

# PRIVACY POLICY

## FOR THE ZDROJOWAHOTELS.PL WEBSITE

dated 3 July 2026

This Privacy Policy describes the principles governing the processing of personal data of individuals using the zdrojowahotels.pl website, the forms available on the website, reservation systems, communication channels, and Zdrojowa Hotels' social media profiles.

This document also provides general information on the use of cookies and similar technologies.

Detailed and up-to-date information regarding the cookies used on the Website is available in the [Cookie Declaration](#) published on the Website.

### 1. Definitions

- **Controller / Zdrojowa Hotels / we** - means the owner of the website available at zdrojowahotels.pl, namely Zdrojowa Hotels Sp. z o.o., with its registered office in Kołobrzeg, ul. Antoniego Sułkowskiego 9, 78-100 Kołobrzeg, Poland, entered into the Register of Entrepreneurs maintained by the District Court in Koszalin, 9th Commercial Division of the National Court Register under KRS No. 0000296672, share capital PLN 22,500,000, REGON: 320441334, NIP (Tax Identification Number): 671 1756876.
- **Website** - means the website available at zdrojowahotels.pl, together with all its subpages, forms, booking modules, informational content and functionalities made available to users.
- **User / You** - means any person visiting the Website, using its forms, making reservations, contacting us, subscribing to marketing communications, using services available through the Website, or interacting with Zdrojowa Hotels' social media profiles.
- **Personal Data** - means any information relating to an identified or identifiable natural person, including information that allows you to be identified directly or indirectly, in particular by reference to identifiers such as your name, identification number, location data or online identifier.
- **Services** - means the functionalities available through the Website, including, for example, making hotel reservations or creating a user account. Certain Services are available only to registered account holders.
- **Property** - means a hotel, apartment, apartment complex, water park, restaurant, bar, club, spa or wellness area, treatment room, conference facility, recreational facility, or any other property

or service point presented on the Website or connected with the offer of Zdrojowa Hotels or companies belonging to the Zdrojowa Group.

- **Zdrojowa Group / Group Companies** - means Zdrojowa Hotels together with entities affiliated through organisational, capital or operational links, the current list of which is available on the Website under the "[Zdrojowa Group Companies](#)" section.
- **GDPR** - means 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).
- **Cookies** - means cookies and similar technologies stored on the user's device or enabling access to information stored on that device, including online identifiers, pixels, tags and analytical or marketing scripts.
- **Zdrojowa Hotels Social Media Profiles** - means the pages, accounts and channels operated by Zdrojowa Hotels on social media platforms such as Facebook, Instagram, YouTube and X (formerly Twitter).
- **Privacy Policy** - means this document.

## 2. Who is the Controller of Your Personal Data?

2.1. The Controller of your Personal Data is Zdrojowa Hotels Sp. z o.o., with its registered office in Kołobrzeg, ul. Antoniego Sułkowskiego 9, 78-100 Kołobrzeg, Poland, entered into the Register of Entrepreneurs maintained by the District Court in Koszalin, 9th Commercial Division of the National Court Register under KRS No. 0000296672, share capital PLN 22,500,000, REGON: 320441334, NIP (Tax Identification Number): 6711756876.

E-mail: [sekretariat@zdrojowahotels.pl](mailto:sekretariat@zdrojowahotels.pl)

2.2. To ensure the security of your Personal Data, we have appointed a Data Protection Officer (DPO), who can be contacted at:

[iod@zdrojowainvest.pl](mailto:iod@zdrojowainvest.pl)

Alternatively, you may contact the DPO by post at our registered office. Please mark your correspondence with "Data Protection Officer".

2.3. Zdrojowa Hotels implements appropriate technical and organisational measures to ensure the security of Personal Data processed by us, in accordance with applicable legal requirements.

2.4. Every employee and contractor authorised to process Personal Data is bound by confidentiality obligations before being granted access to such data. These obligations also cover all information concerning the security measures implemented to protect Personal Data.

