

Operator Hotel Zochova chata* ***, Piesok 4015/B7, 900 01 Modra, Business ID: 36689483 accesses your personal data responsibly and therefore pursuant to 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, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the "GDPR") and the act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts (hereinafter referred to as the "Act"), discloses other necessary information to you as the data subject (the natural person whose personal data is processed).

If you have any questions related to the protection of personal data, you can contact us by phone: +421 33 2633 300 or e-mail: sekretariat@hzch.sk, or directly at: Hotel Zochova chata****, Piesok 4015/B7, 900 01 Modra, Business ID: 36689483

The Operator declares in order to ensure the protection of the rights of the data subjects, it has taken appropriate technical and organizational measures and had the security documentation, declaring the lawful processing of personal data, prepared by osobnyudaj.sk, s.r.o..

The Operator also declares in order to ensure the protection of the rights of the data subjects, it entrusted the company osobnyudaj.sk, s.r.o. with the external exercise of the Responsible Person (DPO/ZO¹). Individual information may be obtained by the data subject by calling the phone number: +421 948 296 548 or by e-mail: pravne@osobnyudaj.sk. Mandatory information is also available for consultation directly at the Operator's domicile.

Operator's processing activities

One of the principles of personal data processing is the principle of purpose limitation. According to this principle, personal data may only be collected for a specific, explicit and legitimate purpose and may not be further processed in a manner incompatible with that purpose.

The processing of personal data should be closely linked to the purpose of the processing of personal data, in particular as regards the list or scope of the personal data processed which should be necessary for the purpose to be achieved by the processing of the personal data in question.

It is not right for the list or scope of personal data to be artificially or additionally extended in relation to the purpose. If the purpose and list or scope of personal data is set by law, it shall be respected; if the list or scope of personal data processed is determined by the operator, this shall ensure it is not unnecessarily extended beyond the purpose.

The Act on the Personal Data Protection stipulates the obligation of the operator to provide the data subject with information on the purpose of personal data processing for which his or her personal data are intended, even if the personal data are not collected directly from the data subject.

It is necessary the data subject is provided with this information at the latest when obtaining his or her personal data, or in sufficient time, in a clear and comprehensible manner and in such a way that he or she can actually become acquainted with and understand the information.

The purpose of processing your personal data is to provide you with fully-fledged accommodation services. Personal data we process for this purpose are necessary for the performance of the accommodation contract and also for the implementation of measures before the conclusion of the contract. We also have certain obligations under the relevant legislation. Below you can find the information relating to a specific processing activity of your personal data.

¹ DPO – Data protection officer/ZO – Responsible person

Guest accommodation records

Purpose of personal data processing – registration of natural persons staying in the hotel.

Categories of personal data processed – name, surname, title, residence, ID number, signature, card number, its expiration date and the name of the card holder.

Special categories of personal data processed – no special categories of personal data are processed.

Categories of data subjects – applicants for accommodation.

Provision of personal data to the third parties – courts, law enforcement authorities, foreign police, other authorized entity in accordance with the Act of the Personal Data Protection or other special legal regulation.

Cross-border transfer of personal data – not taking place.

Information on the existence of automated decision-making, including profiling – not taking place.

Time limits for personal data deleting

Correspondence – 3 years.

Accommodation – 5 years.

Legal basis for the processing of personal data – Article 6 (1), points (b) and (c) of the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, Act No. 253/1998 Coll. on Notification of Residence of Citizens of the Slovak Republic and the Register of Residents of the Slovak Republic, Act No. 40/1964 Coll. Civil Code, Act No. 48/2008 Coll. on the Residence of Foreigners and on Amendments to Certain Acts, Act No. 582/2004 Coll. on Local Taxes and Local Fee for Municipal Waste and Small Construction Waste, as amended.

Providing personal data is necessary for the conclusion of the accommodation contract. If not providing your personal data, we will not be able to provide you with our accommodation services.

