

## **PRIVACY POLICY**

### **INFORMATION ABOUT US AND INTRODUCTORY PROVISIONS**

Company **GRAND HOTEL PARK d.o.o.**, Dubrovnik (City of Dubrovnik), Mata Vodopića 2, MBS (Company's Registration No.): 060190211, OIB (Tax No.): 23287280171, (hereinafter referred to as: **Company**) is committed to ensuring your privacy and protecting your personal information. The collection, use and processing of your personal data are carried out in accordance with this Privacy Policy and relevant legal regulations, including Regulation (EU) 2016/679 of 27 April 2016 (hereinafter: "**General Data Protection Regulation**") and the Act on Implementation of the General Data Protection Regulation (official gazette NN 42/2018).

This Policy aims to uphold the principle of transparency by providing data subjects with accurate and comprehensive information regarding the collection, use, disclosure, and processing of their personal data by the Company. It ensures that individuals are aware of the extent to which their personal data is or will be processed.

This Policy is valid for and applicable to the collection, processing, and protection of your personal data, as well as the use of cookies and other similar analytical tools when you visit, register, and use the web portal <https://www.grandhotel-park.hr/>, including all its subdomains.

We recommend that you take the time to thoroughly read this document. It includes our privacy policy and details about how we handle your personal data when you visit our website, book accommodation, stay at one of our facilities, or communicate with us in any other way.

### **DATA PROTECTION OFFICER AND CONTACT INFORMATION**

The Company has appointed a Data Protection Officer who can be contacted for any questions or complaints regarding the protection of your personal data. You can reach out to them in the following ways:

- by e-mail: [fani@grandhotel-park.hr](mailto:fani@grandhotel-park.hr)
- by mail to the following address: Mata Vodopića 2, FAO Data Protection Officer

Any requests that are unrelated to the protection of personal data and are directed to the Data Protection Officer will be promptly forwarded to the appropriate departments of the Company. However, please note that the sender will not receive a specific response in these cases.

Any requests or complaints regarding personal data collected by the Company should be submitted in writing to the Company using the contact information provided above. Please include the address of your residence / registered office or provide an alternate e-mail address if you would like to receive a reply at a different e-mail address than the one you used to send the request. The Company will provide you with the requested information either by post or email, using the address or e-mail address you have provided, within a reasonable timeframe.

Please note that in order to proceed with your request, we may require additional information from you to verify your identity. If you are submitting a request on behalf of someone else, we may also need to ask you for additional information to verify your authorization.

## **SOURCES FROM WHICH PERSONAL DATA IS COLLECTED**

Apart from information obtained directly from you through e-mail, phone, cell phone, web forms, and conversations in person, the Company may also obtain personal data from other sources.

This includes, for example, your fellow travellers, travel agencies that help you with your travel arrangements, online booking platforms, employment agencies, credit card providers and other contractual partners.

If we do not collect your data directly from you but from other individuals/entities mentioned above, we can only assume responsibility for how we handle your personal data from the moment we collect it. We cannot be held responsible for any actions taken by those from whom we have obtained it. Therefore, we kindly request that you review the privacy policies of any other entities to whom you provide your personal data.

By providing personal data to the Company, you guarantee that the information you have provided is accurate, that you have the necessary legal capacity and authority to share this information, and that you give your full consent to the Company to use and collect your information in accordance with regulations in force as well as terms and conditions of this Privacy Policy.

**1.** We collect your personal data directly from you in the following situations, for instance:

- when you make a reservation for accommodation, send us an e-mail or provide us with your personal data in any other manner;
- when you have any additional requests or complaints (communication with our staff, including the front desk, waiters, housekeeping, etc.);
- when you communicate with us through social networks or e-mail;
- during your stay in one of our facilities or by using our services;
- at check-in and check-out;
- when you make payments;
- when you make a reservation for a table at one of our restaurants and inform us about your preferences and any allergies you may have;
- when you leave your comments or complaints;
- when you provide us with your contact information for any reason.

**2.** We collect your personal data indirectly in the following situations, for instance:

- if another person makes a reservation for you;
- if information regarding you is provided to us by our business partner, agency, or intermediary via which you have arranged for our hotels to provide accommodation (e.g. travel agency, online booking platform such as Airbnb, booking.com, etc.);
- information obtained from payment service providers.

**3.** We may collect your personal data through automated systems, for purposes such as improving the service or ensuring security, for instance:

- When you use our website, we gather specific information about your usage of the site, including device data such as your IP address and browser types;
- At some facilities, we use electronic bracelets to track the usage of our services and monitor the number of visits. These bracelets are provided to you upon check-in;
- In order to ensure security and provide you with access to the free Internet, we collect specific information about your device when you connect to our network;
- For security purposes, we have surveillance cameras installed in the common areas available to our guests. These cameras may record your photo or video.