2.5. Where you make a reservation, purchase or use services provided by a specific Property, the controller responsible for the processing of your Personal Data to the extent necessary for providing that service may also be the relevant Property operator or another entity belonging to the Zdrojowa Group.

This applies in particular where the service is actually provided by an entity other than Zdrojowa Hotels Sp. z o.o.

Information identifying the relevant controller may be included in the booking terms and conditions, reservation confirmation, accounting documents, or information provided at the Property.

### 3. For What Purposes Do We Process Your Personal Data?

Below we describe the main situations in which we process your Personal Data. The scope of the data processed depends on the functionality you use and the information you choose to provide to us.

Purpose	Examples of Personal Data	Legal Basis	Retention Period
<b>Handling enquiries and pre-booking communication</b>	Name and surname, contact details, enquiry content, stay preferences, technical communication data	Article 6(1)(b) GDPR – taking steps prior to entering into a contract; Article 6(1)(f) GDPR – legitimate interest consisting in handling correspondence and managing customer relations	For the period necessary to respond to the enquiry and thereafter for the period required to establish, exercise or defend legal claims or to document the correspondence
<b>Processing and fulfilling reservations</b>	Identification and contact details, stay details, number of guests, preferences,	Article 6(1)(b) GDPR – performance of a contract; Article 6(1)(c) GDPR – compliance with legal obligations,	For the duration of the contract and thereafter for the periods required under

	payment information, booking history	including accounting and tax obligations	tax, accounting and limitation regulations
<b>Payment processing</b>	Data necessary to identify the transaction, payment data processed by the payment service provider, transaction identifier, payment status	Article 6(1)(b) GDPR – processing payments; Article 6(1)(c) GDPR – compliance with accounting and tax obligations	For the period necessary to process and settle the payment and for the period required by applicable law
<b>Handling complaints, claims and customer requests</b>	Identification and contact details, service-related information, complaint content, case documentation	Article 6(1)(f) GDPR – legitimate interest consisting in establishing, exercising or defending legal claims and handling complaints; in certain cases Article 6(1)(c) GDPR	For the duration of the complaint handling process and thereafter until the expiry of limitation periods or mandatory archiving requirements
<b>Direct marketing by Zdrojowa Hotels</b>	E-mail address, telephone number, name, preferences, activity history, marketing consents, communication interaction data	Article 6(1)(f) GDPR – legitimate interest consisting in direct marketing; where required by applicable law, electronic or telephone marketing communications are sent only on the basis of your consent	Until you object to direct marketing or withdraw your consent for the relevant communication channel

<p><b>Marketing of offers from Zdrojowa Group Companies</b></p>	<p>Contact details, marketing consents, preferences, communication activity data</p>	<p>Article 6(1)(f) GDPR or Article 6(1)(a) GDPR, depending on the subscription model and the scope of the consent; where required, electronic and telephone communications are based on the appropriate consent</p>	<p>Until you object to processing or withdraw your consent; where Personal Data are transferred to another Group Company, retention is governed by that company's privacy information</p>
<p><b>Marketing automation, personalisation and communication segmentation</b></p>	<p>Online identifiers, Website activity, click history, e-mail open rates, preferences, marketing segment</p>	<p>Article 6(1)(f) GDPR – legitimate interest consisting in tailoring communications and assessing marketing effectiveness; where cookies or similar technologies are involved, consent collected through the Consent Management Platform (CMP), where required</p>	<p>Until you object, withdraw your consent or for the lifetime of the relevant cookie specified in the Cookie Declaration</p>
<p><b>Analytics, statistics and Website development</b></p>	<p>Online identifiers, IP address, device and browser information, Website activity, traffic source, statistical data</p>	<p>Article 6(1)(f) GDPR – legitimate interest consisting in analysing Website usage and improving its functionality; where analytical cookies are used, consent where required</p>	<p>For the lifetime of the relevant cookie or for the period necessary to prepare statistical analyses and reports</p>