BOOKING SYSTEM

Purpose of personal data processing – reservation, sale and use of services by clients in the operator's facilities and control of their use.

Categories of personal data processed – name, surname, title, residence, e-mail address, phone number, date and duration of reservation.

Special categories of personal data processed – no special categories of personal data are processed.

Categories of data subjects – applicants for booking.

Provision of personal data to the third parties – courts, law enforcement authorities, other authorized

entity in accordance with the Act of the Personal Data Protection or other special legal regulation.

Cross-border transfer of personal data – not taking place.

Information on the existence of automated decision-making, including profiling – not taking place.

Time limits for personal data deleting

Correspondence – 3 years.

Legal basis for the processing of personal data – Article 6 (1), point (b) of the Regulation (EU) 2016/679 of the European Parliament on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

Providing personal data is necessary for the conclusion of the accommodation contract. If not providing your personal data, we will not be able to provide you with our accommodation services.

RECORDING OF COMPLAINTS

Purpose of personal data processing – recording of complaints.

Categories of personal data processed – name, surname, title, residence, e-mail address, phone number, number of the claimed product, date and time of the complaint.

Special categories of personal data processed – no special categories of personal data are processed.

Categories of data subjects – consumers claiming goods.

Provision of personal data to the third parties – courts, law enforcement authorities, other authorized entity in accordance with the Act of the Personal Data Protection or other special legal regulation.

Cross-border transfer of personal data – not taking place.

Information on the existence of automated decision-making, including profiling – not taking place.

Time limits for personal data deleting

Correspondence – 3 years.

Complaints of goods and services – 5 years.

Legal basis for the processing of personal data – Article 6 (1), points (b) and (c) of the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, Act No. 250/2007 Coll. on Consumer Protection and on Amendments to the Act of the Slovak National Council No. 372/1990 Coll. on Offences, as amended, Act No. 40/1964 Coll., Civil Code

MARKETING

Purpose of personal data processing – sales support – marketing offers, newsletter, product information and news.

Categories of personal data processed – name, surname, title, residence, e-mail address, phone number, date of birth, national ID number.

Special categories of personal data processed – no special categories of personal data are processed.

Categories of data subjects – clients and customers.

Provision of personal data to the third parties – courts, law enforcement authorities, other authorized entity in accordance with the Act of the Personal Data Protection or other special legal regulation.

Cross-border transfer of personal data – not taking place.

Information on the existence of automated decision-making, including profiling – not taking place.

Time limits for personal data deleting

Contracts – 10 years.

Correspondence – 3 years.

Legal basis for the processing of personal data – Article 6 (1), point (a) of the Regulation (EU) 2016/679 of the European Parliament on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

In addition to the above processing activities, we keep records of suppliers and customers in the provision of services and goods, records of your inquiries and complaints in connection with the exercise of your rights as data subjects, we make photographs and video presentations and record incoming and outgoing communications (postal and electronic).

If you apply for a job in our hotel, we will keep your personal data in a separate register. In this context, you will be specifically informed in the selection process itself.

Intermediaries, recipients and third parties

In connection with the processing of personal data of the guests accommodated and for the purpose of making reservations in the premises of our hotel (hotel rooms, lounge, meeting room and others), we would like to inform you we do not provide your personal data to any other entity. For these purposes, we only, as the operators, process your personal data.

Rights of the data subject

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the "GDPR Regulation") and Act No. 18/2018 Coll. on the protection of personal data and on amendments to certain laws (hereinafter referred to as the "Act") guarantee you, as a data subject, the following rights:

