntarily and may revoke at any time at the following address: marketing@parkpalace.sk

Categories of recipients: Courts, CID - processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of Act No. 301/2005 Coll., the Criminal Procedure Code as amended, Act No. 162/2015 Coll., the Administrative Procedure Code as amended by Act No. 88/2017 Coll., Act No. 125/2016 Coll., and Act No, Act on Certain Measures Related to the Adoption of the Civil Procedure Code, the Civil Procedure Code and the Administrative Procedure Code and on Amendments and Additions to Certain Acts, Authorised State Authority - the processing is necessary for the fulfilment of the legal obligation of the controller, within the meaning of the General Data Protection Regulation, email gateway (e.g. Mailchimp).

Periods for erasure of personal data: personal data will be processed for the duration of the consent to receive marketing offers.

E., Purpose of the processing of personal data in the complaint register

Within the scope of the activities of the controller, personal data are processed for the purpose of handling complaints.



The data subjects are: clients and persons making a complaint

List of personal data: name, surname, title, place of residence, telephone, e-mail and description of complaint

Legal basis for the processing of personal data:

- Act No. 250/2007 Coll. on consumer protection
- Act No. 372/1990 Coll. on offences, as amended, and other related generally binding legal regulations
- Act No 40/1964 Coll., the Civil Code, as amended

Categories of recipients: the SOI - Act No. 40/1964 Coll., the Civil Code as amended, Act No. 128/2002 Coll. Act No. 301/2005 Coll., the Criminal Procedure Code as amended, Act No. 162/2015 Coll., the Administrative Procedure Code as amended by Act No. 88/2017 Coll., the Administrative Procedure Code - the processing is necessary to fulfil the legal obligation of the operator, pursuant to Act No, Act No. 125/2016 Coll., Act on certain measures related to the adoption of the Civil Procedure Code, the Civil Procedure Code and the Administrative Procedure Code and on amendments and supplements to certain acts, Authorised State Authority - the processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of the General Data Protection Regulation

Periods for deletion of personal data: we store your personal data in accordance with a special regulation and the current Registry Plan and Regulations, which is available for consultation at the reception of the hotel.

F., Purpose of processing of personal data in the records of clients using prepaid vouchers and tickets

Within the scope of the activities of the controller, personal data are processed for the purpose of the sale of vouchers and tickets

The data subjects are: clients, employees

List of personal data: title, name, surname, residence, telephone number, email, ID number, date of birth

Legal basis for processing personal data: Purchase contract, Tax document

Categories of recipients: Courts, CID - the processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of Act No. 301/2005 Coll., the Criminal Procedure Code as amended, Act No. 162/2015 Coll., the Administrative Procedure Code as amended by Act No. 88/2017 Coll., Act No. 125/2016 Coll, Act on



Certain Measures Related to the Adoption of the Civil Procedure Code, the Civil Procedure Code and the Administrative Procedure Code and on Amendments and Additions to Certain Acts, Authorised State Authority - the processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of the General Data Protection Regulation

Time limits for erasure of personal data: we store your personal data in accordance with the special regulation and the applicable Registry Plan and Regulations published on the website in the section Personal data protection

G., Purpose of the processing of personal data in the photo database

The processing of personal data (photographs and video footage) for the purpose of presenting the activities of the controller

The data subjects are: employees, clients, suppliers.

List of personal data: name, surname, photograph

Legal basis for the processing of personal data: the data subject's consent, which the data subject has given voluntarily and may revoke at any time at the following address: marketing@parkpalace.sk

Categories of recipients: Courts, CID - the processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of Act No. 301/2005 Coll., the Criminal Procedure Code as amended, Act No. 162/2015 Coll., the Administrative Procedure Code as amended by Act No. 88/2017 Coll., Act No. 125/2016 Coll, Act on Certain Measures Related to the Adoption of the Civil Procedure Code, the Civil Procedure Code and the Administrative Procedure Code and on Amendments and Additions to Certain Acts, Authorised State Authority - the processing is necessary for the fulfilment of the legal obligation of the controller within the meaning of the General Data Protection Regulation

Time limits for erasure of personal data: Personal data will be processed for the duration of the consent to publish the photographs.

H., Purpose of processing personal data in the Camera Information System

Within the framework of the activities of the controller, personal data are processed on the basis of a specific need and requirement, in particular for the protection of public order and security, crime detection, health and property protection.