<b>User account or loyalty programme management (where available)</b>	Registration details, login credentials, usage history, preferences, information relating to accrued benefits	Article 6(1)(b) GDPR – performance of the account or loyalty programme agreement; Article 6(1)(f) GDPR – legitimate interest consisting in ensuring security and managing customer relationships	For as long as the account remains active or the user participates in the programme, and thereafter until the expiry of applicable accounting and limitation periods
<b>Social media and messaging platforms</b>	Profile name, full name, profile picture, comments, messages, reactions, publicly available profile information	Article 6(1)(f) GDPR – legitimate interest consisting in operating social media profiles, communicating with users, moderating content and analysing user engagement; in certain cases Article 6(1)(b) GDPR	For as long as the content remains available on the relevant social media platform, for the duration of handling the matter, or in accordance with the retention policies of the relevant platform
<b>Compliance with data subject rights under the GDPR</b>	Identification and contact details, request content, documentation relating to the handling of the request	Article 6(1)(c) GDPR – compliance with legal obligations relating to data subject requests; Article 6(1)(f) GDPR – legitimate interest consisting in demonstrating compliance and defending legal claims	For the period necessary to demonstrate proper handling of the request and until the expiry of applicable limitation periods

#### **4. Who Do We Share Your Personal Data With?**

Your Personal Data may be disclosed to the following categories of recipients:

- Zdrojowa Group Companies – to the extent necessary for handling reservations, providing services, processing payments, handling complaints, managing customer relationships or, where the User has been properly informed, conducting marketing activities relating to offers of Zdrojowa Group Companies;
- Operators of the Properties where reservations are made or services are provided;
- Providers of IT systems, hosting services, cybersecurity solutions, e-mail services, CRM systems, marketing automation tools and analytical solutions, including HubSpot, Profitroom, and providers of technologies used on the Website;
- Payment service providers, including Tpay, and entities involved in processing the selected payment method;
- Providers of marketing, advertising, analytics, communication, customer service, call centre, survey, reporting and customer satisfaction services;
- Providers of legal, accounting, auditing, debt collection, archiving, courier and postal services;
- Competent public authorities, courts and other authorised entities, where disclosure is required under applicable law.

We disclose Personal Data to third parties only where there is an appropriate legal basis for doing so, where such disclosure is necessary for the performance of a service, based on your consent, our legitimate interests, or to comply with a legal obligation.

##### **4.1 Reservations and the Profitroom Booking System**

To process reservations, we may use the Profitroom booking engine.

The booking system may be embedded within the Website, in particular on [zdrojowahotels.pl/booking](https://zdrojowahotels.pl/booking), or may operate on Profitroom domains, including [booking.profitroom.com](https://booking.profitroom.com) and [checkout.profitroom.com](https://checkout.profitroom.com).

You may be redirected to Profitroom domains, for example:

- from a Google Business Profile of a Property,
- from a mobile device,
- while selecting an offer,
- while completing your reservation details,
- during payment,
- or when confirming your reservation.

As part of the booking process, we may process, in particular:

- identification and contact details,
- stay details,
- the selected Property,
- reservation dates,
- number of guests,
- guest preferences,
- payment information,
- consents and declarations provided in the booking form,
- technical information relating to your use of the booking system.

Profitroom acts as a technology provider supporting the reservation process.

Where, while using Profitroom domains, you receive separate information regarding the processing of Personal Data or the use of cookies, the privacy information and settings provided within the Profitroom environment may also apply.

#### **4.2. Online Payments and Tpay**

Online payments made through the Website or during the booking process may be processed by Tpay.

To complete a payment, you may be redirected to the environment of the payment service provider or another entity processing the selected payment method.

Tpay may offer various payment methods, including:

- payment cards,
- instant bank transfers,
- BLIK,
- and other payment methods available at the time of the transaction.

Certain payment methods may involve additional entities, including payment institutions, acquiring banks or payment organisations.

