

PRIVACY POLICY OF ZDROJOWAHOTELS.PL

This document describes the rules for the processing of the Users' personal data collected by the Website, including the procedure concerning the use of cookie files. As regards cases connected with personal data protection at Zdrojowa Hotels Sp. z o.o. you can get in touch with our Personal Data Officer, who is available at the following e-mail address: iod@zdrojowainvest.pl or to the address Zdrojowa Hotels Sp. z o.o., with the "IOD" annotation on the envelope.

1. What is what, i.e. explanation of the meaning of certain words we use in the Privacy Policy.

- 1.1. "Zdrojowa Hotels" (or "we", "us") – i.e. us, the owners of the website available at the address zdrojowahotels.pl, and specifically Zdrojowa Hotels Sp. z o.o. with its registered office in Kołobrzeg, ul. Antoniego Sułkowskiego 9, 78-100 Kołobrzeg, entered in the register of entrepreneurs kept by the District Court in Koszalin, 9th Division of the National Court Register under KRS number 0000296672, share capital of PLN 500,000, REGON: 320441334, NIP: 6711756876
- 1.2. "User" (or "you", or any other personal form in which we address you) – internet user who visits zdrojowahotels.pl (and its web pages), i.e. the Website, or Zdrojowa Hotels Fanpage in social media.
- 1.3. "Privacy Policy" – this document.
- 1.4. "Website" – website available at the address zdrojowahotels.pl.
- 1.5. "Services" – Website's functionalities which we make available to you, e.g. the possibility of booking a hotel room, opening an account. Certain services are available only to those persons who have created the account.
- 1.6. "Cookies" - IT data, in particular text files, which are stored on the User's end device which help use the Website's web pages. Cookies usually contain the name of the web page from which they originate, time for which they are stored at the end device and a unique ID number.
- 1.7. "Personal data" - means the information which on its own or in combination with other information allow your identification, in particular by reference to such data as the name, surname, ID number, localisation data, network ID.
- 1.8. "Zdrojowa Hotels Fanpage" – web pages, accounts, channels conducted by Zdrojowa Hotels in such social media, as: Facebook, Instagram, YouTube, Twitter.
- 1.9. "GDPR" - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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).
- 1.10. "Hotel" – hotels in which it is possible to book a stay through the Website and which are operated by various companies from Zdrojowa Hotels Group.
- 1.11. "Zdrojowa Hotels Group" – operators of the individual hotels in which you can make a booking through the Website, i.e.

OPERATOR'S NAME (A COMPANY FROM ZDROJOWA HOTELS GROUP)	HOTEL'S NAME
<p>Zdrojowa Hotels Sp. z o.o. with its registered office in Kołobrzeg, ul. Antoniego Sułkowskiego 9, 78-100 Kołobrzeg, entered in the register of entrepreneurs of the National Court Register under number 0000296672, kept by the District Court in Koszalin, 9th Division of the National Court Register.</p>	<p>Marine Hotel***** Ultra Marine Diune Hotel***** Diune Resort Sand Hotel***** Jantar Hotel*** & Spa Boulevard Ustronie Morskie Boulevard Residence Cristal Resort Szklarska Poręba</p>

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Zdrojowa Hotels Central Pomerania Sp. z o.o. with its registered office in Kołobrzeg, ul. Antoniego Sułkowskiego 9, 78-100 Kołobrzeg, entered in the register of entrepreneurs of the National Court Register under number 0000386226

Baltic Park Molo Apartments
Baltic Park Fort
Hilton Świnoujście Resort & Spa
Radisson Blu Resort, Świnoujście
Baltic Park Molo Aquapark
Radisson Hotel Szklarska Poręba

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, entered in the register of entrepreneurs kept by the District Court in Koszalin, 9th Division of the National Court Register under KRS number 0000296672, share capital of PLN 500,000, REGON: 320441334, NIP: 6711756876, e-mail: sekretariat@zdrojowahotels.pl

2.2. As we have mentioned in the beginning, in order to secure your personal data we have designated the Persona Data Officer you can get in touch with the fastest at the following e-mail address: iod@zdrojowainvest.pl. You can also send a traditional letter to our address, but remember to add the "IOD" annotation.