The persons concerned are: employees, clients, suppliers

List of personal data: CCTV footage



Legal basis for processing personal data: Legitimate interest of the controller

Categories of recipients: Courts, CID - the processing is necessary to fulfil the legal obligation of the controller within the meaning of Act No. 301/2005 Coll., the Criminal Procedure Code as amended, Act No. 162/2015 Coll., the Administrative Procedure Code as amended by Act No. 88/2017 Coll, Act No. 125/2016 Coll., the Act on Certain Measures Related to the Adoption of the Civil Procedure Code, the Civil Procedure Code and the Administrative Procedure Code and on Amendments and Additions to Certain Acts, the Authorised Body of the State - the processing is necessary for the fulfilment of a legal obligation of the controller, within the meaning of the General Data Protection Regulation

Time limits for erasure of personal data: 90 days

I., Purpose of processing of personal data in the register of job seekers:

In the framework of the activity, personal data are processed in the registration of applicants for job applicants

The persons concerned are: Natural persons - job seekers

List of personal data: name, surname, title, permanent residence, temporary residence, date of birth, telephone number, education, work experience, e-mail address, other data in the scope of CV, motivation letter and job application

Legal basis for the processing of personal data: consent of the data subject

Categories of recipients: bodies entrusted by a specific regulation with the power to take decisions the rights and obligations of individual persons (e.g. courts).

Periods for erasure of personal data: 3 years

The data subject shall have the right to withdraw consent to the processing of personal data concerning him or her at any time. Withdrawal of consent shall not affect the lawfulness of the processing of personal data based on consent prior to its withdrawal; the data subject shall be informed of this fact before consent is given. The data subject may withdraw the consent in the same way in which he or she gave the consent.

**Your rights under the EU Regulation
and the Data Protection Act**

We consider it important that you understand that the personal data we process is your data and that there are rights associated with the processing of that data. In addition to the right to withdraw consent to the processing of your personal data, you have other rights under the Regulation and the Data Protection Act.



1. Right of access

You have the right to be provided with a copy of the personal data we hold about you and information about how we use your personal data. In most cases, your personal data will be provided to you in written paper form, unless otherwise requested by you. If you have requested this information by electronic means, it will be provided to you electronically where technically possible.

2. Right to redress

We take reasonable steps to ensure that the information we hold about you is accurate, complete and up to date. If you believe that the information, we hold is inaccurate, incomplete or out of date, please do not hesitate to ask us to amend, update or supplement this information.

3. Right to erasure

In certain circumstances, you have the right to ask us to erase your personal data, for example if the personal data we have collected about you is no longer necessary for the fulfilment of the original purpose of the processing or if you withdraw your consent to the processing.

This right can only be exercised after considering all the relevant circumstances and obligations, such as legal and regulatory obligations.

4. The right to restrict processing

In certain circumstances, you are entitled to ask us to stop using your personal data. These include, for example, where you believe that the personal data we hold about you may be inaccurate or where you believe that we no longer need to use your personal data.

This right of yours can only be exercised after considering all the relevant circumstances and obligations, such as legal and regulatory obligations.

5. Right to data portability

In certain circumstances, you have the right to ask us to transfer the personal data you have provided to us to another third party of your choice. However, the right of portability only applies to personal data that we have obtained from you on the basis of consent or on the basis of a contract to which you are a party.

6. Right to object

You have the right to object to processing based on our legitimate interests. If we do not have a compelling legitimate ground for processing and you object, we will not process your personal data further.



7. Rights relating to automated decision-making

You have the right to object to automated decision-making, including profiling, which results in a legal or similar significant consequence for you.

The controller does not normally use automated decision-making or profiling.

8. Right to withdraw consent

In most cases, we do not process your personal data on the basis of your consent. However, it may be that we ask for your consent in specific cases. Where we do, you have the right to withdraw your consent to the continued use of your personal data.

9. Right to complain

If you wish to make a complaint about the way your personal data is processed, including exercising the rights set out above, you can contact our Data Protection Officer by email: info@parkpalace.sk. Please be assured that we will properly investigate all your suggestions and complaints.

If you are not satisfied with our response, or if you believe that we are processing your personal data unfairly or unlawfully, you may lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, <https://dataprotection.gov.sk/uouu/>, Hraničná 12, 820 07 Bratislava 27; telephone number: +421 2 32313214; e-mail: statny.dozor@pdp.gov.sk