## **LEGAL BASIS FOR COLLECTION OF PERSONAL DATA**

The Company will collect and process your personal data only if one of the following conditions is met:

- **Consent**

When you have given us your consent. We typically refrain from using this legal basis unless it is explicitly provided for by law and/or other legal bases are not applicable. When data processing is dependent on consent, the data subject whose data is being processed has the right to withdraw their consent at any time without facing any negative consequences. Withdrawing consent does not impact the legality of processing that was based on consent prior to its withdrawal.

Example: receiving newsletters

If you want to subscribe to our newsletter, you will tick the box indicating your interest at the Company's website and then enter the email address where you would like to receive the newsletter.

- **Contract performance**

Data processing is required for the performance of a contract in which the data subject is a party or to take action at the data subject's request prior to contract conclusion.

Example: booking an accommodation

- **Compliance with legal requirements**

Data processing is necessary in order to comply with legal requirements. These requirements involve the collection and, in many cases, the delivery of data to government authorities.

Example: registration through e-visitor for the purpose of compliance with legal requirements

- **Legitimate interest**

Data processing is necessary for the legitimate interests of the data controller or a third party. In this situation, our legitimate interests to process your data take precedence over

your rights and freedoms. We will not use your personal data if we determine that doing so would harm your privacy and if our legitimate interest does not outweigh our obligation to protect your rights and freedoms. In such situations, the data subject always has the right to object to the processing.

Example: To ensure the protection of property and enhance security, we use of surveillance cameras to record specific areas within our facilities (e.g. front desk area)

The Company may also collect personal data for other reasons provided for by law, such as when processing is necessary to protect the vital interests of the data subject or other natural person.

## **TYPES OF PERSONAL DATA COLLECTED**

Personal data is any information that relates to an identified or identifiable natural person or other information that can lead to the identification of a particular person. The data we collect about you and process is determined by the nature, scope, and content of our relationship.

Here are some examples of personal data that we collect:

- **Identification information**

Name and last name, sex, date of birth, username, OIB (Tax No.) and information that may be present on your identity card or passport.

- **Contact information**

Address, e-mail address, telephone number, language information.

- **Financial information**

Payment information, account number and credit/debit card number

- **Transaction information**

Information about transactions (consumption of food and beverages, prices, use of spa and wellness services, time and place of service, etc)

- **Technical information**

The technical information we collect includes IP addresses, login data, location data, time zone, browser type and version, operating system, and other relevant information about the technology you use to access our website.

- **Usage information**

It includes information regarding your usage of our website, products, and services, including how and in what way you use them.

- **Marketing information**

It includes information about your preferred method of contact.

- **Preference information**

Information about your food and drink/beverage preferences

- **Special categories of personal data**

Special categories of personal data include personal data revealing racial or ethnic origin, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, data concerning your health, genetic and biometric data. We typically do not collect this specific type of data, nor data related to criminal offences. However, there are a few exceptional cases where we may collect such information.

- We collect and process your health data related to allergies if you have provided us with this information. This is done to fulfil the contract and in accordance with your explicit consent.;
- - In order to provide spa and wellness services, we collect health-related data as required by the contract and with your explicit consent.;
- In the case of organizing COVID-19 testing, in order to meet contractual obligations and safeguard public health.

**HOW YOUR PERSONAL DATA IS USED**

The Company will process the collected data for the purpose for which it was collected and/or for any purposes required by applicable legislation or legitimate interests arising from or related to the use of the Company's services and/or website, and the provision of requested services. We use consent as a legal basis rarely and in exceptional circumstances.

The Company may use specific types of your personal data for various purposes under different legal bases. These purposes and legal bases are outlined in the table below:

<b>Type of processing</b>	<b>Type of data</b>	<b>Legal basis for processing</b>
<b>Booking accommodation in our facilities</b>	Identification information, contact information, financial information	Contract performance, legitimate interest, compliance with legal requirements
<b>Responding to inquiries from guests and potential guests</b>	Identification information, contact information	Contract performance, legitimate interest

