

PERSONAL DATA PROTECTION (GDPR)

1. Principles of Personal Data Processing

Navigea Hospitality, s.r.o., Company ID: 56304439, Tax ID: 2122273142, VAT ID: SK2122273142, with its registered office at Hniezdne 118, 065 01 Hniezdne, registered in the Commercial Register of the District Court of Prešov, Section: Sro, Insert No. 48089/P (hereinafter referred to as the "Controller"), in accordance with Regulation 2016/679 GDPR on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "Regulation") and Act No. 18/2018 Coll. on the Protection of Personal Data (hereinafter referred to as the "Act"), has established and regularly updates security measures. These measures define the scope and method of necessary security actions to eliminate and minimize risks threatening the information system, with the aim of ensuring:

- Availability, integrity, and reliability of systems using modern information technologies,
- Protection of personal data against loss, damage, theft, modification, destruction, and ensuring its confidentiality,
- Identification and prevention of potential problems and sources of disruption.

Contact for the responsible person: riaditel@atlashotels.sk

2. Principles of Personal Data Protection

Your personal data will be securely stored in accordance with the data retention policy and only for the period necessary to fulfill the purpose of processing. Personal data is accessible only to authorized persons who process it based on the Controller's instructions. Your personal data will be backed up according to the Controller's regulations. Data stored in backup repositories serves as a preventive measure against security incidents that may arise due to security breaches or data integrity damage.

3. Definitions of Terms

- **Personal Data:** Any information relating to an identified or identifiable natural person (data subject). An identifiable person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, identification number, location data, online identifier, or by reference to one or more specific elements of the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.
- **Processing:** Any operation or set of operations performed on personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or

otherwise making available, alignment or combination, restriction, erasure, or destruction, whether carried out by automated or non-automated means.

- **Restriction of Processing:** The marking of stored personal data to limit its future processing.
- **Profiling:** Any form of automated processing of personal data that involves the use of such data to evaluate certain personal aspects relating to a natural person, particularly to analyze or predict aspects concerning the data subject's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.
- **Information System:** Any structured set of personal data accessible according to specific criteria, whether centralized, decentralized, or distributed on a functional or geographical basis.
- **Controller:** A natural or legal person, public authority, agency, or other entity that alone or jointly with others determines the purposes and means of processing personal data.
- **Processor:** A natural or legal person, public authority, agency, or other entity that processes personal data on behalf of the controller.
- **Definitions of Terms (continued)**
- **Third Party:** A natural or legal person, public authority, agency, or other entity other than the data subject, the controller, the processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.
- **Data Subject's Consent:** Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they, through a statement or a clear affirmative action, express consent to the processing of their personal data.
- **Personal Data Breach:** A security breach that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data that is transmitted, stored, or otherwise processed.
- **Relevant and Reasoned Objection:** An objection to a proposed decision regarding whether a violation of this regulation has occurred or whether a planned measure concerning the controller or processor complies with this regulation. Such an objection must clearly demonstrate the severity of the risks posed by the proposed decision regarding the fundamental rights and freedoms of data subjects and, where applicable, the free movement of personal data within the Union.
- **Purposes of Personal Data Processing**
- Fulfillment of a contract to which the data subject is a party, or the execution of pre-contractual measures at the data subject's request.
- Accommodation and service reservations.
- Ordering goods/services (e-shop) – purchase agreement.
- Processing of accounting documents and handling complaints.
- Processing of personal data based on legislative requirements, regulations, laws, and statistical information.
- Processing of personal data for marketing purposes (email newsletter, cookies).
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4. Purposes of Personal Data Processing

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- Fulfillment of a Contract to Which the Data Subject is a Party or Measures Taken at the Data Subject's Request Before Concluding a Contract

Personal data of our customers are processed based on a contract in accordance with Article 6(1)(b) and Article 6(1)(c) of the Regulation, in compliance with Act No. 404/2011 Coll. on the Residence of Foreigners and Amendments to Certain Acts. Scope of Processed Personal Data: Title, first name, last name, address, country, date and place of birth, payment card number and expiration date, identity document number, phone number, email, purpose of stay. The data are subsequently stored in accordance with Act No. 395/2002 Coll. on Archives and Registries.

Accommodation Reservation

Personal data of our customers are processed based on a contract in accordance with Article 6(1)(b) of the Regulation. Scope of Processed Personal Data: Title, first name, last name, phone number, email, date and time of reservation, IP address. The data are subsequently stored for a period of 10 years in compliance with Act No. 395/2002 Coll. on Archives and Registries.

Service Reservation

Personal data of our customers are processed based on a contract in accordance with Article 6(1)(b) of the Regulation.

Scope of Processed Personal Data:

Title, first name, last name, phone number, email, date, and time of reservation. The data are subsequently stored for a period of 1 year.

Ordering Goods/Services (E-shop/e-booking)

Personal data of our customers are processed based on a contract in accordance with Article 6(1)(b) of the Regulation.

Scope of Processed Personal Data: Title, first name, last name, address, country, phone number, email, IP address. The data are subsequently stored for a period of 10 years.

Processing of personal data during hotel check-in

The processing is necessary to fulfill the contractual obligations and legal requirements of the data controller in accordance with Article 6(1)(b) and (c) of the GDPR. The scope of personal data processed: title, first name, last name, address, date of birth, identification document number, phone, email, purpose of stay (for foreigners), payment details. The data will subsequently be stored in accordance with Act No. 395/2002 Coll. on Archives and Records and other relevant legal regulations related to accommodation and accounting.