2.3. Zdrojowa Hotels uses technical and organisational measures aimed at securing the personal data we receive in compliance with the regulations resulting from applicable legal regulations.

2.4. Before being granted access to the processing of personal data, each person we employ or cooperate with is obliged to keep the personal data confidential. That secret also covers any information concerning the manners in which the personal data entrusted for processing are protected.

3. For what purposes we use your personal data?

3.1. The purpose of processing of personal data by Zdrojowa Hotels is determined by the services we render to the User. Below we have indicated the purposes of processing, as well as the situations in which data are processed. At the same time, we have indicated the legal basis and the period of retention of personal data (data processing period).

PURPOSE OF PROCESSING	EXPLANATION	LEGAL BASIS	DATA PROCESSING PERIOD
The actions aimed at entering into the agreement taken at the User's request	We obtain the data referred to here e.g. when a person interested sends an inquiry concerning the possibility of staying at a given hotel, but has not made a booking yet (has not entered into the agreement)	Article 6 (1) point (b) GDPR – actions aimed at entering into an agreement at the request of the person interested	For the period necessary to provide the relevant information requested by the User
Entering into, proper performance and other activities necessary for performance of the agreement	Once you book a stay, you enter into an agreement on renting a hotel room with us. This section also includes a situation in which you have made a booking, but finally did not stay at a hotel	Article 6 (1) point (b) GDPR – entering into and performance of the agreement	For the term of the agreement, and upon its expiry, for the period necessary to meet the requirements connected with the storage of financial books and securing claims (Article 118 of the Civil Code)

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Handling complaints	If you have lodged a complaint, we will process your personal data in order to respond to it	Article 6 (1) point (f) GDPR – legitimate interest of Zdrojowa Hotels understood as a possibility of taking a stance on the issues mentioned in the complaint lodged.	Up to one year, unless the complaint takes the form of a claim – in such a case, until the claims expire pursuant to Article 118 of the Civil Code
Building the database of the Users for the purpose of sending commercial information (our hotels' offers) by electronic means (SMS, MMS).	If you give consent for receiving offers from us by electronic means. i.e. e-mail, SMS, MMS, your data will be recorded in the database whose aim is to send offers concerning our hotels	Article 6 (1) point (f) GDPR – legitimate interest of Zdrojowa Hotels understood as direct marketing of hotel services in connection with the consent for receiving commercial information by electronic means (Article 10 (2) of the Act of 18 July 2002 on Provision of Electronic Services)	Until the consent for receiving commercial information by electronic means is withdrawn / you object to direct marketing
Telephone contact with the User as a reaction to the need reported by the User in this respect	Through a dedicated plug-in available on the Website you can leave your telephone number to which we will call and respond to any questions you may have	Article 6 (1) point (b) GDPR – actions aimed at entering into an agreement at the request of the person interested	For the period necessary to handle your request
Automation of marketing activities and profiling / monitoring of Users	Using a dedicated tool, we analyse each User's traffic in the Website (through cookie files), and on that basis marketing activity automation rules are set, e.g. sending a marketing message (if you have given consent), retargeting of ads	Article 6 (1) point (f) GDPR – legitimate interest of Zdrojowa Hotels understood as direct marketing of hotel service, including building the User's profile on the basis of a scoring system	Cookies are stored for two years since the User's activity on a web page. If the marketing consent has already been assigned to the User, they, as has been mentioned above, until the consent is withdrawn.
Analysing Users' sessions to identify errors in the Website's operation	We mean the analysis of cookie files thanks to which we can ensure Website's correct operation	Article 6 (1) point (f) GDPR – legitimate interest of Zdrojowa Hotels understood as a possibility of conducting analytical activities with respect to the Website's operation	2 years
Handling the correspondence sent to the e-mail addresses	We mean here personal data which are provided in contact forms or directly in the e-mail we have received.	Article 6 (1) point (f) GDPR – legitimate interest of the data controller consisting in the possibility of registering and managing correspondence, including responding to questions sent by the e-mail / form	Up to 2 years
Conducting financial reporting	We mean here use of personal data to keep accounting and financial documentation, such as accounting documents, invoices, receipts	Article 6 (1) point (c) GDPR in conjunction with the Accounting Act of 29 September 1994, the Tax Law Act of 29 August 1997 and the Tax on Goods and Services of 11 March 2004	5 years from the beginning of the year following the financial year which data files concern.

