



**City Park Center a.s., Bencúrova 10, 040 01 Košice, ID: 36 213 624
(operator of resort VILLA SANDY, Mestský park 7, 040 01 Košice)**

As the operator of the information system, you publish compliance with the principle of fairness and transparency towards the data subjects concerned in this statement on the protection of personal data under the name.

INFORMATION OBLIGATION OF THE OPERATOR

in accordance with Articles 13, 14 and the relevant Recitals of the Regulation of the European Parliament and the Council (EU) 2016/679 on the protection of natural persons in the processing of personal data and on the free movement of such data (hereinafter referred to as the "Regulation") and the Act of the National Council of Slovak Republic no. 18/2018 Coll. on the protection of personal data and on amendments to specific laws (hereinafter referred to as the "Act on Personal Data Protection")

The purposes of personal data processing are the reasons for which the personal data of data subjects (clients, guests, customers, applicants) are processed in our information systems on precisely determined legal bases. The purposes are specifically determined, explicitly stated and authorised. When processing the personal data of the data subjects, we comply with the principle of legality according to Articles 6 and 9 of the Regulation (individual purposes and legal bases are listed in the appendix of this Information Obligation).

Data subjects whose personal data are processed in our information systems for specifically defined purposes may exercise the following rights in writing or electronically:

- a) Right to access the personal data – it is the right to obtain confirmation of whether your data is being processed, as well as the right to get access to this data within the scope of the purposes and duration of the processing, the category of personal data concerned, the range of recipients, the procedure in each automatic processing, or the consequences of such processing. As an operator, we have the right to use all reasonable measures to verify the data subject's identity requesting access to the data, particularly in relation to online services and identifiers (Article 15, Recital 63, 64 of the Regulation). If the operator processes this data, it will issue a copy of this personal data to the data subject upon request. Issuance of the first copy is free of charge. For any additional copies requested by the person, the operator will charge a fee corresponding to the administrative costs incurred by issuing the copy. Suppose a person asks for information in the form of electronic means. In that case, it will be provided to him in a commonly used electronic format, e-mail, unless he requests another method.
- b) Right to rectify the incorrect personal data and supplement incomplete personal data (Article 16, Recital 65 of the Regulation). The operator will correct or supplement personal data without undue delay after the data subject has requested it.
- c) Right to erasure – „to be forgotten“ of those personal data that are no longer necessary for the purposes for which they were obtained and processed; in case of withdrawal of consent on the basis of which the processing is carried out; in case of illegal processing; if personal data were obtained in connection with the offer of an information company (persons under

16 years of age), subject to the fulfilment of the conditions specified in Article 17, Recital 65, 66 of the Regulation. The data subject will not have the right to delete personal data, provided that their processing is necessary for:

- to exercise the right to freedom of expression and information;
- to fulfil an obligation according to the law, a particular regulation or an international treaty to which the Slovak Republic is bound, or to fulfil a task carried out in the public interest or the exercise of public authority entrusted to the operator,
- for reasons of public interest in the field of public health,
- for the purposes of archiving in the public interest, for scientific or historical research or for statistical purposes, if it is likely that the right to erasure will make it impossible or seriously difficult to achieve the goals of such processing, or
- to demonstrate, exercise or defend legal claims

d) Right to restriction of processing is possible to apply as a data subject

- challenges the correctness of personal data and other details in accordance with Article 18, Recital 67 of the Regulation, in the form of the temporary transfer of selected personal data to another processing system, prevention of user access to selected personal data or temporary removal of processing
- the processing is illegal, and the data subject requests the restriction of their use instead of deletion of personal data
- the operator no longer needs personal data for the purposes of the processing, but the data subject requires them to prove, exercise or defend legal claims
- the data subject objected to the processing of personal data on the basis of the legitimate claim of the operator until it is verified whether the legitimate reasons on the part of the operator prevail over the legitimate reasons of the data subject.

Suppose the data subject requires the restriction of the processing of his data. In that case, the operator will not carry out any processing operations with the data concerned, except storage, without the data subject's consent.

e) Right to the accuracy of personal data is the right to transfer the personal data provided by you to our information systems on the basis of consent or performance of the contract to another operator in a structured, commonly used, and machine-readable format, as long as it is technically possible also under the conditions of Article 20, Recital 68 of the Regulation in case the processing is carried out by automated means. The exercise of this right does not affect Article 17 of the Regulation. The right to data portability does not apply to processing necessary to fulfil a task carried out in the public interest or the exercise of public authority entrusted to us as the operator.

f) Without prejudice to any other administrative or judicial means of redress, you as a data subject have the right to file a complaint with the Personal Data Protection Authority of the Slovak Republic in accordance with Article 77 of the Regulation if you believe that the processing of personal data concerning you is in violation with the Regulation or the Personal Data Protection Act.



