

## PRIVACY POLICY OF THE VILLA PARK HOTEL IN SIEDLCE

### §1

#### General provisions and data of the Personal Data Administrator

1. This Privacy Policy of the VILLA PARK Hotel ("**Privacy Policy**") defines the principles of processing and protection of personal data provided by users ("**Users**") in connection with the use by Users of the website at: <https://hotel.siedlce.pl/pl/start> ("**Website**"), as well as the principles of processing and protection of personal data of Guests of the VILLA PARK Hotel ("**Hotel**") and other persons staying in the Hotel building or around the Hotel building, in the area covered by monitoring.
2. The administrator of the personal data of Users, as well as Hotel Guests and other persons staying on the premises of the Hotel building or around the Hotel building in the area covered by monitoring ("**Personal Data**") is Robert Stańczuk, conducting business activity under the name: Firma Handlowo-Ustugowa "ROBSON", entered into the Central Register and Information on Business Activity (CEIDG), with its registered office in Siedlce, address: ul. Nauczycielska 12, 08-110 Siedlce, NIP: 8211727973, REGON: 710463176 ("**Administrator**").
3. The Hotel should be understood as a facility for restaurant and hotel purposes located in Siedlce at ul. Nauczycielska 12, 08-110 Siedlce. The Hotel is run by the Administrator.
4. In matters concerning the processing and protection of Personal Data, you can contact the Administrator via e-mail at the following address: [villapark@hotel.siedlce.pl](mailto:villapark@hotel.siedlce.pl) or in writing to the following address: Hotel Villa Park in Siedlce, ul. Nauczycielska 12, 08-110 Siedlce.

### §2

#### Method of processing Personal Data

1. In order to ensure the security of the entrusted personal data, the Administrator operates on the basis of internal procedures and recommendations, in accordance with the relevant legal acts in the field of personal data protection, in particular with 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 ("**RODO**").
2. The Administrator shall exercise due diligence to protect the interests of data subjects, in particular ensuring that Personal Data is:
  - (a) processed in accordance with the law, reliably and transparently for the data subject ("lawfulness, reliability and transparency"),

(b) collected for specific, explicit and lawful purposes and not subject to further processing incompatible with these purposes ("purpose limitation"),

(c) substantively correct and adequate in relation to the purposes for which it is processed ("data minimization", "data accuracy"),

(d) stored in a form which enables the identification of the data subject for a period no longer than is necessary for the purposes for which the data is processed ("storage limitation").

3. The Administrator collects Personal Data in the following situations:

(a) The User or the Hotel Guest provides the Administrator with their Personal Data, e.g. by filling out a contact form, reservation form, residence card, expressing consent to receive commercial information to the e-mail address, using the services provided by the Administrator by telephone, as well as by electronic correspondence, including e-mail and traditional mail addressed to the Administrator,

(b) The Personal Data of the Hotel Guest are transferred to the Administrator by the operator of an external booking portal, in the case of bookings of stays at the Hotel made via external booking portals,

(c) use of cookies.

4. The Personal Data of minors (children) are collected only from their parents or legal guardians in order to determine their age and the discounts they are entitled to, and for statistical purposes. The data is collected when making a reservation and when registering a stay at the Hotel.

### **§3**

#### **Purposes and legal basis of processing Personal Data**

1. The Administrator processes Personal Data to provide services in accordance with the scope of its business activity, always in accordance with the law, i.e. for the purpose of:

1) accepting a reservation for a stay at the Hotel and registering a stay at the Hotel;

2) handling an inquiry sent via the contact form or directly by electronic means;

3) accepting an offer/placing an order via the contact form or directly by electronic means;

4) proper performance of the room rental agreement together with accompanying services at the Hotel, as well as providing other services offered by the Administrator;

5) consideration of complaints - in accordance with the content *art. 6 ust. 1 lit. f RODO*, i.e. processing is necessary to conclude and perform the agreement;

6) ensuring security, protection of information and property, determining, defending against claims or pursuing claims, including through video monitoring on the Hotel premises. In selected locations on the Hotel premises, including the car park, reception, corridors, video monitoring is used using surveillance cameras. The area covered by monitoring is additionally marked with a graphic sign along with written information - in accordance with the content of *art. 6 ust. 1 lit. f RODO*, i.e. processing is necessary for purposes arising from legally justified interests pursued by the Administrator (in this case, the interest of the Administrator is: protection of the vital interests of Hotel Guests and persons staying on the premises of the Hotel and possession of personal data that will allow to establish, pursue or defend against claims, including customers and third parties);

7) responding to received electronic or traditional correspondence - in accordance with the content of *art. 6 ust. 1 lit. f RODO*, i.e. processing is necessary for purposes arising from legally justified interests pursued by the Administrator;

8) Possession of archival evidence in accordance with the content of *art. 6 ust. 1 lit. f RODO*, i.e. processing is necessary for purposes arising from legally justified interests pursued by the Administrator;

9) establishing, pursuing or defending against claims - in accordance with the content of *art. 6 ust. 1 lit. f RODO*, i.e. processing is necessary for the purposes resulting from the legitimate interests pursued by the Administrator;

10) Issuing an invoice, bill and fulfilling other obligations resulting from the provisions of tax law - in accordance with the content of *art. 6 ust. 1 lit. f RODO* in connection with the regulations contained in the Act of 29 September 1994 on accounting.

