



## Privacy Policy FILM HOTEL

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## **General information:**

The Administrator / Controller attaches particular importance to the security of personal data and the respect towards its customers', contractors' and Website users' privacy. By using the Services / Websites, in particular by setting up an account there and by giving relevant consents, the user consents to the privacy policy and the cookies policy specified in this document.

Some personal data is required when making bookings at the Services / Websites (e.g. first name and surname, telephone number). Some user's data may be collected automatically when you visit the Services / Websites (e.g. IP address, domain name, browser, operating system, Cookie files). Detailed information on the collection of Cookie files can be found in the "COOKIE FILES" section below.

The Administrator / Controller ensures the security of shared personal data referring to Website users, in particular against its access by any unauthorised persons. When running the Services / Websites, the Administrator / Controller makes use of any technical means provided by law, the purpose of which is to secure personal data collected by the Administrator / Controller in the best possible manner against any unauthorised access or use by unauthorised persons.

The Administrator / Controller may make use of automated decision making, including profiling, for marketing purposes and in order to adjust business offers, but under no circumstances shall such processing have legal effects on Data Subject or similarly affect him/her.

The Administrator / Controller reserves the right to change the privacy policy under the Service / Website, which may be caused by the development of online technology, potential legal changes in the range of personal data protection and the development of the Service / Website itself.

## **I. Processing of hotel guests' personal data**

### **Purpose of processing personal data**

Hotel guests' personal data is processed for:

1. provision of hotel services
2. booking hotel rooms in line with user's wishes;
3. processing user's complaints and return of payments / benefits in case of withdrawal from their contract;
4. pursuing and defending claims;
5. making financial and accounting settlements;
6. undertaking marketing activities (if relevant consent is given, also using electronic communication channels).

### **Legal grounds for processing**

If the processing of personal data is conducted for the purpose of providing hotel services, it is based on Article 6 (Clause 1, Item b) of 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 (hereinafter: the Regulation) which states that it is necessary to execute an agreement to which a given Data Subject is a party or to take action at the request of such a Data Subject prior to the conclusion of this agreement.

In other cases, the processing will take place on the basis of Article 6 (Clause 1, Items: a, c and f) of the Regulation, i.e. in connection with the implementation of legal requirements, the exercise of legitimate interests of FILM HOTEL Sp. z o. o., as well as on the basis of a given Data Subject's consent.

### **Legitimate interest**

The Data Administrator / Controller has a legitimate interest both in asserting its rights and in defending itself against unjustified claims made against the Company. Any operations related to the assertion and defence against claims, as well as such related to building a corporate brand, developing a customer base, creating a friendly atmosphere around the company are the key factors which support running business activities, so - as such - they are covered by Article 16 of the European Charter of Fundamental Rights.

### **Processing time**

Hotel guests' details are stored from the moment of making a booking, during your stay at the hotel, and later during the period when it is possible to pursue claims and when we are obliged to store settlement details in line with fiscal regulations, i.e. for five years from the end of a given settlement period in which we have provided our service.

In case of giving a consent to the processing of personal data for direct marketing purposes via electronic means of communication, such processing personal data and the achievement of its purpose is not a process which can be completed within a specific period of time, so such data may be processed until a given Data Subject has revoked his or her consent or filed an objection.

### **Voluntary provision of personal data**

Providing personal data is voluntary, however, a lack of your consent to our processing of personal data may prevent us from providing our services and making bookings at our Systems / Websites, so this is one of the conditions of concluding an agreement for the provision of our hotel services. The requirement to collect Hotel Guests' basic personal data in order to provide hotel services also results from the Civil Code Act in terms of the identification of parties of such an agreement.

### **Rights held by Data Subjects**

You have the right to request access to your personal data, transfer and rectify such data and, in justified cases, restrict its processing.

### **Recipients of personal data**

A group of recipients of such Personal Data may include: the authorities, institutions and entities authorised under the law, as well as entities providing services to the Administrator / Controller (e.g. legal, IT, marketing, accountancy services and other entities participating in the provision of the services ordered).

This group of recipients of Personal Data may also include: attorney-at-law's firm, Company which ensures security at our facility - Solid Security, Profitroom (when you have made use of its intermediary services while booking).