As a data subject, you also have the right to object to the processing of your personal data at any time for reasons related to a specific situation, also if the processing is necessary for the purposes of legitimate interests pursued by us as an operator or a third party (except for processing carried out by public authorities in the performance of their tasks), with the exception of cases where such interests are overridden by your interests or fundamental rights and freedoms as a data subject that require the protection of personal data (in particular if the data subject is a child).

City Park Center a.s., so sídlom Bencúrova 10, 040 01 Košice, IČO: 36 213 624, adopted as the operator of the information system all appropriate personnel, organisational and technical measures for the purpose of maximum protection of your personal data to reduce the risk of their misuse, leakage and so forth, to the greatest extent possible. In accordance with our obligation arising from Article 34 of the Regulation, we inform you as data subjects that if a situation arises that we, as the operator, violate the protection of your personal data in a way that is likely to lead to a high risk for the rights and freedoms of natural persons, we will notify you of this fact without undue delay.

WARNING: to comply with the principle of minimisation, all personal data provided by you is a necessary legal or contractual requirement to fulfil the purpose of their processing. Failure to provide mandatory data essential for concluding a contract may result in failure to complete a contractual relationship.

In case of any questions related to the protection of your personal data, including the exercise of your rights in accordance with the Regulation and the Act on the Protection of Personal Data, please get in touch with us:

E-mail address: gdpr@villasandyresort.com

If you are not satisfied with our answer, or if you believe that we process your personal data unfairly or illegally, you can file a complaint with the supervisory authority, which is the Personal Data Protection Office of the Slovak Republic, <https://dataprotection.gov.sk>, Hraničná 12 , 820 07 Bratislava 27; tel. number: +421 /2/ 3231 3214; E-mail: statny.dozor@pdp.gov.sk.

The operator processes personal data for these purposes:

1. RECORD OF ACCOMMODATED GUESTS IN THE ACCOMMODATION FACILITY

The purpose of personal data processing	They are keeping a database of guests staying in the accommodation facility with the aim of checking them when moving around the accommodation facility, when they are checked out, paying local taxes and fees, and reporting to the relevant authorities.
Legal basis	The legal basis for the processing of personal data in the subject Information System is represented by Act no. 404/2011 Coll. on the residence of foreigners and the amendment of specific laws, Act no. 253/1998 Coll. on reporting the residence of citizens of the Slovak Republic and the register of residents of the Slovak Republic, Act no. 40/1964 Coll. Civil Code as amended by later regulations
Categories of recipients	Bodies of state administration, public authorities and public administration according to relevant legislation
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	Ten years since the date of accommodation
Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	Accommodated guests
Categories of personal data	Name, surname, identity card number or travel document number, address of permanent residence, length of stay, for foreigners' nationality and date of birth
The source from which the personal data originates	Personal data concerning the data subject can be obtained from the following source: booking via the website www.booking.com

2. TABLE RESERVATIONS ON RESTAURANT PREMISES

The purpose of personal data processing	Provision of restaurant and hospitality services on the basis of table reservation through the online reservation on the website or by telephone.
<u>Legal basis</u>	The legal basis for processing personal data in the subject Information System is represented by Act no. 513/1991 Coll. Commercial Code, Act no. 40/1964 Coll. Civil Code, Act no. 455/1991 Coll. on business activities, the Constitution of the Slovak Republic
Categories of recipients	Bodies of public authorities according to the relevant legal regulations (court, law enforcement authorities and misdemeanour authorities)
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	One day from the day following the day the reservation was made
Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	Natural persons – customers
Categories of personal data	Name, surname, telephone number

3. CAMERA SYSTEM MONITORING PREMISES ACCESSIBLE TO THE PUBLIC

The purpose of personal data processing	Monitoring of premises accessible to the public for the purpose of property protection, health and crime detection.
Legal basis	The legitimate interest within the meaning of Article 6 paragraph 1 letter f) Regulations. The primary legitimate interest is property protection and the safety of the operator and the data subjects.
Categories of recipients	Bodies of public authorities according to the relevant legal regulations (court, law enforcement authorities and misdemeanour authorities)
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	Three days from the day following the day on which the recording was made

Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	Natural persons who entered the monitored area
Categories of personal data	The likeness of a natural person, one's image, data that can be used to identify the person, type and license plate of the vehicle