<b>Payment, collection, and refund</b>	Identification information, contact information, financial information, transaction information	Contract performance, legitimate interest, compliance with legal requirements
<b>Check-in and check-out of guests at our accommodation facilities (registration of guests at the front desk in our internal systems and other systems required by law such as e-Visitor)</b>	Identification information, contact information, preference information, marketing information	Contract performance, legitimate interest, compliance with legal requirements, consent
<b>Ensuring the safety, health, and protection of property. Security of property</b> (keys and cards, surveillance cameras)	Identification information	Legitimate interest (ensuring the safety of both property and individuals)
<b>Direct marketing</b> (contacting the guest by sending offers for similar services to their email address.)	Identification information, contact information, preference information, marketing information	Legitimate interest, consent
<b>Contracting and use of specific services during your stay at the facilities.</b> (excursions, restaurants, wellness, mini bar, TV, room service, etc)	Identification information, contact information, financial information, transaction information, preference information	Contract performance, legitimate interest, compliance with legal requirements, consent, consent (health data, allergy data, etc.)
<b>Complaints/requests, refunds, etc.</b>	Identification information, transaction information, preference information	Contract compliance, legitimate interest, compliance with legal requirements
<b>Surveys and satisfaction questionnaires</b>	Contact information	Consent

<b>Social networks communication</b> –	Identification information, contact information	Contract performance, legitimate interest (guest communication, managing guests' expectations, marketing strategy)
<b>Provision of Wi-Fi and/or Internet connectivity</b>	Technical information, usage information	Contract performance, legitimate interest (ensuring the security of the IT system)
<b>Compensation claims from guests, incident descriptions, and communication with third parties.</b>	Identification information, contact information	Contract performance, legitimate interest
<b>Website analytics monitoring (functionality enhancements, service optimization)</b>	Technical information, usage information	Legitimate interest
<b>Exchange services</b>	Identification information	Contract compliance, legitimate interest

**(COOKIES)**

When you visit and use our website, we collect cookies that store specific information about your usage and activities on our website. Cookies are small text files that contain a unique identifier and reference code. These files are saved by your web browser on your device. They allow us to recognise you when you visit our website again.

We do not use this data for identification purposes, and we also refrain from using third-party cookies for this purpose. We collect two types of cookies: ones that expire once you finish using our site, and others that have a longer duration. The purpose of the longer-lasting cookies is to recognise you when you revisit our site..

Our website uses cookies to enhance your browsing experience by remembering your preferences and allowing for a seamless experience during future visits. By selecting the "Accept All" option on the website form, you are indicating your agreement to the use of all

cookies. However, you have the option to visit "Cookie Settings" in order to provide specific consent regarding how your data is stored and used.

### **WHO CAN SEE THE DATA**

The Company does not sell, rent, or lend your personal data to any third parties. The Company may share data with trusted partners who are responsible for performing specific functions on our behalf, such as IT system maintenance and payment processing. We are legally obligated to share certain personal data with authorities, such as tax authorities, courts, etc.

We will only share your personal data with the recipients who require it to accomplish the intended goal, and only to the extent that is required. In doing so, we aim to ensure that all of our partners are legally obligated to maintain confidentiality. For instance, we are obligated by law to notify government authorities regarding your accommodation when you visit our hotels.

To provide a range of services, we collaborate with external partners who specialise in various areas. These services include transport coordination, organising excursions, renting cars and other vehicles, and arranging events on our premises. In some cases, we may also share relevant information with guests who will be attending these events. When you request us to provide a service, we may need to share your personal data with our partners to the degree required for them to deliver the requested service. For example, they may need to contact you, evaluate your compliance with travel regulations, or include you in special fare offers.

Below are the examples of the data we share with other recipients:

- In cases in which it is necessary to share your personal data to fulfil a contractual agreement in which you are involved;
- In cases in which you have given us consent to share your personal data with a third party (such as when using cookies);
- We may be required by law or regulation to share such information with judicial, tax, audit, and other competent authorities (for example, when we receive a request from the tax authorities or when there is an anticipated legal dispute);
- With payment service providers with whom we have entered into contracts for the processing of personal data;
- - With IT service providers with whom we have entered into appropriate data processing agreements and whose systems we use in our business
- With the e-Visitor system, in accordance the regulations regarding the provision of hotel accommodation services and the procedure for maintaining visitor lists and registrations;
- With other service providers, who provide a specific service on our behalf, including external consultants, investment advisory service providers, professional advisors such as auditors, lawyers or accountants, marketing agencies and market research agencies, technical support service providers and IT consultants who may be involved in tasks such as conducting tests or working on the development of technical solutions within our systems.



## **SECURITY OF YOUR PERSONAL DATA**

We are fully dedicated to protecting data from unauthorised access, disclosure, or deletion, regardless of its storage or processing location, as well as its stored format. The company relies on the services of trusted IT partners who are required to adhere to rigorous IT security standards.

The Company adheres to recognised information security standards, as follows:

- We implement risk-based technical and organisational security measures.;
- We minimise data exposure;
- We ensure that information is collected, stored, and processed correctly;
- When feasible and suitable, we employ pseudonymization and anonymization techniques to safeguard data;
- We evaluate technical and organisational security measures;
- We limit access to personal data to employees, contractors, and agents who are constrained by strict contractual confidentiality obligations and whose access to personal data is restricted and controlled by user assignments.