Zdrojowa Hotels does not store complete payment instrument details, such as the full payment card number, where such information is transmitted directly to the payment service provider or another entity processing the selected payment method.

We may, however, process information necessary to identify and settle the transaction, including:

- payment identifier,
- payment status,
- transaction amount,
- transaction date,
- reservation number,
- accounting information.

## **5. Marketing and the Use of Personal Data Within the Zdrojowa Group**

5.1. If you subscribe to our marketing communications, we may process your Personal Data in order to send you information about offers, promotions, events and services provided by Zdrojowa Hotels.

Depending on the scope of your consent and the information provided when subscribing, our communications may also include offers from Zdrojowa Group Companies.

5.2. We send e-mail messages, SMS, MMS, telephone communications and other forms of electronic communication only through communication channels for which you have given the appropriate consent, where such consent is required by applicable law.

You may withdraw your consent for any communication channel at any time and object to the processing of your Personal Data for direct marketing purposes.

5.3. Where your Personal Data is to be transferred to another Zdrojowa Group Company for that company's own marketing purposes, you will be clearly informed of this no later than the time your Personal Data or consent is collected.

The current list of Zdrojowa Group Companies is available on the Website under the "[Zdrojowa Group Companies](#)" section.

5.4. For our marketing activities we may use CRM and marketing automation tools, including HubSpot. These tools may enable us to:

- segment audiences,
- manage marketing consents,
- distribute marketing communications,
- analyse message opens and clicks,
- measure campaign effectiveness,
- tailor communications to users' interests.

We do not make decisions based solely on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affect you.

## 6. Social Media and Chatbots

6.1. Zdrojowa Hotels and selected Properties operate official profiles on social media platforms, including Facebook, Instagram, YouTube, TikTok and LinkedIn.

Links to the individual social media profiles of Zdrojowa Hotels and its Properties are available in the table below.

Property name	Social media links
<b>Arté Restauracja</b>	Facebook: <a href="https://www.facebook.com/arte.restauracja.kolobrzeg">https://www.facebook.com/arte.restauracja.kolobrzeg</a> Instagram: <a href="https://www.instagram.com/arterestauracja">https://www.instagram.com/arterestauracja</a>
<b>Baltic Park Fort</b>	Facebook: <a href="https://www.facebook.com/BalticParkFort/">https://www.facebook.com/BalticParkFort/</a> Instagram: <a href="https://www.instagram.com/baltic_park_fort/">https://www.instagram.com/baltic_park_fort/</a>
<b>Baltic Park Loft</b>	Facebook: <a href="https://www.facebook.com/balticparkloft/">https://www.facebook.com/balticparkloft/</a> Instagram: <a href="https://www.instagram.com/baltic_park_loft/">https://www.instagram.com/baltic_park_loft/</a>
<b>Baltic Park Molo Apartments</b>	Facebook: <a href="https://www.facebook.com/BalticParkMolo">https://www.facebook.com/BalticParkMolo</a> Instagram: <a href="https://www.instagram.com/baltic_park_molo_apartments">https://www.instagram.com/baltic_park_molo_apartments</a>
<b>Baltic Park Molo Aquapark</b>	Facebook: <a href="https://www.facebook.com/BalticParkMoloAquapark/">https://www.facebook.com/BalticParkMoloAquapark/</a> Instagram: <a href="https://www.instagram.com/baltic_park_molo_aquapark/">https://www.instagram.com/baltic_park_molo_aquapark/</a>
<b>Boulevard Ustronie Morskie</b>	Facebook: <a href="https://www.facebook.com/BoulevardUstronieMorskie/">https://www.facebook.com/BoulevardUstronieMorskie/</a> Instagram: <a href="https://www.instagram.com/boulevard_ustronie_morskie/">https://www.instagram.com/boulevard_ustronie_morskie/</a>
<b>Cristal Resort Szklarska Poręba</b>	Facebook: <a href="https://www.facebook.com/CristalResortSzkarskaPoreba/">https://www.facebook.com/CristalResortSzkarskaPoreba/</a> Instagram: <a href="https://www.instagram.com/cristal_resort_szklarskaporeba/">https://www.instagram.com/cristal_resort_szklarskaporeba/</a>
<b>Diune Hotel &amp; Resort</b>	Facebook: <a href="https://www.facebook.com/DiuneHotel/">https://www.facebook.com/DiuneHotel/</a> Instagram: <a href="https://www.instagram.com/diune_hotel_kolobrzeg/">https://www.instagram.com/diune_hotel_kolobrzeg/</a>