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Defence against claims and pursuing amounts due	In disputable cases, there may be a need to use measures allowed by law, which involves the need to secure evidence; similarly, such claims arise also in the case of absence of payment for the products ordered.	Article 6 (1) point (c) (in conjunction with Article 118 of the Civil code and point (f) GDPR	Until the expiry of the claims in accordance with generally applicable legal regulations (Article 118 of the Civil Code)
Handling notifications with respect to the powers provided for in Articles 15 – 22 GDPR (exercising the accountability principle)	We mean here handling requests, e.g. a request to delete data, so that the Association could handle and archive them in order to defend against any claims under the GDPR	Article 6 (1) point (c) (in conjunction with Article 5 (2) and point (f) GDPR	Until the expiry of the claims in accordance with generally applicable legal regulations (Article 118 of the Civil Code)

4. Who we make your personal data available to?

- 4.1.** Personal data are disclosed to the companies from Zdrojowa Hotels Group to the extent to which it is necessary to achieve the purpose of the processing of personal data, e.g. booking a stay at a hotel operated by another company than Zdrojowa Hotels.
- 4.2.** Furthermore, personal data are disclosed to entities which support us – on the basis of the services commissioned to them and the processing agreements entered into with them. They also include companies which provide us with certain services in the area of IT and marketing (Benhauer sp. z o.o., ul. Grzegórzecka 21, 31-532 Kraków), communication (LiveCall Software sp. z o.o., ul. Międzynarodowa 55/3, 03-922 Warszawa), which archive and destroy data media, which support us in the legal area, as well as courier companies.
- 4.3.** The transaction data, including the personal data you provide while making payments, are processed by Elavon Financial Services Designated Activity Company (limited liability company with indicated object of economic activity) Branch in Poland, with its registered office in Warsaw, ul. Puławska 17, 02-515 Warszawa.
- 4.4.** In the cases required by generally applicable legal regulations, we reserve the right to make the data available to public administration offices and bodies authorised to process personal data, e.g. law enforcement bodies or courts.

5. What are your rights in the context of your personal data?

Each User has:

- 5.1.** The right of access to their personal data (Article 15 GDPR), including the right to obtain a copy of the data (Article 15 (3) GDPR),
- 5.2.** The right to rectify (correct) or supplement incomplete personal data (Article 16 GDPR).
- 5.3.** The right to demand that their personal data are deleted in the cases provided for by law (Article 17 GDPR).
- 5.4.** The right to make a request for restriction of the processing of personal data (Article 18 GDPR).
- 5.5.** The right to receive their personal data in a structured and generally used format and to transfer them when the processing takes place on the basis of consent or an agreement, and when the processing is performed in an automated manner (Article 20 GDPR).
- 5.6.** The right to object to the processing of personal data if they are processed in order to pursue controller's legitimate interest due to reasons connected with their particular situation, including to profiling (Article 21 GDPR).
- 5.7.** In the cases in which the processing of data takes place on the basis of a separate consent, you have the right to withdraw the consent given at any time, but it will not affect the lawfulness of the processing prior to the withdrawal. The consent can be withdrawn through e-mail contact: iod@zdrojowainvest.pl.
- 5.8.** If the User comes to the conclusion that the processing of personal data is in breach of the GDPR provisions he has the right to lodge a complaint with the supervisory authority, i.e. to the President of the Personal Data Protection Office with its seat in Warsaw at ul. Stawki 2,