The entity which pays for our services may always, in order to pursue its legitimate interests, request to be given the details of persons who have used the services which charged its account. As regards the Hilton Honors program and your use of DoubleTree by Hilton services provided globally (for example, accepting hotel bookings, providing services on behalf of Hilton Worldwide Holdings Inc.,

entering hotel guest details into IT systems, supporting Hilton Worldwide in its marketing activities), your data will be administered and controlled by Hilton Worldwide.

### Processing of personal data beyond the EEA

Hilton Worldwide also processes personal data beyond the EEA and the security of such data is ensured by means of standard contractual clauses. In this respect, FILM HOTEL sp. z o.o. acts as the Processor of your personal data on behalf of Hilton Worldwide. Details on the processing of personal data by Hilton Worldwide are set out in the Global Privacy Policy, which can be viewed at:

[https://hiltonhonors3.hilton.com/pl\\_PL/policy/global-privacy-statement/index.html#ContactUs](https://hiltonhonors3.hilton.com/pl_PL/policy/global-privacy-statement/index.html#ContactUs)

Any inquiries regarding this Declaration and the manner in which Hilton processes your personal data should be sent to the following e-mail address: [customer\\_privacy@hilton.com](mailto:customer_privacy@hilton.com) or the following postal address: Hilton Customer Privacy Protection, 7930 Jones Branch Drive, McLean, VA 22102, USA.

## II. Processing of contractors' and other persons' personal data under B2B

### Purpose and legal grounds for the processing of personal data

Data under this category is processed for the purpose of executing contracts, conducting legitimate settlements as well as pursuing potential claims or defence against such claims. Article 6 (Clause 1, Items: B, C and F) of the GDPR forms the basis for such processing.

If a given contractor provides our company with personal details of its employees, for example, in order to perform any contract, or of any employee delegated for other reasons to cooperate with FILM HOTEL Sp. z o.o., the processing of such data is necessary to accomplish our legitimate interest, a fundamental right of each and every company, i.e. to conduct business activity.

### Material scope of the GDPR and its application

As stated in the recital 14 of the GDPR, it does not apply to the processing of personal data relating to legal persons, in particular to enterprises which are legal persons, including corporate data such as: a company name, legal form and contact details. Nevertheless, FILM HOTEL Sp. z o.o. ensures the highest care and attention to contact details referring to both legal entities and natural persons. However, due to the exclusion of contact details referring to entities with legal personality, the present Privacy Policy applies to personal data of natural persons only.

### Application of electronic communication channels

Pursuant to Article 10 of the Act of 18 July 2002 on the provision of services by electronic means, it is prohibited to send any unsolicited commercial information addressed to a designated recipient who is a natural person by means of electronic communication, in particular by electronic mail. In general, FILM HOTEL sp. z o.o. does not address offers and proposals to natural persons. Our representatives address their offers and proposals to business clients.

However, if persons who perform functions within the structures of our business clients make use of private mailboxes or are natural persons conducting business activities, any contacts related to direct marketing will be preceded by a request to give relevant consent.

### Legitimate interest held by the Administrator / Controller

There is no chance of successful operation on the market without interacting with the external environment, without building business relations with representatives of other companies, without

continuous contact of staff members with other people, so, in this case, a legitimate interest refers to conducting business activity in line with the principles of economic freedom by persons who are owners of the company. The Administrator/ Controller also has a legitimate interest both in asserting its rights and in defending itself against any unjustified claims made against the company. Any operations related to the assertion and defence against claims are the key factors which support running business activities, so as such are covered by Article 16 of the European Charter of Fundamental Rights.

### **Who we share contractors' personal data with**

Apart from the Administrator / Controller, access to personal data may only be granted to software servicing operators in the field of handling accounts or entities authorised to do so under other regulations (e.g. tax chamber, attorneys-at-law or financial auditors).

Contact details to our contractors or their employees, especially if they are our clients, may be transferred – by way of entrusting - to our subcontractors.