#### **S4**

**Requirement to provide Personal Data Providing Personal Data is voluntary, however, in some cases, providing certain Personal Data is necessary to use the services provided by the Administrator, which applies to the following situations:**

1) in the case of booking a stay in a Hotel made via the booking system available on the Website, providing Personal Data is necessary to conclude and perform the contract with the Administrator,

2) in the case of an inquiry sent to the Administrator electronically, by phone, including via the contact form or via e-mail, traditional mail, providing Personal Data is necessary for the Administrator to respond,

3) in the case of expressing consent to receive commercial information, providing Personal Data is necessary to receive commercial information from the Administrator and is related to expressing consent to receive commercial information from the Administrator,

4) in the case of wishing to receive an invoice for goods or services provided by the Administrator, the obligation to provide Personal Data and their scope results from tax regulations; failure to provide this Personal Data will prevent the issuance of an invoice.

## **§5**

### **Consent to the processing of Personal Data**

1. If the processing of Personal Data is based on consent, the person who expressed this consent may withdraw it at any time - at their own discretion. To do this, send a statement of withdrawal of consent to the processing of their Personal Data via e-mail to the following address: villapark@hotel.siedlce.pl or in writing to the following address: Hotel Villa Park in Siedlce, ul. Nauczycielska 12, 08-110 Siedlce.

2. Withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

## **§6**

### **Other methods of processing Personal Data**

The Administrator, as part of the processing of Personal Data, does not make automated decisions, including based on profiling. The Administrator does not automatically collect any information and Personal Data via the Website, except for those contained in cookies.

## **§7**

### **Recipients of Personal Data**

The Administrator entrusts the performance of certain services to its service providers — recipients of Personal Data. For this reason, it may share Personal Data to the extent necessary to perform a given service, in particular to the following recipients of Personal Data:

- 1) entities supporting the Administrator in providing services electronically, e.g. providing payment services,
- 2) entities supporting the Administrator in marketing or advertising campaigns,
- 3) providers of IT services, hosting,
- 4) providers of legal, accounting, advisory and support services for the Administrator in pursuing claims,
- 5) entities providing postal and courier services, the Administrator's insurer,
- 6) external booking portals, if the Guest has booked a stay at the Hotel through an external booking portal,

7) public authorities, if required by applicable law. 2. Furthermore, the Administrator ensures that the transfer of Personal Data to other entities does not affect the security of this data. The Administrator shall make every effort to ensure that the recipients of Personal Data ensure an appropriate standard of protection and maintain confidentiality.

## **§8**

### **Period of processing Personal Data**

1. The Administrator processes Personal Data only for a period that is justified by the purpose for which the Personal Data was collected and as permitted by law.

2. The Administrator processes Personal Data for the period of:

a) until the expiry of the limitation period for any claims related to the performance of the contract concluded with the Administrator,

b) until the expiry of the obligation to store data resulting from the provisions of law - in the case of Personal Data processed in order to fulfill a legal obligation incumbent on the Administrator, for the duration of the legitimate interests of the Administrator or until an objection is filed, unless another basis for processing occurs - in the case of Personal Data processed in order to fulfill the legitimate interests of the Administrator,

c) until the withdrawal of consent or the fulfillment of the purpose to which the consent related - in the case of processing Personal Data on the basis of granted consent,

d) 7 days - in the case of Personal Data recorded by video surveillance cameras in the event that the surveillance recordings constitute evidence in proceedings conducted on the basis of law or may constitute evidence in the proceedings, these recordings will be stored until the final conclusion of the proceedings. Any requests, comments or complaints can be submitted to the Hotel reception desk directly or by phone at 25 632 30 03, or by e-mail to: villapark@hotel.siedlce.pl or in writing to: Hotel Villa Park in Siedlce, ul. Nauczycielska 12, 08-110 Siedlce.

## **§9**

### **Rights of entities sharing data**

1. Every person whose Personal Data is processed has the right to:

1) access their Personal Data,

2) supplement, transfer, correct and rectify their Personal Data,

3) delete their Personal Data,

4) limit the processing of their Personal Data,

5) object to the processing of their Personal Data,

6) withdraw consent if the processing of Personal Data is based on consent.

2. In the event of a breach by the Administrator of the provisions on the protection of personal data, the data subject may file a complaint regarding the processing of their Personal Data to the President of the Personal Data Protection Office. The complaint may be filed in person at the office of the President of the aforementioned Office at ul. Stawki 2, 00-986 Warsaw or sent to the address of the office of the President of the Personal Data Protection Office, indicated above.