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which can be contacted in the following ways:

- by traditional post: ul. Stawki 2, 00-193 Warszawa
- by means of an electronic inbox on the website <https://www.uodo.gov.pl/pl/p/kontakt>
- over the telephone: (22) 531 03 00

5.9. Provision of personal data is voluntary, but in certain situations it is a statutory or contractual requirement, and, consequently, failure to provide them will make it impossible to comply with a legal regulation or to entering into and properly perform the agreement.

6. Social media

6.1. Zdrojowa Hotels (and other operators from Zdrojowa Hotels Group) is present in social media:

NAME OF THE HOTEL / CLUB / COMPANY WEBSITE	LINKS TO SOCIAL MEDIA
Radisson Hotel Szklarska Poręba	https://www.facebook.com/RadissonSzklarskaPoreba/ https://www.instagram.com/radissonszklskarporeba/
Boulevard Ustronie Morskie & Residence	https://www.facebook.com/BoulevardUstronieMorskie/ https://www.instagram.com/boulevard_ustronie_morskie/
Marine Hotel***** & Ultra Marine	https://www.facebook.com/MarineHotelUltraMarine/ https://www.instagram.com/marine_hotel_kolobrzeg/
Cristal Resort Szklarska Poręba	https://www.facebook.com/CristalResortSzklarskaPoreba/ https://www.instagram.com/cristal_resort_szklarskaporeba/
Radisson Blu Resort, Świnoujście	https://www.facebook.com/RadissonBluResortSwinoujscie/ https://www.instagram.com/radissonbluswinoujscie/
Hilton Świnoujście Resort & Spa	https://www.facebook.com/hiltonswinoujscie/ https://www.instagram.com/hilton.swinoujscie/
Radisson Resort Kołobrzeg	https://www.facebook.com/RadissonResortKolobrzeg/ https://www.instagram.com/radissonresortkolobrzeg/
Baltic Park Molo Apartments	https://www.facebook.com/BalticParkMolo/ https://www.instagram.com/baltic_park_molo/
Diune Hotel***** & Resort	https://www.facebook.com/DiuneHotel/ https://www.instagram.com/diune_hotel_kolobrzeg/
MarinGo (klub w hotelu Marine)	https://www.facebook.com/MarinGoKolobrzeg/ https://www.instagram.com/maringokolobrzeg/
Sand Hotel****	https://www.facebook.com/SandHotel/ https://www.instagram.com/sand_hotel_kolobrzeg/
Baltic Park Molo Aquapark	https://www.facebook.com/BalticParkMoloAquapark/ https://www.instagram.com/baltic_park_molo_aquapark/

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Jantar Hotel*** & Spa	https://www.facebook.com/JantarSPA/ https://www.instagram.com/jantar_hotel_spa_kolobrzeg/
Salt (klub w hotelu Radisson Blu Resort, Świnoujście)	https://www.facebook.com/SaltClubSwinoujscie/
Baltic Park Fort	https://www.facebook.com/BalticParkFort/ https://www.instagram.com/baltic_park_fort/
Zdrojowa Hotels	https://www.facebook.com/grupa.zdrojowa/ https://www.instagram.com/zdrojowa_hotels/

which may involve processing User's personal data by us when the User visits the above-mentioned profiles, sites and channels, or interacts with those profiles, sites and channels (likes, subscriptions, comments, messages sent). If the User visits our profiles in such portals as Facebook and Instagram, the data collected concern the User's activity on such a profile, including likes, messages sent to us, comments' content and posts placed on that profile. In such a case, one should remember that, being users of social networking sites, the User and Zdrojowa Hotels are also bound by the privacy policy and regulations accepted as part of that site. The data connected with the User's activity as part of our social media profiles will be stored until the User removes them or they are removed by us or by the owner of a given social networking site. One should also remember that being a user of each of the social networking sites where we have our profile, the User can also manage his account and the content published in accordance with that site's regulations.