- a) the right of the Data Subject to access personal data, the content of which is:
 - (i) the right to obtain from the Controller confirmation as to whether personal data relating to the Data Subject are being processed;
 - (ii) in the case the personal data of the Data Subject are processed, the right to access the personal data processed and the right to obtain the following information:
 - information on the purposes of the processing;
 - information on the categories of personal data concerned;
 - information on the recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly in the case of recipients in third countries or international organisations;
 - where possible, information on the expected duration of keeping personal data or, where that is not possible, information on the criteria for its determination;
 - information on the existence of the right to request from the Operator the correction of personal data concerning the Data Subject or their deletion or restriction of processing, and on the existence of the right to object to such processing;
 - information on the right to submit a complaint with the supervisory authority;
 - if the personal data have not been obtained from the Data Subject, any available information regarding the source;
 - information on the existence of automated decision-making, including profiling as referred to in Article 22 (1) and (4) of the Regulation and, in these cases, at least, meaningful information about the procedure used, as well as the significance and anticipated consequences of such processing of personal data for the Data Subject;
 - (iii) the right to be informed on the appropriate guarantees under the Article 46 of the Regulation concerning the transfer of personal data, if these are transferred to a third country or an international organisation;
 - (iv) the right to provide a copy of the personal data being processed, provided, however, that the right to provide a copy of the personal data being processed shall not adversely affect the rights and freedoms of others;

The right of the Data Subject to access personal data means, by its nature, that the Data Subject has the right to obtain from us confirmation of whether personal data relating to him or her are being processed and, if so, the right to access such personal data. At the request of the Data Subject, we will provide a copy of the personal data being processed. For any further copies requested by the Data Subject, we may charge a reasonable fee corresponding the administrative costs. If the Data Subject has submitted a request by electronic means, the information shall be provided in a commonly used electronic form, unless the Data Subject has requested otherwise. The information shall be provided immediately and at the latest within one month. We have the right to extend the processing period of the application by another 2 months if the request is complex or frequent. However, the Data Subject must notified within 1 month of the reason for the extension of the processing period. In the case of an unjustified or too frequent request, we have the right to charge a reasonable fee or reject the request. We must explain the reason for the refusal and the right of the data subject to submit a complaint to a supervisory authority.

- b) the right of the Data Subject to correct personal data, the content of which is:

- (i) the right for the Operator to correct inaccurate personal data concerning the Data Subject without undue delay;
- (ii) the right to supplement incomplete personal data of the Data Subject, including by providing a supplementary statement of the Data Subject;

The right of the Data Subject to correct personal data means that you can ask us to correct or complete your personal data at any time if they would be inaccurate or incomplete. The data subject has the right to supplement incomplete personal data, including by providing a supplementary statement.

- c) the right of the Data Subject to delete personal data (the so-called "right to forget"), the content of which is:
 - (i) the right to obtain from the Operator, without undue delay, the deletion of personal data concerning the Data Subject, if any of the following reasons is met:
 - the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - the data subject withdraws the consent on the basis of which the processing is carried out, provided that there is no other legal basis for the processing of personal data;
 - the data subject shall object to the processing of personal data pursuant to Article 21 (1) of the Regulation and any legitimate grounds for the processing of personal data do not prevail or the Data Subject objects to the processing of personal data pursuant to Article 21 (2) of the Regulation;
 - the personal data have been processed illegally;
 - personal data must be deleted in order to comply with a legal obligation under the law of the European Union or the law of the Member State which the Operator is subject to;
 - personal data have been collected in connection with the offer of information society services pursuant to Article 8 (1) of the Regulation;
 - (ii) the right for the Operator, who has disclosed the personal data of the Data Subject, to take into account the available technology and costs of implementing the measures, to take appropriate measures, including technical measures, to inform other operators who process personal data that the Data Subject asks them to delete all references to such personal data, their copy or replicas;

at the same time, the right to delete personal data containing rights under Article 17 (1) and (2) of the Regulation (i.e. containing the rights under (i) and (ii) of the letter c) point J. of this document) shall not arise if the processing of personal data is necessary:

