

## PRINCIPLES OF PERSONAL DATA PROTECTION

### Processor of the personal data:

Name: HOTEL ALFA s. r. o.  
Seat: Dukelská 70, 087 01 Giraltovce  
CIN: 45 425 116  
Registered in Business Register: DC Prešov, Section: Sro, Part no.: 22876/P  
Represented by: executive manager Peter Juhas  
Contact information to the data subject: +421 911 167 162, asistent@hotel-alfa.sk

The principles of personal data protection summarize our processes for the personal data processing of the data subjects – natural persons providing us with their personal data, or which are provided to us for processing by another subject. When processing your personal data, we proceed as controller of personal data and we act in accordance with the Regulation of the European Parliament and of the Council 2016/679 dated 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) as well as the Act no. 18/2018 Coll. on the Protection of Personal Data and on amendments to certain laws, as amended. The norms included in these legal regulations are binding for all subjects processing the personal data of the EU citizens.

The aim of the Regulation is to increase the protection of the EU citizens and increase their rights when having their personal data processed by state institutions, public bodies, businesses. Our goal is to protect your personal data provided by you. When processing your personal data, we make sure we proceed in accordance with the Regulation and law to avoid any misuse of your data (to protect your right to personal data protection and privacy protection).

For the purposes of the personal data protection, following terms are used:

**Personal data** means any information relating to an identified or identifiable natural person. Personal data includes identifiers such as a name, a birth number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Data subject** is a natural person, whose personal data are being processed, i.e. YOU, our customer.

**Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

HOTEL ALFA s. r. o. respects following legal principles while processing your personal data.

**Principles relating to processing of personal data:**

1. lawfulness, fairness and transparency of processing:

personal data are processed lawfully, fairly and in a transparent manner in relation to the data subject,

2. purpose limitation:

personal data are collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes,

3. data minimisation:

personal data processing is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,

4. accuracy:

personal data are accurate and, where necessary, kept up to date,

5. storage limitation:

personal data are kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed,

6. accountability:

the controller shall be responsible for the data processing and be able to demonstrate compliance with the legislation,

7. integrity and confidentiality:

personal data are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

**What kind of data is processed:** The main pillar of our business activities is provision of catering and accommodation services and rental of immovable and movable assets (personal motor vehicles). We are partnering with other legal persons, businesses. These relationships and processed data are not covered by the Regulation. However, the Regulation concerns processing of personal data of our customers, you, our restaurant and hotel guests. Your personal data are acquired in order to provide you with accommodation and other services provided by Hotel Alfa (e.g. rent of rooms, catering services, etc.). Personal data of data subjects, which we process:

- name, surname,
- date of birth,
- address,
- ID number or passport number,
- telephone number, or email address.

Interior premises of the HOTEL ALFA and the adjacent parking lot are monitored by CCTV for the purposes of property protection and safety. When recording the visual images, we process personal data of the persons entering our premises and the premises of the parking lot. The processor of the personal data from the recordings is our company. Personal data in the recordings are stored for max. 15 days and erased automatically after expiration of the period.

If necessary, for reasons of prosecution of criminal offences, we provide the recordings to the law enforcements agencies.

We are processing the personal data in the information systems “Bezpečnostné kamery”:

- recording of figure and face,
- vehicle licence number.

Your personal data are processed when dealing with complaints, issues or suggestions relating to personal data processing.

We are an owner of a domain. You are able to book a room on our website [www.hotel-alfa.sk](http://www.hotel-alfa.sk) or to contact us via an online form. When booking a room or contacting us through the online form, we are processing your personal data.

- name, surname,
- address (street, city, ZIP code),
- email address,
- telephone number,
- IP address of website visitors.

**Lawfulness of personal data processing:** Article 6 section 1 let. b) of the Regulation – processing is necessary for the performance of a contract to which YOU, our customer, are party (booking of the accommodation, provision of accommodation, provision of service during rent, catering services).

Article 6 section 1 let. c) of the Regulation – processing is necessary for compliance with a legal obligation to which the controller is subject, i.e. us (for issuance of invoices, complaint processes, suggestions),

As for acquiring of your personal data during monitoring of our premises, we act in compliance with our legitimate interests pursuant to Article 6 section 1 let. f) of the Regulation.

**Who do we provide your personal data to:** We are obligated to provide the personal data of our customers to state bodies (alien police, register of citizens of the SR when providing an accommodation, invoices are provided to tax authorities and state control and supervisory bodies in exercising their powers). In case of property or health damage on the premises of the Hotel Alfa, we provide personal data from the CCTV to the relevant state bodies for reasons of prosecution of criminal offences.

**How are your personal data protected:** Information systems processing the personal data are protected by adequate technical and organisational measures, so their damage, destruction, loss, change or misuse is avoided. The network is protected by a firewall and a router, which protects the network and devices from outside access via internet. The structure of the network and computers is secured by used accounts, access rights to computers, servers and storages.

**Period of personal data storage:** Recordings from the CCTV are stored for max. 15 days. Any complaints are stored until resolution. Personal data from the book of guests are stored for 5 years and from the purchase orders for 2 years. After expiration of the deadlines required for the data storage, the personal data are erased.

**Transfer of data to third countries:** Your personal data are not transferred to the countries outside EU.

**Automated decision-making, including profiling:** Your personal data are not processed by an automated decision-making or profiling, i.e. we do not gather personal data for the purposes of user behaviour assessment.

**Information about your rights:** As data subject, whose data are being processed, you have the following rights relating to the data processing:

*Right to access to personal data*

Upon request, you have the right to get a copy of all documents relating to your personal data processing in an electronic form or paper form. Feel free to look up our contact on our website.

*Right to rectification*

You have the right to have your personal data rectified without unnecessary delay or to have them supplemented given the purpose for which your personal data are processed.

*Right to erasure (“right to be forgotten”)*

You have the right to have your personal data erased in case:

- your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
- you object to the processing of your personal data (complaint, complaint filed to an Office) and there are no overriding legitimate grounds for the processing,
- your personal data have been unlawfully processed,
- your personal data must be erased for compliance with a legal obligation in Union or Member State law.

*Right to restriction of processing*

You have the right to have your personal data processed in a restricted form in case:

- you object to the processing of your personal data,
- the processing is unlawful, and you oppose the erasure of your personal data and request the restriction of their use instead,
- we no longer need your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims and request processing in a restricted form.

*Right to object data processing*

You have the right to object to the processing of your personal data. In case you think your personal data are being processed incorrectly or are being processed in conflict with the Regulation or law, you have the right to contact the supervisory body, which in this case is the Office for Personal Data Protection of the SR, Hraničná 12, 820 07 Bratislava 27, [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk), +421 /2/32 31 32 14 by phone or by mail.