

PRIVACY POLICY

I. Introduction to the Privacy Policy

1. This Privacy Policy sets out principles for the processing and protection of personal data in connection with services provided by **Bukowiańskie Towarzystwo Geotermalne Sp. z o.o.** (hereinafter referred to as the **Company**), including: BUKOVINA Hotel, BUKOVINA Thermal Baths and Harnaś Hotel.

This Policy applies to:

- the use of our services and products;
 - cooperation with our customers and business partners;
 - our websites and social media profiles.
2. To take care of the safety of personal data, the Company operates on the basis of its internal procedures and regulations in accordance with applicable legal acts on personal data protection, including in particular the 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 (hereinafter referred to as the GDPR).
 3. In its activity the Company only uses data necessary to achieve each goal for which the personal data are processed.

II. Data Controller

The data controller for personal data processed in connection with service provision is Bukowiańskie Towarzystwo Geotermalne Sp. z o.o. with its registered office in Bukowina Tatrzańska, ul. Sportowa 22, 34-530 Bukowina Tatrzańska, entered in the register of companies kept under the National Court Register by the District Court for Kraków Śródmieście in Kraków, 12th Commercial Division of the National Court Register, under the number 0000133262 (hereinafter referred to as the "Data Controller").

III. Data Protection Officer

A contact person for issues related to the processing of your personal data is the Data Protection Officer, appointed by the Data Controller, which can be contacted by e-mail at iod@bukovina.pl or by mail at the following address: Bukowiańskie Towarzystwo Geotermalne Sp. z o.o., ul. Sportowa 22, 34-530 Bukowina Tatrzańska, with the annotation "Data Protection Officer".

IV. Data processing categories

In connection with the Company's activities, the following personal data can be processed in reasonable circumstances:

1. Actions taken before the execution of an agreement, the execution and

performance of the service agreement:

- first name and surname,
- first name and surname of a minor,
- place of residence,
- PESEL,
- date and place of birth (if there is no PESEL),
- country of residence of a foreign tourist,
- disability certificate (to use disability discounts),
- health data for treatment purposes (e.g. cosmetic treatment, hyperbaric oxygen therapy),
- telephone number,
- vehicle plate number,
- personal data given in correspondence,
- information about stay, type of services,
- business name,
- unique taxpayer reference (NIP),
- statistical ID (REGON),
- account number,
- ATM/credit card number,
- other necessary data, e.g. to have forgotten things returned,
- appearance (profile).

2. Marketing actions:

- first name and surname,
- business name,
- e-mail address
- telephone number,
- nick in social media.

3. Automated collection of information:

- information about the device,
- cookies,
- IP addresses,
- information about the browser,
- other information about users and their way of conduct.

V. Source of personal data

Personal data that are processed by the Company are received directly from you or other persons authorised by use or entities in connection with their business activity, as well as automatically, e.g. via cookies.

VI. Purposes and basis of personal data processing

Your personal data will be processed by the Company for the following purposes:

1. Based on Art. 6.1.a of the GDPR, to obtain the user's consent, i.e. to:

- start the marketing of own services;
- send newsletters by e-mail;
- save data in cookies;

- organise competitions.
2. Based on Art. 6.1.b of the GDPR, to take actions at the user's request, i.e. to:
 - actions taken before executing the agreement at a request of the data subject;
 - the execution and performance of the service agreement by the Company;
 - the confirmation of services offered by the Service and used by the data subject;
 - the receipt of booking via the online booking system.
 3. Based on Art. 6.1.c of the GDPR, to comply with a legal obligation to which the Data Controller is subject, i.e. to:
 - review complaints;
 - archive data of people using documented services offered by the Data Controller;
 - keep accounting, fiscal and tax records.
 4. Based on Art. 6.1.d of the GDPR, to protect vital interests of the data subject, i.e.:
 - the processing of data of accompanying persons, including children, using hotel, swimming pool and Wellness services (as reasonable).
 5. Based on Art. 6.1.f of the GDPR, to achieve the Data Controller's legitimate interests, i.e. to:
 - identify, pursue and defend mutual claims arising from non-performance or inadequate performance of the agreement;
 - ensure the safety of people staying within the monitored area (including the safety of employees) and order and to protect the property;
 - conduct direct marketing actions otherwise than on the basis of the consent (discount cards, loyalty programmes, occasional gifts and Christmas cards);
 - respond to users' inquiries sent via the contact form.

Personal data are disclosed voluntarily and the consent can be withdrawn at any time. The withdrawal of the consent is without prejudice to the compliance of processing based on the consent given before such withdrawal.

In the case of civil-law agreements, personal data are mandatory. Otherwise, the service cannot be provided.

Personal data disclosed by you in social media (comments, opinions) are not subject to this Privacy Policy as they cannot be protected against private individuals or companies.

VII. Profiling

The Data Controller does not make any decisions that have a legal effect or influence you in a similar way. The Data Controller is entitled to automated decision-making, including profiling, to carry out its marketing actions (including the automated adjustment of advertisements to your interests and the measurement of the effectiveness of those advertisements) and develop its offer based on Art. 6.1.a of the

GDPR. This is without prejudice to your legal status. You have the right to object to profiling if it has a negative impact on your rights and obligations.