4. PROCESSING COMPLAINTS

The purpose of personal data processing	Processing of complaints for services and goods provided.
Legal basis	The legal basis for processing personal data in the subject Information System is represented by Act no. 250/2007 Coll. on consumer protection.
Categories of recipients	None
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	Six months from the day the claim was processed
Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	Accommodated guests, visitors of business premises, restaurant customers
Categories of personal data	Name, surname, identity card number or travel document number, address of permanent residence, length of stay, and for foreigners, nationality and date of birth

5. APPLICATION OF RIGHTS OF DATA SUBJECTS

The purpose of personal data processing	Processing requests from natural persons to exercise their rights as data subjects per Regulation (EU) 2016/679 of the European Parliament and the Council on the protection of natural persons in the processing of personal data and on the free movement of such data.
Legal basis	Article 6 paragraph 1 letter c), in accordance with Articles 15 to 22 and 34 of Regulation (EU) 2016/679 of the European Parliament and the Council on the protection of natural persons in the processing of personal data and on the free movement of such data.

Categories of recipients	Bodies of state administration, public authorities and public administration according to relevant legal regulations
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	One year from the date of processing the application
Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	A natural person who, as a data subject, within the scope of the purposes defined by the operator, turns to the operator with a request to exercise his rights
Categories of personal data	Personal data related to the processing of applications by which the data subjects have exercised their rights, in particular, the title, name, surname, address, signature and other personal data to which the applied right of the data subject applies.

6. CONTRACTUAL RELATIONS

The purpose of personal data processing	Within the subject Information System, the personal data of a natural person as one of the contracting parties is processed. Contractual relations in the Information System are used to prepare and conclude contractual relations for providing accommodation and related services.
Legal basis	The Constitution of the Slovak Republic, SNR (Slovak National Council) Act No. 513/1991 Coll. Commercial Code, SNR (Slovak National Council) Act No. 40/1964 Coll. Civil Code
Categories of recipients	None
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	Five years from the completion of the contract
Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	Contracting party – natural person

Categories of personal data	Personal data to the extent necessary, in a particular title, name, surname, date of birth, permanent residence / temporary residence, phone number, e-mail, bank account number, signature, and address.
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7. PROMOTION OF THE OPERATOR

The purpose of personal data processing	Promotion of the operator, publication of information about the operator's activities (e.g., about organised events, etc.) to build its good name. Promotion takes place on the operator's website, the intranet and also on the internal premises of the operator.
Legal basis	The data subject's consent pursuant to Article 6, paragraph 1 letter a) Regulations and the Act on the Protection of Personal Data, while the data subject has the right to withdraw his consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
Categories of recipients	None
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	30 days from the withdrawal of consent
Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	Employees of the operator accommodated guests, restaurant customers, and persons involved
Categories of personal data	Personal data to the extent necessary, in particular, title, name, surname, function/job title, photo, video and other personal data in order to achieve the purpose of processing

8. MARKETING

The purpose of personal data processing	The purpose of processing personal data is to send marketing offers via e-mail/newsletter (e.g., about promotional stays, etc.)
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Legal basis	<p>The legitimate interest within the meaning of Article 6 paragraph 1 letter f) Regulations.</p> <p>The data subject's consent under Article 6, paragraph 1 letter a) Regulations and the Act on the Protection of Personal Data, while the data subject has the right to withdraw his consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.</p>
Categories of recipients	Intermediaries - mainly marketing and advertising agencies, software/IT service providers
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	30 days from the withdrawal of consent
Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	Natural persons - accommodated guests, potential guests, and customers.
Categories of personal data	Name, surname, e-mail address

9. ECONOMICS, ACCOUNTING DOCUMENTS

The purpose of personal data processing	Economic agenda and processing of accounting documents, in particular - contracts, orders, processing of incoming invoices and invoicing to customers (guests).
Legal basis	<p>The legal basis for processing personal data in the subject Information System is represented by Act no. 460/1992 Coll. The Constitution of the Slovak Republic, as amended, Act No. 513/1991 Coll. Commercial Code as amended, Act NR SR (National Council of the SR) no. 431/2002 Coll. on accounting, as amended, Act no. 222/2004 Coll. on value added tax as amended, the Personal Data Protection Act and related legal regulations as amended, Act No. 145/1995 Coll. on administrative fees, as amended, by the Act of the NR SR (National Council of the SR) no. 595/2003 Coll. on income tax, as amended, by Act NR SR (National Council of the SR) no. 461/2003 Coll. on social insurance, as amended, by Act of the NR SR (National Council of the SR) no. 563/2009 Coll. on tax administration (Tax Code), as amended, Act no. 40/1964 Coll. Civil Code as amended, Act No. 311/2001 Coll. Labour Code as amended</p>