3. A person who would like to exercise their rights listed above may contact the Administrator by e-mail at the following address: villapark@hotel.siedlce.pl or by writing to the following address: Hotel Villa Park in Siedlce, ul. Nauczycielska 12, 08-110 Siedlce.

4. The Administrator will provide the data subject with information on the actions taken in connection with the request received without undue delay - and in any case within one month of receiving the request (with the possibility of extending the deadline by another two months due to the complex nature of the request or a large number of requests - which requires notification of such extension of the deadline, stating the reasons for the delay). If the data subject has submitted their request electronically, the Administrator will, to the extent possible, also provide the information electronically, unless the data subject has requested a different form.

5. If the Administrator does not take action in connection with the received request of the data subject, it will immediately - no later than within one month of receiving the request - inform about the reasons for not taking action and the possibility of filing a complaint with the supervisory authority and using legal remedies in court.

6. The exercise of the rights of the data subject is free of charge, unless the data subject's requests are clearly unjustified or excessive (in particular due to their ongoing nature). In such a case, the Administrator may charge a reasonable fee, taking into account the administrative costs of providing information, conducting communication or taking the requested actions, or refuse to take action in connection with the request. The Administrator is then obliged to prove that the data subject's request is clearly unjustified or excessive.

## **§10**

### **Information about cookies**

1. Cookies (so-called "cookies") are computer data, in particular text files, which are stored on the User's device and are intended for using the Website. Cookies usually contain the name of the website from which they originate, the time of their storage on the end device and a unique number.

2. Upon the first visit to the Hotel's website, the User is informed about the use of cookies. By remaining on the website, the user accepts the use of regular cookies on the Website.

Failure to change browser settings on the User's side is tantamount to consenting to the use of "cookies".

3. The installation of "cookies" is necessary for the Hotel to properly provide services. "Cookies" files contain information necessary for the proper functioning of the website, in particular those requiring authorization. The User may change the settings of their browser at any time so that cookies are either accepted or rejected or so that the User is notified not to place these files on their computer.

4. As part of the Website, due to the storage period, two basic types of cookies are used: "session cookies" and "persistent cookies":

1) "session" cookies are temporary files that are stored on the User's end device until logging out, leaving the Website or disabling the software (internet browser),

2) "persistent" cookies are stored on the User's end device for the time specified in the cookie parameters or until they are deleted by the User.

5. The following types of cookies are used as part of the Website:

1) "essential" cookies, enabling the use of services available on the Website, e.g. authentication cookies used for services requiring authentication within the Website and used to ensure security, e.g. used to detect abuses in the scope of authentication within the Website,

2) "analytical" cookies, enabling the collection of information on the manner of using the Website by the User in order to optimize its functioning and adapt it to the User's expectations,

3) "marketing" cookies, enabling the provision of marketing content to the User more tailored to their interests and sending them notifications about marketing offers corresponding to their interests.

6. If cookies are not necessary to ensure the proper functioning of the Website and the implementation of its basic functions, i.e. providing the User with a service provided electronically, when the legal basis on which cookies are used is a provision of law - art. 173 sec. 3 item 2 of the Act of 16 July 2004 - Telecommunications Law, obtaining and storing information using cookies is possible only on the basis of the User's consent. The User is asked to express the appropriate consent and select the scope of use of cookies during the first visit to the Website from the level of the cookie banner, which appears in a visible and easily accessible place. To the extent that cookies contain the User's Personal Data, the basis for their processing is the legitimate interest of the Administrator (*art. 6 ust. 1 lit. f RODO*).

7. The User may at any time change the selected scope of use of cookies in the "Settings" on the Website and withdraw the previously expressed consent (with the reservation that

some parts of the Website may then not function properly) - however, this will not affect the legality of actions taken on the basis of consent before its withdrawal and conducting communication to which the User has given additional consent. The use of individual types of cookies may also be blocked from the level of web browsers.

## **§11**

### **Copyright**

All content and information contained on our website, including in particular graphic signs, data, texts, photos, graphics, films, or other materials are the property of Robert Stańczuk, conducting business under the name of Firma Handlowo-Uslugowa "ROBSON" and are protected in accordance with the Act of 4 February 1994 on copyright and related rights in the scope of use, display, copying, transfer, distribution, modification or deletion. In connection with the above, all actions in the indicated scope, undertaken without prior written consent are illegal and will constitute an infringement of intellectual property.

## **§12**

### **Final provisions**

1. The privacy policy is available on the Website at: <https://hotel.siedlce.pl> and at the Hotel reception.
2. The Administrator reserves the right to make changes to the Privacy Policy, especially in the case of development of Internet technology, possible changes in legal regulations having a direct impact on the content of the Privacy Policy or in order to improve the operation of the Website. The Administrator will inform about the content of changes to the Privacy Policy and the date of their entry into force each time by posting in a visible manner on the Website information about the change to the Privacy Policy containing a summary of changes. Changes to the Privacy Policy enter into force on the date provided together with the information about the change.