VIII. Data transfer to third countries

The personal data will not be transferred outside the European Union or the European Economic Area (EEA), i.e. to third states, or to international organisations.

IX. Recipients of personal data

The data recipients will be:

- authorised employees of the Data Controller;
- entities that entered into processing agreements or are authorised to fulfil their obligations in accordance with the Data Controller's instructions;
- entities providing the following services to the Company:
 - a. hosting and IT services,
 - b. legal and insurance services,
 - c. book-keeping services,
 - d. advisory services,
 - e. courier and post services,
 - f. services related to the management of newsletter database and sending;
 - g. services related to the operation of the booking module in our website;
 - h. marketing services;
 - i. which perform their duties in connection with their cooperation with the Company;
- public authorities and services based on relevant regulations to obtain personal data, provided that they have relevant legal basis to request such data;
- owners of websites/browsers, like Google, YouTube, Facebook and others, whose plugs can be available in the Company's websites and social media profiles.

X. Retention period

1. In the case of service agreements, personal data will be retained throughout the term of those agreements and thereafter as necessary:

- a. data related to the execution and performance of the agreement and the use of hotel services by the Guests: for the lawful period applicable to tax obligations (5 years from the beginning of the year following the financial year in which operations, transactions, actions and accounting evidence and reports were completed) or civil-law claims (6 years from the end of the limitation period applicable to claims related to service provision, as at the last day of the calendar year), whichever is longer;
- b. data necessary to make the performance of services easier and to provide top service quality, including actions related to comments and complaints: for the whole handling period, unless, in a given case, the data must be retained for the period set out in the previous item;
- c. data provided to ensure the order and the safety of people and property in the Hotel, as well as the comfort to the Guests (including accompanying persons and children): for the period necessary to achieve such a goal, provided that the data processed in relation to the CCTV will be processed for 14 days from the recording date and then will be deleted via overrecording;
- d. data provided to ensure the compliance of actions taken with other legal

- regulations: for the period set out in those regulations;
- e. data of people taking advantage of services offered by BUKOVINA Hotel and HARNÁŠ Hotel consisting in archiving in a written form (guest forms): for 3 years due to the limitation of customers' claims. Then, the data will be utilised by an authorised entity with which the Company has entered into the processing agreement.
Guest forms including the customer's marketing consent will be retained till the withdrawal of that consent.
 - f. data of accompanying persons that take advantage of hotel or Wellness services will be processed until the purpose expires. Then they will be archived in the BETASI system (for 20 years). Data of children collected in the booking systems (e.g. to provide Wellness services) will be deleted as of the end of the expiry of the purpose of the processing.
2. In other cases, personal data will be processed till the withdrawal of the consent or objection to processing or till the moment the data become unnecessary for the purpose. The withdrawal of the consent is without prejudice to the lawfulness of the processing made before the withdrawal by the Data Controller.

XI. Rights connected with data processing

1. Rights of data subjects

You have the right to:

- a) access and obtain a copy of your data and obtain information about the processing of your data;
- b) rectify (correct and supplement) your data;
- c) restrict the processing;
- d) have the data erased;
- e) object to the personal data processing;
- f) data portability;
- g) lodge a complaint with the supervisory authority;
- h) withdraw your personal data processing consent at any time, however without prejudice to the processing conducted on the basis of that consent before the withdrawal.

In addition, the data subjects whose data are processed for CCTV purposes have relevant rights as set out in the GDPR:

- a) the right to information about the existence, range, purpose of a CCTV system in the specific place and the name, address and contact data of an entity responsible for the installation of such a system;
- b) the right of access to recordings if reasonable;
- c) the right to have your data erased;
- d) the right to the anonymisation of your image in the recorded images and/or have your personal data erased;
- e) the right to the data processing for a limited period

All requests concerning the above rights should be submitted in writing to the following address: Bukowiańskie Towarzystwo Geotermalne Sp. z o.o., ul. Sportowa 22, 34-530 Bukovina Tatrzńska, with the annotation "Data Protection Officer" or by e-mail to iod@bukovina.pl

XII. Cookies Policy

1. The user is informed about the use of cookies the first time they visit hotelbukovina.pl, termybukovina.pl, hotelharnas.com, wellness.bukovina.pl. If the user displays the website, they are deemed to accept ordinary cookies. Detailed information about the Cookies Policy is available [HERE](#).

Collection of personal data of people below 18 years of age (children)

We neither collect (intentionally) or seek any personal data of people below 18 years of age nor let the minors book rooms at our hotel. If we find out that we have acquired personal data of a minor person without the consent of their parent or legal guardian, the data will be erased immediately. If you believe that we have or could have any data of a minor person or data coming from such a person, please contact us at iod@bukovina.pl.

Personal data of minor persons are processed solely for the purpose of services offered by BUKOVINA Thermal Baths and BUKOVINA Wellness. In that case, the data are processed on the basis of the written consent of parents/legal guardians.

As there is CCTV system installed in all BTG facilities, we process personal data in the form of an image. This is done, however, solely to ensure the safety of people staying within the monitored area (including the safety of employees) and order and to protect the property.

XIII. Contact us

To ensure the top quality of our services, we encourage you to send your inquiries, comments, notes and conclusions concerning our Privacy Policy to iod@bukovina.pl.

Bukowiańskie Towarzystwo Geotermalne Sp. z o.o.