1. the exercise of the right of freedom of expression and information;
2. to fulfill a legal obligation that requires processing under the law of the European Union or the law of the Member State which the Operator is subject to, or to fulfill a task carried out in the public interest or in the exercise of public power delegated to the Operator;
3. for reasons of public interest in the field of public health in accordance with Article 9 (2) points (h) and (i) of the Regulation, as well as Article 9 (3) of the Regulation;
4. for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes pursuant to Article 89 (1) of the Regulation, as far as it is likely the right referred to in Article 17 (1) of the Regulation will make impossible or seriously difficult to achieve the purposes of such processing of personal data; or
5. to establish, exercise or defend legal claims;

Thus, the right of the Data Subject to delete personal data means we must delete your personal data if (i) they are not necessary for the purposes for which they were collected or otherwise processed, (ii) processing is unlawful, (iii) you object to processing and there are no overriding legitimate reasons for processing, or (iv) we are required to do so by law.

- d) the right of the Data Subject to restrict the processing of personal data, the content of which is:
 - (i) the right for the Operator to limit the processing of personal data in one of the following cases:
 - The data subject challenges the accuracy of personal data during a period allowing the Operator to verify the accuracy of personal data;
 - the processing of personal data is unlawful and the Data Subject objects to deleting personal data and requests restriction of their use instead;
 - The Operator no longer needs personal data for the purposes of processing, but the Data Subject needs them to prove, exercise or defend legal claims;
 - The data subject has objected to the processing pursuant to Article 21 (1) of the Regulation, until verification whether the legitimate reasons on the part of the Operator prevail over the legitimate reasons of the Data Subject;
 - (ii) the right, if the processing of personal data is restricted pursuant to subpoint (i) of the letter (d) point J. of this document, such limited personal data shall, with the exception of storage, be processed only with the consent of the Data Subject or for the establishment, exercise or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the European Union or a Member State;
 - (iii) the right to be informed in advance on the cancellation of the restriction of the processing of personal data;

The right of the Data Subject to restrict the processing of personal data means that unless we resolve any disputes regarding the processing of your personal data, we must limit the processing of your personal data so that we can only store and not further process the personal data of the Data Subject.

- e) the right of the Data Subject to fulfilment of the notification obligation towards the recipients, the content of which is:
 - (i) the right of the Operator to notify any recipient that the personal data have been provided to on any correction or deletion of personal data or restriction of processing carried out pursuant to Article 16, Article 17 (1) and Article 18 of the Regulation, unless this proves impossible or involves a disproportionate effort;
 - (ii) the right for the Operator to inform the Data Subject about these recipients, if the Data Subject requests so;

The right of the Data Subject to fulfilment of the notification obligation towards the recipients means the obligation of the Operator to notify each recipient that the Data Subject's personal data has been provided to on any correction and deletion of personal data or restriction of their processing. The Operator does not have this obligation only if such notification is impossible for objective reasons or requires a disproportionate effort

- f) the right of the Data Subject to the portability of personal data, the content of which is:
 - (i) the right to obtain personal data relating to the Data Subject and provided to the Operator in a structured, commonly used and machine-readable format and the right to transfer such data to another operator without being hindered by the Operator if:
 - the processing is based on the consent of the Data Subject pursuant to Article 6 (1) point (a) of the Regulation or Article 9 (2) point (a) of the Regulation, or on a contract pursuant to Article 6 (1) point (b) of the Regulation, and at the same time

- processing is carried out by automated means, and at the same time
 - the right to obtain personal data in a structured, commonly used and machine-readable format and the right to transfer such data to another operator without being hindered by the Operator shall not adversely affect the rights and freedom of others;
- (ii) the right to transfer personal data directly from one operator to another, if technically possible;

The right to data portability means you have the right to obtain from us your personal data previously provided to us in a structured, commonly used and machine-readable format and you have the right to request we transfer your personal data to another operator in compliance with legal conditions; the exercise of this right does not affect your right to delete your personal data. However, the right to portability applies only to personal data that we have obtained from you under a contract which you are a party of.