### **How long we process contractors' data**

Pursuant to Article 86 § 1 of the Tax Ordinance, taxpayers keep their tax books and related documents until the relevant tax liabilities become barred by limitation. Tax liabilities become barred by the statute of limitation after 5 years from the end of the calendar year in which the deadline for tax payment expires (cf. Article 70 § 1 of the Tax Ordinance). This means that taxpayers are obliged to keep their tax books and related documents and records (e.g. for VAT purposes) for 5 years from the end of the calendar year in which the deadline for tax payment expires. This period to keep tax books may be extended if the limitation period for a tax liability does not start, is suspended or interrupted (vide Articles 68-71 of the Tax Ordinance).

We will retain the details of our clients' contact persons during the term of our agreement, until they object to it or we are notified of any change of such (a) contact person(s). Other data is processed until the purpose of such processing is achieved (e.g. the end of a given project), and when the processing of personal data and the achievement of its purpose is not a process which can be completed within a specific period of time, the data from this collection is processed until a given Data Subject submits objection to the processing of such data or such data becomes useless for another reason.

### **Rights held by contractors**

Data Subjects have the right to demand from FILM HOTEL Sp. z o. o. access to their personal data and to request its rectification or, in justified cases, objection or restriction of its processing.

### **Right to restrict the processing of personal data**

When requesting a restriction of data processing, the reason for such requesting is to be specified.

Pursuant to the GDPR, a restriction in the field of data processing can only take place in a few cases:

- when the accuracy of any data processed is questioned,
- when the lawfulness of data processing is questioned,
- when a given Data Subject requests a restriction of data processing by invoking the need to keep his or her data at FILM HOTEL Sp. z o.o. in order to establish, assert or defend his or her claims, and the legal condition for such processing ceases to apply. In such a situation, it is up to the person demanding such a restriction to demonstrate that he or she needs the data for this purpose.

### **Right to delete data**

It applies in situations when data is no longer required for the purposes for which it was collected.

The above-mentioned right may be exercised by contractors making a request via any communication channel. Within one month, FILM HOTEL Sp. z o.o. will inform such contractors on how a given case is resolved or if it is necessary to extend this period for two more months at maximum (e.g. due to the complex nature of such a request or a large number of requests made).

### **Automatic decision making**

FILM HOTEL Sp. z o.o. does not process contractors' data under automated decision-making, including profiling, which could have legal effects on them or significantly affect them.

### **Is it mandatory to provide personal data?**

The requirement to collect contractors' personal data in order to make settlements is imposed by Article 106e of the Act on VAT and the Regulation of the Minister of Finance of 3 December 2013 on the issuance of invoices extended by other information which is helpful in handling invoices, e.g. contact details and information on payment methods.

In other cases, the provision of personal data is not mandatory but may be required for the performance of B2B contracts.

## **III. Information on data processed for marketing purposes**

### **Purpose and legal grounds for the processing of personal data**

Personal data is processed to support sales structures and build positive relations with existing and potential clients of FILM HOTEL Sp. z o.o. The legal grounds for the processing of personal data comes from Article 6 (Clause 1, Item A and F) of the Regulation of the European Parliament and of the Council (EU) no. 2016/679 dated 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 on the repeal of Directive 95/46/EC (hereinafter as the GDPR). In the case of telephone calls, your personal data is also processed to provide relevant information.

A person's consent is required when using e-mail addresses and telephone numbers for marketing purposes (Article 10 of the Act on the provision of electronic services and Article 172 of the Telecommunications Law).

### **Material scope of the GDPR and its application**

As stated in the recital 14 of the GDPR, it does not apply to the processing of personal data relating to legal persons, in particular to enterprises which are legal persons, including corporate data such as: a company name, legal form and contact details. Nevertheless, FILM HOTEL Sp. z o.o. ensures the highest care and attention to contact details referring to both legal entities and natural persons. However, due to the exclusion of contact details referring to entities with legal personality, the present Privacy Policy applies to personal data of natural persons only.

### **Application of electronic communication channels**

Pursuant to Article 10 of the Act of 18 July 2002 on the provision of services by electronic means, it is prohibited to send any unsolicited commercial information addressed to a designated recipient who is a natural person by means of electronic communication, in particular by electronic mail. In general, FILM HOTEL sp. z o.o. does not address offers and proposals to natural persons. Our representatives address their offers and proposals to business clients.