<b>Entre Hotel</b>	Facebook: <a href="https://www.facebook.com/entrehotelwroclaw">https://www.facebook.com/entrehotelwroclaw</a> Instagram: <a href="https://www.instagram.com/entrehotel/">https://www.instagram.com/entrehotel/</a> LinkedIn: <a href="http://linkedin.com/company/entrehotelwroclaw">http://linkedin.com/company/entrehotelwroclaw</a>
<b>Hilton Świnoujście Resort &amp; Spa</b>	Facebook: <a href="https://www.facebook.com/hiltonswinoujscie/">https://www.facebook.com/hiltonswinoujscie/</a> Instagram: <a href="https://www.instagram.com/hilton.swinoujscie/">https://www.instagram.com/hilton.swinoujscie/</a>
<b>Jantar Hotel &amp; Spa</b>	Facebook: <a href="https://www.facebook.com/JantarSPA/">https://www.facebook.com/JantarSPA/</a> Instagram: <a href="https://www.instagram.com/jantar_hotel_spa_kolobrzeg/">https://www.instagram.com/jantar_hotel_spa_kolobrzeg/</a>
<b>Marine Hotel &amp; Ultra Marine</b>	Facebook: <a href="https://www.facebook.com/MarineHotelUltraMarine/">https://www.facebook.com/MarineHotelUltraMarine/</a> Instagram: <a href="https://www.instagram.com/marine_hotel_kolobrzeg/">https://www.instagram.com/marine_hotel_kolobrzeg/</a>
<b>MarinGo</b>	Instagram: <a href="https://www.instagram.com/maringokolobrzeg/">https://www.instagram.com/maringokolobrzeg/</a>
<b>Onsen Sushi &amp; Grill</b>	Facebook: <a href="https://www.facebook.com/onsensushi">https://www.facebook.com/onsensushi</a> Instagram: <a href="https://www.instagram.com/onsen_sushi_and_grill">https://www.instagram.com/onsen_sushi_and_grill</a>
<b>Oyster Restaurant</b>	Facebook: <a href="https://www.facebook.com/oyster.swinoujsie">https://www.facebook.com/oyster.swinoujsie</a> Instagram: <a href="https://www.instagram.com/oyster.restaurant">https://www.instagram.com/oyster.restaurant</a>
<b>Polonaise Restaurant</b>	Facebook: <a href="https://www.facebook.com/profile.php?id=61557423875258&amp;sk">https://www.facebook.com/profile.php?id=61557423875258&amp;sk</a> Instagram: <a href="https://www.instagram.com/polonaise.restaurant">https://www.instagram.com/polonaise.restaurant</a>
<b>Radisson Blu Resort Świnoujście</b>	Facebook: <a href="https://www.facebook.com/RadissonBluResortSwinoujscie/">https://www.facebook.com/RadissonBluResortSwinoujscie/</a> Instagram: <a href="https://www.instagram.com/radissonbluswinoujscie/">https://www.instagram.com/radissonbluswinoujscie/</a>
<b>Radisson Hotel Szklarska Poręba</b>	Facebook: <a href="https://www.facebook.com/RadissonSzklarskaPoreba/">https://www.facebook.com/RadissonSzklarskaPoreba/</a> Instagram: <a href="https://www.instagram.com/radissonszklarskaporeba/">https://www.instagram.com/radissonszklarskaporeba/</a>
<b>Radisson Resort Aquapark Kołobrzeg</b>	Facebook: <a href="https://www.facebook.com/aquaparkkolobrzeg">https://www.facebook.com/aquaparkkolobrzeg</a> Instagram: <a href="https://www.instagram.com/aquapark_radisson_kolobrzeg/">https://www.instagram.com/aquapark_radisson_kolobrzeg/</a>