Categories of recipients	According to relevant legal regulations, the bodies of state administration, public authorities and public administration. Intermediary – a contractual partner who ensures the accounting agenda for the operator
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	Ten years
Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	<ul style="list-style-type: none"> - Natural persons - potential guests, accommodated guests - employees of suppliers and customers, - representatives of suppliers and customers - intermediary - contractual partner of the operator who ensures the accounting agenda - restaurant customers
Categories of personal data	Personal data related to the management of accounting documents, in particular, title, name, surname, address of permanent residence, address of temporary residence, telephone number, e-mail address, date of birth, social security number, type and number of an identity document, signature, account number.

10. LEGAL RELATIONS AND DEBT RECOVERY

The purpose of personal data processing	We are ensuring management of the legal agenda (e.g., first-instance proceedings, settlement of remedies, settlement of court disputes, representation in legal matters, application of decisions on compensation for damages, recovery of compensation for damages, application of contractual obligations, drafting of measures with organizational-legal impact, etc.).
Legal basis	The legal basis for personal data processing is Act no. 460/1992 Coll. The Constitution of the Slovak Republic, as amended, Act No. 40/1964 Coll. Civil Code, as amended, Act No. 99/1963 Coll. the Code of Civil Procedure, Act NR SR (National Council of the SR) No. 300/2005 Coll. Criminal Code, Act NR SR (National Council of the SR) no. 301/2005 Coll. Criminal Procedure, Act NR SR (National Council of the SR) No. 71/1967 Administrative Procedure, Act No. 233/1995 Coll. on court bailiffs and enforcement activities (the Enforcement Code) and on amendments and additions to specific laws and the amendments and supplements to the particular regulations, as amended, Law of the NR SR (National Council of the SR) No. 153/2001 Coll. on the Public Prosecutor's Office, as amended, Act of the NR SR (National Council of the SR) No. 372/1990 Coll. on Offenses as amended, Act no. 586/2003 Coll. on Advocacy and Amendments to Act No. 455/1991 Coll. on trade (Trade Act) as amended, the Personal Data Protection Act and related legal regulations as amended. Act of the NR SR (National Council of the SR) no. 311/2001 Coll. Labour Code as amended.
Categories of recipients	<ul style="list-style-type: none"> - courts - executor offices, - bodies of state authorities, public authorities and public administration according to relevant legal regulations
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	Ten years
Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	<ul style="list-style-type: none"> - accommodated guests – debtors, - restaurant customers - debtors, - counterparts in disputes, - other natural persons in the position of participants in the proceedings

Categories of personal data	Personal data related to handling disputes, in particular name, surname, address of permanent residence or residence, date of birth or other identification data, telephone number, and e-mail address.
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11. COMPLAINTS

The purpose of personal data processing	Dealing with complaints, i.e., carrying out procedures for their submission, registration, reception, investigation and written notification of the result of the investigation of complaints or review of complaints.
Legal basis	Law no. 9/2010 Coll. Of Laws on administrative complaints as amended
Categories of recipients	The complainant and other natural persons to whom the complaint relates
Cross-border transfer of personal data	Not carried out
Time limits for erasure of personal data	Six months from the date of handling the complaint
Information about the existence of automated decision-making, including profiling	Not carried out
Categories of data subjects	<ul style="list-style-type: none"> - Natural persons – complainant, - The person to whom the complaint relates, - other natural persons whose personal data are necessary for handling complaints

<p>Category of personal data</p>	<p>Personal data related to the handling and investigation of complaints, in particular the name, surname, address of permanent or temporary residence of the complainant, the address of the complainant for delivery in electronic form, other personal data found or submitted during the handling of the complaint and which are necessary to achieve the purpose of processing.</p> <p>Special Categories of personal data according to Art. 9 par. One of Regulation No. 2016/679 (GDPR) or § 16 par. 1 of Act no. 18/2018 Coll. on the protection of personal data may be subject to processing if they are the subject of a complaint or discovered during the handling of a complaint</p> <p>Personal data related to the recognition of guilt for criminal acts or misdemeanours according to Art. 10 of Regulation no. 2016/679 (GDPR) or § 17 of Act no. 18/2018 Coll. on the protection of personal data may be subject to processing if they are the subject of a complaint or discovered during the handling of a complaint.</p>
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