However, if persons who perform functions within the structures of our business clients use private mailboxes or are natural persons conducting business activities, any contacts related to direct marketing shall be preceded by a request for giving an appropriate consent.

### **Description of legitimate interest**

Any operations related to building a brand, developing a customer base, creating a friendly atmosphere around your company as well as defending against claims are the key factors which support business performance, so as such they are covered by Article 16 of the European Charter of Fundamental Rights and are the accomplishment of the Company's legitimate interests.

### **Rights held by persons whose data we process**

Data Subjects have the right to request from FILM HOTEL Sp. z o.o. access to their personal data, to its transfer and rectification. They are also granted the following rights by the GDPR:

#### **Right to restrict the processing of personal data**

When requesting a restriction of data processing, the reason for such requesting is to be specified. Pursuant to the GDPR, a restriction in the field of data processing can only take place in a few cases:

- when the accuracy of any data processed is questioned,
- when the lawfulness of data processing is questioned,
- when a given Data Subject requests a restriction of data processing by invoking the need to keep his or her data at FILM HOTEL Sp. z o.o. in order to establish, assert or defend his or her claims, and the legal condition for such processing ceases to apply. In such a situation, it is up to the person requesting to demonstrate that he or she needs the data for that purpose.
- where a person has raised an objection to the processing for marketing purposes and it has not been taken into account.

#### **Right to object**

This right applies to the processing of personal data for direct marketing purposes.

#### **Right to give and revoke consents**

As long as a given Data Subject gives his or her consent to additional processing operations (e.g. making use of electronic means of communication to send commercial information), this consent may be revoked at any time, but at the same time the processing of personal data which was conducted on the basis of his or her consent prior to this revocation will remain lawful.

#### **Right to delete data**

It applies to situations when data is no longer required for the purposes for which it was collected.

The above-mentioned rights can be exercised by Data Subjects by making a request via any communication channel. Within one month, FILM HOTEL Sp. z o.o. will inform how a given case is resolved or if it is necessary to extend this period for two more months at maximum (e.g. due to the complex nature of such a request or a large number of requests made).

In the case of data processed on the basis of consent, the revocation of consent is treated by us as a request to delete such data. In this case, if we do not process such data for other purposes, the data will be deleted on separate legal grounds.

## **Automatic decision making**

FILM HOTEL Sp. z o.o. does not process personal data under automated decision-making, including profiling, which could have legal effects on it or significantly affect it.

## **How long we process data for marketing purposes**

Since the processing of personal data and the achievement of its purpose is not a process which can be completed within a specific period of time, the data from this collection is processed until a given Data Subject revokes his or her consent or submits objection.

## **Who we share personal data with**

FILM HOTEL Sp. z o.o. will not make the data processed for marketing purposes available to other recipients, however, in some cases we may entrust the processing to our subcontractors or agencies with which we cooperate to promote our company.

In exceptional cases, it can also be accessed by software providers.

## **Is it mandatory to provide personal data?**

The provision of data and consent is entirely voluntary.

## **How do we collect data used for marketing purposes?**

Such data is collected in a variety of manners:

- **Contracts concluded with customers**  
For marketing purposes, only details provided by persons who have given their consent are used. Contact details such as an e-mail address and telephone number given at the stage of signing a contract shall only be used for marketing purposes if relevant consent is given.
- **Contact form**  
If a request for an offer / proposal can be derived from a message left in the contact form on our website, the very fact of leaving the e-mail address constitutes a consent to our reply, and thus to sending commercial information.
- **Sending an inquiry (e-mail)**  
If an inquiry regarding our offer / proposal is sent to us to our company's e-mail address, or if a telephone number is additionally provided in this inquiry, we have the right to treat the mere fact of sending us this inquiry as an consent to provide an answer, which may also be considered to be direct marketing within the scope of this inquiry.
- **Conversation with our representative**  
If, during a conversation with our consultant, you consent to be contacted by telephone or e-mail for marketing purposes.

The very fact of asking a question about our company's offer is treated as a consent to reply back to answer it.

- **Public registers and information available online**  
In order to establish business relations with newly registered companies, our Active Sales Department, which cooperates with businesses may send a letter of encouragement to start cooperation in the field of telecommunication services. For this purpose, we collect - from publicly available registers - details of entrepreneurs and persons running business within the range of our network in order to reach them with our offer for cooperation.