<b>Radisson Resort Kołobrzeg</b>	Facebook: <a href="https://www.facebook.com/RadissonResortKolobrzeg/">https://www.facebook.com/RadissonResortKolobrzeg/</a> Instagram: <a href="https://www.instagram.com/radissonresortkolobrzeg/">https://www.instagram.com/radissonresortkolobrzeg/</a>
<b>Royal Tulip Sand</b>	Facebook: <a href="https://www.facebook.com/RoyalTulipSand/">https://www.facebook.com/RoyalTulipSand/</a> Instagram: <a href="https://www.instagram.com/royal_tulip_sand/">https://www.instagram.com/royal_tulip_sand/</a>
<b>Salt Club</b>	Facebook: <a href="https://www.facebook.com/SaltClubSwinoujscie/">https://www.facebook.com/SaltClubSwinoujscie/</a> Instagram: <a href="https://www.instagram.com/saltclubswinoujscie">https://www.instagram.com/saltclubswinoujscie</a>
<b>Zdrojowa Hotels</b>	Facebook: <a href="https://www.facebook.com/zdrojowahotels">https://www.facebook.com/zdrojowahotels</a> Instagram: <a href="https://www.instagram.com/zdrojowa_hotels/">https://www.instagram.com/zdrojowa_hotels/</a> LinkedIn: <a href="https://www.linkedin.com/company/zdrojowahotels/">https://www.linkedin.com/company/zdrojowahotels/</a> TikTok: <a href="https://www.tiktok.com/@zdrojowa_hotels">https://www.tiktok.com/@zdrojowa_hotels</a> YouTube: <a href="https://www.youtube.com/@Zdrojowa_Hotels">https://www.youtube.com/@Zdrojowa_Hotels</a>

6.2. If you visit, follow or interact with our social media profiles, including by commenting on our content, reacting to our posts, sending us messages or using the functionalities available on a particular platform, we may process the information visible on your profile as well as data resulting from such interactions.

At the same time, the operator of the relevant social media platform processes your Personal Data in accordance with its own privacy policy.

6.3. Some of our social media profiles or communication channels may use chatbots or automated response systems.

These tools are intended to provide an initial response to enquiries, direct users to the appropriate information, forms or consultants, and improve the efficiency of our communications.

Where individual assistance is required, the conversation may be transferred to an employee or authorised representative responsible for the relevant area.

6.4. We do not use chatbots to make decisions based solely on automated processing that produce legal effects concerning you or similarly significantly affect you without human involvement.

## 7. Cookies and Similar Technologies

7.1. The Website uses cookies and similar technologies.

These technologies may be necessary for:

- ensuring the proper operation of the Website;
- remembering your preferences;
- generating statistics and analytical reports;
- measuring the effectiveness of marketing activities;
- personalising content;
- supporting the reservation process;
- ensuring security;
- providing advertising services.

7.2. Cookies may originate either from Zdrojowa Hotels or from third-party providers, including providers of analytics, advertising, marketing automation, CRM, cybersecurity, payment services and reservation systems.

Depending on the current configuration of the Website, these may include technologies provided by:

- Google;
- Meta;
- LinkedIn;
- TikTok;
- HubSpot;
- Profitroom;
- Cloudflare;

as well as other providers listed in the current Cookie Declaration.

7.3. Consent for the use of cookies and similar technologies is managed through the Consent Management Platform (CMP) available on the Website.

You may:

- consent to specific categories of cookies;
- refuse consent;
- modify your preferences at any time.

Withdrawal of consent does not affect the lawfulness of processing carried out before such consent was withdrawn.