The company implements various measures to identify and address problems, as well as to minimise any potential damages.

In the event that the technical execution of the user-requested service necessitates the transfer of personal data outside the European Union and the European Economic Area, the Company shall undertake reasonable precautions to ensure that the recipients of said data, situated outside the EU, implement suitable safeguards for the data, in accordance with the provisions outlined in this Privacy Policy.

We will not contact you via email, text message, or mobile phone to request confidential personal information or credit card information. Do not respond to such a request if you receive it.

We take the security of your personal data seriously when you make online transactions on our website. We use appropriate technological measures to protect the information you share with us, such as encrypting your credit card number to ensure the security of the transaction. Regrettably, it is not possible for any security system or Internet data transmission system to provide a guarantee of absolute security against interception or unauthorised use of personal data.

To preserve your privacy, avoid sending credit card details or large volumes of personal information by e-mail.

## **RETENTION PERIOD OF PERSONAL DATA**

The period for which the Company retains personal data is restricted to the bare minimum and accordingly the Company shall prescribe retention periods or conduct periodic reviews of specific personal data to ensure that they are retained for no longer than is strictly required to accomplish the purpose for which they were initially collected.

Once the specified period has passed, the Company will delete personal data. However, if the data is required for creating statistical indicators, analysis, archiving, or any other legitimate interest of the Company, appropriate measures will be taken to anonymize them.

In accordance with the law, we are required to retain guest data for a minimum of two years following their stay, and the data stored in the e-Visitor system must be kept for a period of 10 years.

We retain data that is subject to accounting regulations for a period of 11 years. This refers to bills that may potentially contain your personal information as well.

We store credit card data used to guarantee reservations in our system for up to 30 days after your check-out. If we need to charge the amount of the guarantee, we store it in compliance with accounting regulations.

We keep the data we collect based on our legitimate interest in line with our reasonable business needs.

We keep video surveillance data for a maximum of 12 months, or longer if there are pending court proceedings or similar proceedings.

We keep the data we collect based on consent until the consent is withdrawn.

In certain circumstances, we may need to retain your personal data for a longer period of time than what was previously mentioned, if it is necessary to comply with legal requirements that apply to both parties.

At the end of the retention period, we will securely destroy any personal data that is printed on paper. This will be done through methods such as cutting or burning. Additionally, any data that is in electronic form will be permanently deleted in an irreversible manner.

## **HOW TO PROTECT YOUR RIGHTS**

You have the right to request a copy of all the personal data that we have collected from you. If you would like a copy of the other information we have collected from you, please feel free to write to us. In your message, kindly provide us with all the necessary details that will help us identify and locate your personal information. The Company offers free data delivery but reserves the right to charge a reasonable fee for special requests, such as multiple copies or a special format. We kindly request that you ensure the accuracy and currency of all the information you provide. If you happen to identify any inaccuracies in the information we have, we would greatly appreciate it if you could inform us promptly.

**You have the following rights:**

- right to access personal data i.e. the right to be informed about the processing of your data, including which data is being processed and the specific details of how it is being processed,
- right to erasure of personal data,
- right to restriction of processing,
- right to rectification of personal data,
- right to object to processing of personal data,
- right not to be subject to a decision based solely on automated processing, including profiling. We would like to clarify that we do not use this decision-making method. All decisions are made with significant human intervention.
- right to withdrawal of consent. If we process your data based on your consent, you have the right to withdraw your consent at any time. We will immediately cease processing any personal data that has been collected on the basis of this legal ground.
- right to object to competent authorities. In Croatia, it is the Personal Data Protection Agency, Selska cesta 136, 10 000 Zagreb, e-mail: azop@azop.hr. Tel: +385 (01) 4609-000, Fax; + 385 (01) 4609-099, E-mail: azop@azop.hr, Web: [www.azop.hr](http://www.azop.hr).

The ability to exercise the rights stated above is contingent upon the reason for and the basis on which they are processed. For instance, in the event that we are obligated by law to retain personal data for a specific period of time, we cannot delete it, notwithstanding your request.

We will promptly address your request and provide you with updates on the actions we have taken. If you have any additional questions regarding the processing of your personal data, please feel free to contact us.

Please note that we will be keeping a record of our communication in order to address any concerns or inquiries you may have in the most efficient manner.

### **CHANGES AND UPDATES TO THE PRIVACY POLICY**

This Privacy Policy supersedes all previous versions. The Privacy Policy was last updated in **October 2023**.

The Company reserves the right to change, modify, or amend this Privacy Policy at any time. Any modifications to the Privacy Policy will be posted on the Company's website. In the event of substantial changes, we will inform you in a clear and comprehensible manner.