- g) the right of the Data Subject to object, the content of which is:
- (i) the right to object at any time, for reasons relating to a specific situation of the Data Subject, to the processing of personal data concerning him or her carried out pursuant to Article 6 (1) point (e) or (f) of the Regulation, including objection to profiling based on the provisions of the Regulation;
 - (ii) [in the case of exercising the right to object at any time, for reasons relating to a specific situation of the Data Subject, to the processing of personal data concerning him or her carried out pursuant to Article 6 (1) point (e) or (f) of the Regulation, including objection to profiling based on the provisions of the Regulation] the right for the Operator not to further process the personal data of the Data Subject, unless it demonstrates the necessary legitimate reasons for processing that prevail over the interests, rights and freedoms of the Data Subject, or reasons for proving, exercising or defending legal claims;
 - (iii) the right to object at any time to the processing of personal data concerning the Data Subject for the purposes of direct marketing, including profiling to the extent related to direct marketing; where the Data Subject objects to the processing of personal data for the purposes of direct marketing, the personal data may no longer be processed for such purposes;
 - (iv) (in relation to the use of information society services) the right to object to the processing of personal data by automated means using technical specifications;
 - (v) the right to object, for reasons relating to the specific situation of the Data Subject, to the processing of personal data concerning the Data Subject where the personal data are processed for scientific or historical research purposes or for statistical purposes pursuant to Article 89 (1) of the Regulation, except where processing is necessary for the performance of a task in the public interest;

Thus, the right of the Data Subject to object means that as a Data Subject you may object to the processing of your personal data that we process for direct marketing purposes or for legitimate reasons. When processing personal data for marketing purposes, we will stop immediately after receiving an objection.

- h) the right of the Data Subject related to automated individual decision-making, the content of which is:
- (i) the right for the Data Subject not to be subject to a decision which is based solely on automated processing of personal data, including profiling, and which produces legal effects concerning it or similarly significantly affects it, except in accordance with Article 22 (2) of the Regulation [i.e. unless the decision is: (a) necessary for the conclusion or performance of a contract between the Data Subject and the Operator, (b) permitted by the European Union law or the law of the Member State to which the Operator is subject to and which also provides appropriate measures guaranteeing the protection of the rights and freedoms and legitimate interests of the Data Subject, or (c) based on the express consent of the Data Subject].

The right of the Data Subject related to automated individual decision-making means that, as a Data Subject, you have the right not to be subject to a decision which is based solely on automated processing, including profiling, and which has legal effects concerning or similarly significantly affecting you. In cases where such processing is necessary for the conclusion or performance of the contract or based on the express consent of the Data Subject, the Operator shall take appropriate measures to protect the rights and freedoms and legitimate interests of the Data Subject, in particular, they shall take minimum measures, such as the right of human intervention by the Operator, the right of the Data Subject to express his or her opinion and the rights of the Data Subject to challenge the decision.

- g) The right of the Data Subject to file a motion to initiate proceedings in accordance with the provisions of § 100 of the Personal Data Protection Act, the content of which is:
- (i) the right of the Data Subject, who believes there is an unauthorized processing of his or her personal data or there has been an abuse of his or her personal data, to file a motion to the Office for Personal Data Protection of the Slovak Republic (hereinafter referred to as the "Office") to initiate proceedings on the protection of personal data.
 - (ii) The motion to initiate proceedings may be filed in writing, in person orally in the minutes, by electronic means, there must be signed with a guaranteed electronic signature, by telegram or fax, which must be added in writing or orally to the minutes no later than within 3 days.
 - (iii) Pursuant to the provisions of § 100 (3) of the Personal Data Protection Act, the motion in question must contain:
 - name, surname, permanent address and signature of the applicant,
 - indication of the person against whom the application is addressed; name and surname, registered office or permanent residence, or legal form and identification number,
 - the subject of the motion with an indication of which rights, according to the applicant, have been violated in the processing of personal data,
 - evidence to support the allegations made in the motion,
 - a copy of the document proving the exercise of the right under § 28, if such a right could be applied, or an indication of the reasons worthy of special consideration.
 - (iv) The Office shall then decide on the applicant's motion within 60 days from the start of the procedure. In duly justified cases, the Office may extend that period by a maximum of six months. The Office shall inform the parties in writing of the extension.
 - (v) You can find a template of the motion initiating the proceedings on the website of the Office (<https://dataprotection.gov.sk/uouu/sk/content/konanie-o-ochrane-osobnych-udajov>).