7.4. A detailed list of the cookies used on the Website, including their providers, purposes and retention periods, is available in the current Cookie Declaration published on the Website.

Where any inconsistency exists between the general information contained in this Privacy Policy and the detailed Cookie Declaration, the [Cookie Declaration](#) shall prevail with regard to the list of cookies and their retention periods.

## 8. Transfers of Personal Data Outside the European Economic Area

8.1. Certain providers of tools used on the Website, in particular providers of analytics, advertising, CRM, marketing automation or social media services, may process Personal Data outside the European Economic Area (EEA).

8.2. Where Personal Data is transferred outside the European Economic Area, we implement safeguards required by the GDPR, including, where applicable:

- an adequacy decision issued by the European Commission;
- Standard Contractual Clauses (SCCs);
- or other legally recognised transfer mechanisms.

Where you use social media platforms or services provided by third-party providers, information regarding international data transfers published by those providers may also apply.

## 9. What Rights Do You Have Regarding Your Personal Data?

As a data subject, you are entitled to exercise the following rights under the GDPR:

- **Right of access** – to obtain confirmation as to whether your Personal Data is being processed and, where that is the case, to access such data and obtain a copy thereof (Article 15 GDPR).
- **Right to rectification** – to request the correction of inaccurate Personal Data or the completion of incomplete Personal Data (Article 16 GDPR).
- **Right to erasure ("right to be forgotten")** – to request the deletion of your Personal Data in the circumstances provided for by applicable law (Article 17 GDPR).
- **Right to restriction of processing** – to request that the processing of your Personal Data be restricted in the cases specified by the GDPR (Article 18 GDPR).
- **Right to data portability** – to receive your Personal Data in a structured, commonly used and machine-readable format and to transmit that data to another controller where processing is

based on your consent or on a contract and is carried out by automated means (Article 20 GDPR).

- **Right to object** – to object, on grounds relating to your particular situation, to the processing of your Personal Data based on our legitimate interests, including profiling (Article 21 GDPR).
- **Right to withdraw consent** – where processing is based on your consent, you may withdraw that consent at any time. Withdrawal of consent shall not affect the lawfulness of processing carried out before such withdrawal. Consent may be withdrawn by contacting us at [iod@zdrojowainvest.pl](mailto:iod@zdrojowainvest.pl).
- **Right to lodge a complaint** – if you believe that the processing of your Personal Data infringes the GDPR, you have the right to lodge a complaint with the competent supervisory authority responsible for data protection.

## 10. Provision of Personal Data

10.1. Providing Personal Data is generally voluntary. However, in certain cases it is necessary in order to use specific Website functionalities, enter into or perform a contract, make a reservation, process a payment, submit or handle a complaint, receive a response to an enquiry or enable us to comply with our legal obligations.

10.2. Failure to provide the Personal Data required within a particular form or process may prevent us from carrying out the relevant activity, including, for example:

- processing a reservation;
- completing a payment;
- responding to an enquiry;
- handling a complaint.

## 11. Data Security

11.1. We implement appropriate technical and organisational measures designed to protect Personal Data against unauthorised access, loss, destruction, alteration or unlawful disclosure.

Access to Personal Data is granted only to authorised persons and to service providers who require such access in order to provide services on our behalf.

11.2. Persons processing Personal Data on our behalf are subject to confidentiality obligations.

Where required under the GDPR, we enter into appropriate Data Processing Agreements (DPAs) with entities processing Personal Data on our behalf.

## **12. Amendments to this Privacy Policy**

12.1. This Privacy Policy may be updated from time to time, in particular where changes occur to:

- the functionalities of the Website;
- technological solutions used by the Website;
- service providers;
- reservation processes;
- marketing models;
- the list of Properties;
- Zdrojowa Group Companies;
- or applicable laws and regulations.

12.2. The current version of this Privacy Policy is always available on the Website.

Where any amendment materially affects the rights or obligations of Users, we may also inform Users of such changes by additional means appropriate to the nature of the amendment.