7. Cookie files

7.1. We would like to inform you that as part of the Website we use the following types of cookie files:

- strictly necessary cookies (e.g. for logging in to the account),
- session cookies (e.g. tokens securing forms),
- external cookies (Google Analytics, Google Tag Manager, Adwords, etc.).

7.2. We also use cookies for marketing purposes:

- User targeting, i.e. selection of users in order to determine the target group which, to the greatest extent, is interested in ads of our hotel and being redirected to the Website,
- User retargeting, i.e. showing a Zdrojowa Hotels ad only to those Users who have already visited our target site (Website),
- creating lookalike profiles, i.e. looking for Users who are similar to our Users by using information and knowledge about them by means of relevant algorithms, in order to find their "twins", i.e. look for such Users who are as similar to them as possible in terms of interests, behaviour and intentions.
- analysing and reporting effectiveness of advertising campaigns.

7.3. We would like to inform you that the Website collects only the information included in the cookie files which can be combined with personal data, e.g. data provided during the account registration / booking stay at a hotel.

7.4. Furthermore, we would like to inform you that, apart from the above-mentioned purposes, cookie files are used for the following purposes:

- adapting the Website's content to your preferences and optimisation of the way in which the web pages are used. In particular, the files help recognise the User's device and properly display the web page adapted to his individual needs,
- keeping the User's session (if he is logged), which means that the User does not have to log on each subsite of the Website,
- creating statistics which are the basis for analysis how Users use Website's web pages,
- displaying Zdrojowa Hotels ads also on other web pages outside the Website,
- building the User profile on the basis of his decisions and activity,

7.5. Please remember that the software for browsing websites (internet browser) may allow, by default, storing cookies on the User's end device. Users can, at any time, change the cookie file settings, e.g. in such a way that they block automatic cookie handling in the internet browser's settings, or inform Users each time they have been placed on the User's end device.

7.6. Detailed information on the possibilities and ways of managing cookies is available in the internet browser's settings. Below, we present the information on cookie management provided by the following producers of internet browsers:

Firefox (Mozilla)

Internet Explorer

Chrome

Safari

Opera

7.7. Should any of the above-mentioned links fail to work, e.g. the browser's producer has moved the information about cookies to another subsite, you can always use the search engine in order to find relevant information, e.g. by entering "Safari cookie clearing".

7.8. At the same time, we would like to inform you that if you use limitations on placing cookie files, it may affect certain functionalities available on the Website.

8. Analytical tools

8.1. Our Website uses a few types of analytical tools, i.e.: Google Analytics, SalesManago and Facebook Analytics, which are used for analysing internet services. These tools use cookie files which have been saved on your computer and allow analysing the way in which you use the Website. The information concerning the way in which you use the Website obtained by cookie files is usually transferred to Google / Facebook / SalesManago servers and stored there.

8.2. You can prevent cookie files from being saved by means of relevant settings in the browser's software (cf. the links provided above). We would like to point out, however, that in such a case you will not be able to take full advantage of Website's all functions.

8.3. Thanks to the statistics obtained, we can improve our offer and make it more interesting to you. The legal basis for using the analytical tools is Article 6 (1) point (f) GDPR, where the legitimate interest is direct marketing.

8.4. Each entity which has created an analytical tool has its own privacy policy.

- Google - <https://policies.google.com/privacy?hl=pl>
- Facebook - <https://pl-pl.facebook.com/privacy/explanation>
- Salesmanago - <https://www.salesmanago.pl/info/rodo.htm>