### **DOUBLETREE BY HILTON ŁÓDŹ**

Film Hotel Sp. z o. o.

ul. Łąkowa 29, 90-554 Łódź

Tel +48 42 2088000, Fax +48 42 2088001

NIP: 7272750210 REGON: 100738406 KRS: 0000336343

lcjdl.res@hilton.com

[doubletreelodz.pl](http://doubletreelodz.pl) | [lodz.doubletree.com](http://lodz.doubletree.com)

In this respect, in order to aggregate and organise information, we can be supported by professional database management units and analytical companies in the field of these publicly available registers.

As for natural persons conducting business activity, legal persons or organisational units without legal personality, all the data which we process is taken from the Central Business Activity Register or the National Court Register, i.e. from publicly available sources. Article 45 (Clause 1) of the Act on Central Register and Information on Business Activity and Information Point for Entrepreneurs and Article 8 of the Act on the National Court Register classify the information contained in the aforementioned registers as non-confidential and establish that everyone has the right to access the data contained therein.

## **IV. Personal data of website users**

### **Purpose of processing personal data:**

Personal data which we process in the scope of the websites is processed in order to:

1. book hotel rooms in line with user's wishes;
2. process user's complaints and return of payments / benefits in case of withdrawal from the contract;
3. pursue and defend claims;
4. undertake marketing activities (only if appropriate consent is given), including in particular to send commercial information by electronic means to the e-mail address provided, under the Act of 18 July 2002 on the provision of services by electronic means (Journal of Laws of 9 September 2002, as amended) and other generally applicable regulations, and respond to users' inquiries addressed via the contact form;
5. administer the website,

### **Legal grounds for processing**

The legal grounds for the processing of this data comes from Article 6 (Clause 1) of the GDPR (the Regulation of the European Parliament and of the Council 2016/679 dated 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 on the repeal of Directive 95/46/EC (General Data Protection Regulation). As for issues related to the provision of hotel services by our company, the processing is required for the performance of a contract to which a given Data Subject is a party (a contract for the provision of hotel services) or to take action at the request of such a Data Subject prior to the conclusion of this contract.

Otherwise, personal data is processed for the purposes of (our or third-party's) legitimate interests or, as in the case of direct marketing by means of electronic communication channels or cookie files - based on this Data Subject's consent. This consent may be revoked at any time, while the processing which was conducted on the basis of consent prior to its revocation remains lawful.

### **Legitimate interest**

The Data Controller has a legitimate interest both in asserting its rights and in defending itself against unjustified claims made against the company. Any operations related to the assertion and defence against claims, as well as any related to building a brand, developing a customer base, creating a friendly atmosphere around your company are the key factors which support business performance, so as such are covered by Article 16 of the European Charter of Fundamental Rights.

## **Processing time**

Hotel Guests' Data is processed under the provision of our service and upon its completion during the period for pursuing claims. In case of giving a consent to the processing of personal data for direct marketing purposes via electronic means of communication, such processing personal data and the achievement of its purpose is not a process which can be completed within a specific period of time, so such data may be processed until a given Data Subject has revoked his or her consent or filed an objection.

## **Voluntary provision of personal data**

Providing personal data is voluntary, however a lack of your consent to our processing of personal data may prevent us from providing our services and making bookings at our Services / Websites, so this is one of the conditions to conclude an agreement for the provision of our hotel services.

## **Rights held by Data Subjects**

Any Website user, when we are provided with his or her data, has the right to inspect it, the right to request its update or, in certain situations, the right to object, to request the restriction of its processing, deletion or transfer.

## **Recipients of personal data**

A group of recipients of such Personal Data may include: the authorities, institutions and entities authorised under the law, as well as entities providing services to the Administrator / Controller (e.g. legal, IT, marketing, accountancy services and other entities participating in the provision of the services ordered).

As regards the Hilton Honors program and your use of DoubleTree by Hilton services provided globally (for example, accepting hotel bookings, providing services on behalf of Hilton Worldwide Holdings Inc., entering hotel guest details into IT systems, supporting Hilton Worldwide in its marketing activities), your data will be administered and controlled by Hilton Worldwide.