If you believe your rights as a Data Subject have been violated, you can also directly contact the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic.

The Office for Personal Data Protection of the Slovak Republic
Hraničná 12
820 07, Bratislava 27
Slovak Republic
Business ID: 36 064 220

The Office of Filing:
Mon – Thu: 8:00 - 15:00
Fri: 8:00 - 14:00

Telephone consultations for the personal data protection:
Tue and Thu from 8:00 to 12:00 +421 2 323 132 20
Secretariat of the President of the Office +421 2 323 132 11
Secretariat of the Office +421 2 323 132 14
Fax: +421 2 323 132 34
Spokesperson:
mobile: 0910 985 794
e-mail: hovorca@pdp.gov.sk

E-mail :

- a) generally: statny.dozor@pdp.gov.sk
- b) to provide information pursuant to Act No. 211/2000 Coll.: info@pdp.gov.sk
- c) website: webmaster@pdp.gov.sk
- d) use the online form to submit requests for information under Act No. 211/2000 Coll. on Free Access to Information.
- e) e-mail address via which the Office will provide you with advice in the on personal data protection. It is intended for children, youth, students, teachers, parents who suspect that their personal data has been misused: ochranu@pdp.gov.sk

Camera information system

Since the processing of personal data takes place in connection with the use of the camera system, we would like to inform you as a data subject about your rights and the conditions for the processing of your personal data. At the same time, we would like to assure you the protection of your personal data is important for our community and for this purpose we have security measures in place in accordance with the GDPR.

Pursuant to Art. 32 of the General Data Protection Regulation, the Operator, taking into account the latest knowledge, bears the costs of implementing measures and of the nature, scope, context and purposes of processing, as well as risks of varying likelihood and severity to the rights and freedoms of natural persons, and has taken appropriate technical and organizational measures to ensure a level of security appropriate to this risk.

Persons authorized to access the recording equipment are entrusted with the processing of personal data, observe confidentiality of personal data which they come into contact with and are regularly trained in the field of personal data protection. Unauthorised persons shall not have access to the recording equipment.

The Operator of the camera information system is: Hotel Zochova chata****, Piesok 4015/B7, 900 01 Modra, Business ID: 36689483

Contact for Responsible Person: osobnyudaj.sk, s.r.o., 02/800 800 80, pravne@osobnyudaj.sk

Purpose of personal data processing: protection of property against theft or damage

Legal basis for the processing of personal data: Article 6 (1) point (f) of the General Data Protection Regulation necessary for the purposes of the legitimate interests pursued by the Operator – namely the protection of property against theft or damage.

Cameras that monitor both outdoor and indoor spaces.

Each entrance to the monitored area is marked with a pictogram and an indication that the area is monitored by a camera system.

Category of recipients:

A recipient in a third country or international organisation: none

A recipient in an EU or EEA Member State: none

Public authority that processes PDs on the basis of law: law enforcement authorities and court.

Transfer of personal data: data transfer does not take place.

Retention period: Where the record is not used for the purposes of criminal or offence proceedings, the record shall be automatically destroyed in the information system within 72 hours from the day following the one which the record was issued on.

The Operator does not perform automated decision-making, including profiling, referred to in Article 22 (1) to (4) of the GDPR.

Information on the rights of the data subject: The Operator, as a data subject within the meaning of 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, repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as the "GDPR Regulation") and Act No. 18/2018 Coll. on the protection of personal data and on amendments to certain laws (hereinafter referred to as the "Act"), has the rights defined above.