Processing of Accounting Documents

The processing of personal data is necessary to fulfill the legal obligation of the controller under Article 6(1)(c) of the Regulation. Scope of Processed Personal Data: Title, first name, last name, address, phone number, account number, email, and signature. The data are subsequently stored in accordance with Act No. 395/2002 Coll. on Archives and Registries.

Complaints

In the event of claims, personal data are processed in accordance with Article 6(1)(c) of the Regulation. Scope of Processed Personal Data: Title, first name, last name, address, phone number, email. The data are subsequently stored in accordance with Act No. 395/2002 Coll. on Archives and Registries.

Debt Collection

In the case of debt collection, personal data are processed in accordance with Article 6(1)(c) of the Regulation. Scope of Processed Personal Data: First name, last name, personal identification

number, address, phone number, email. The data are subsequently stored in accordance with Act No. 395/2002 Coll. on Archives and Registries.

Enforcement Proceedings

The processing of personal data is necessary to fulfill the legal obligation of the controller under Article 6(1)(c) of the Regulation. Scope of Processed Personal Data: General personal data, additional personal data identified or provided during the proceedings. The data are subsequently stored in accordance with Act No. 395/2002 Coll. on Archives and Registries.

Job Applicant Records

The processing of personal data of job applicants is carried out based on the applicant's "Consent" to data processing under Article 6(1)(a) of the Regulation. The controller will contact only successful applicants. Personal data is processed for three years from the date of consent. There is no transfer of personal data to third countries. Personal data will not be used for automated decision-making, including profiling.

Before the mentioned period expires, you may withdraw your consent for data processing at any time by sending a request to riaditel@atlashotel.sk or by mailing a written request to the Controller's address with the text "GDPR consent withdrawal" on the envelope. The Controller declares that if a written request for data processing termination is received before the specified period, the data will be deleted within 30 days of receiving the withdrawal request.

Newsletter (e-mail)

Personal data will be processed only for sending newsletter messages to the email address you provide. By subscribing to the newsletter, you agree to the processing of your personal data under Article 6(1)(a) of the Regulation. Your email address will be processed until you unsubscribe from the newsletter. You can unsubscribe by clicking the "unsubscribe" link in the email. Scope of processed personal data: email address.

Data Controller: Navegea Hospitality, s.r.o., IČO: 56304439, DIČ: 2122273142

Processing of Personal Data through Cookies

Processing is necessary to ensure the functionality of the website, optimize it, and improve the user experience in accordance with Article 6(1)(f) of the GDPR, considering the legitimate interest of the data controller. Cookies are used to analyze user behavior on the website, personalize content and advertisements, and improve the website's performance. Current cookie settings can be adjusted at any time directly on the website through the cookie settings. Personal data

collected through cookies are stored in accordance with applicable legal regulations concerning data protection and archiving.

Surveillance for Property Protection

Our premises are equipped with a CCTV system that monitors indoor and outdoor areas for property protection. This monitoring is carried out under the controller's legitimate interest in accordance with Article 6(1)(f) of the GDPR. CCTV recordings are not shared with third parties. Access to these recordings is restricted to authorized personnel of the controller and the IT team responsible for maintenance. Personal data obtained through the CCTV system is used exclusively for property protection. CCTV recordings may be used as evidence in administrative proceedings if necessary. If recordings are not used for criminal proceedings or offense investigations, they are automatically deleted within 7 days through programmed deletion.

5. Rights of the Data Subject

- **Right to Withdraw Consent:** You can withdraw your consent for data processing at any time. The withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.
- **Right of Access:** You may request a copy of your personal data and information on how it is used.
- **Right to Rectification:** If your personal data is inaccurate or incomplete, you can request its correction.
- **Right to Erasure:** You may request the deletion of your personal data if it is no longer needed for the original processing purpose.
- **Right to Restrict Processing:** Under certain circumstances, you can request the restriction of processing of your personal data.
- **Right to Data Portability:** You can request your personal data to be transferred to another controller.
- **Right to Object:** You may object at any time to the processing of personal data based on legitimate interests.
- **Right to Non-Automated Decision-Making:** You can request not to be subject to decisions based solely on automated processing, including profiling.

6. Exercising Rights

Requests for exercising data subject rights can be sent via email to: riaditel@atlashotel.sk or by mail to the registered address of the controller. Your request will be processed without undue delay, no later than one month from the date of receipt.

7. Responsible Person and Supervisory Authority

The controller has appointed a responsible person for data protection, who can be contacted via email at: riaditel@atlashotels.sk. The supervisory authority for data protection is the Office for Personal Data Protection of the Slovak Republic, and its contact details can be found on the website www.dataprotection.gov.sk. If you believe that any personal data we have about you is incorrect or incomplete, please contact us. If you wish to lodge an objection regarding the way we process your personal data, please contact our responsible person via email at riaditel@atlashotel.sk or in writing at the following address: Navigea Hospitality, s.r.o. Hniezdne 118, 065 01 Hniezdne

Our appointed person will review your objection and work with you to resolve the matter.

Personal Data Protection – Information Obligation

If you believe that your personal data is being processed unfairly or unlawfully, you may file a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; phone: +421 /2/ 3231 3214; email: statny.dozor@pdp.gov.sk, <https://dataprotection.gov.sk>.