## **Processing of personal data beyond the EEA**

Hilton Worldwide also processes personal data beyond the EEA and the security of such data is ensured by means of standard contractual clauses. In this respect, FILM HOTEL sp. z o.o. acts as the Processor of your personal data on behalf of Hilton Worldwide. Details on the processing of personal data by Hilton Worldwide are set out in the Global Privacy Policy, which can be viewed at:

[https://hiltonhonors3.hilton.com/pl\\_PL/policy/global-privacy-statement/index.html#ContactUs](https://hiltonhonors3.hilton.com/pl_PL/policy/global-privacy-statement/index.html#ContactUs)

Any inquiries regarding this Declaration and the manner in which Hilton processes your personal data should be sent to the following e-mail address: [customer\\_privacy@hilton.com](mailto:customer_privacy@hilton.com) or the following postal address: Hilton Customer Privacy Protection, 7930 Jones Branch Drive, McLean, VA 22102, USA.

## **COOKIE files**

The Administrator, pursuant to the provisions of Articles 173 and 174 of the Telecommunications Law of 16 July 2004 (Journal of Laws of 16 July 2004, as amended), informs you that it implements - as part of its Websites / Services - the so-called "cookie" file technology.

When using / visiting the Websites / Systems, small files (especially text files) containing information required for the proper operation of the administrator's website, i.e. so-called cookie files are stored on a given user's terminal device (computer, smartphone, tablet, etc.). Thanks to saving these files on this user's device, it is possible, among others, to store login details, so that the user does not have to enter

them or adjust the content of page(s) to his/her interests every time. Cookie files are also used to collect statistical data about the Website / Service in order to adjust it to users' preferences.

These files are not harmful to any device in any manner and do not change its settings or settings of any software installed on it. The contents of these files can only be read by the server which generated them.

Cookie files can work only if a given user's browser accepts them and does not delete them from the disk. The user can delete or block cookies by changing the settings of his/her browser, which is used to visit our Websites. Most web browsers have cookies enabled by default.

On the first visit to the DoubleTree by Hilton Łódź website, a User is informed about the cookies technology. By staying on the website, he/she accepts the use of cookie files. If the browser settings are not changed by the user, it means that he/she consents to the use of "cookie" files.

### **Types of cookie files**

The Administrator / Controller makes use of two types of cookie files:

1. Session cookies: they are stored on the user's device and remain there until the end of a given browser session. After the session is over, the stored information is permanently deleted from the user's device memory.
2. Permanent cookies: they are stored on the user's device and remain there until they are deleted. The termination of a browser session or turning off the user's device does not delete them.

### **Purpose of collection of cookie files**

Information stored in cookie files on the computer makes the use of our Services / Websites easier for the user.

Cookies are used for the following purposes:

1. advertising (e.g. adjustment of product and service advertisements displayed through the Services / Websites);
2. statistics (e.g. generation of anonymous statistics which facilitates to understand how users of the Services / Websites make use of webpages under these Services / Websites, which in turn allows to improve their structure and content);
3. storage of information on visual and personalisation preferences, e.g. layout colour;
4. identification, including storage of basic information about users - their identifiers;
5. ensuring the optimisation and proper display of the content of the Services / Websites;
6. ensuring the best reception and adequacy of the content of the Services / Websites for their recipients;
7. conversion and tracking files which allow you to analyse the performance of various sales channels.

Apart from own cookies, third-party cookies, which are owned in particular by advertisers, adserver system operators and viewership analysis / reporting system operators, may be placed and used on the Services / Websites.

Third-party cookies are used for the following purposes:

1. Collection of statistical data on the popularity and usefulness of individual webpages on the Services / Websites or their elements;
2. Behavioural advertising displays - tailored to users' interests;

3. Creation of behavioural user profiles, in particular to avoid a multiple presentation of the same advertisement to the same recipient and to present behavioural advertisements taking into account their interests;
4. Technological support for third-party components, such as Adobe Flash or Facebook Connect.

### **Management of cookie files**

It is up to users to decide whether cookies are to be saved and stored on their device. Users can independently make all changes to their browser settings.

More information- Internet Explorer

More information - Chrome

More information i- Firefox

More information - Safari

Detailed information about the operation and manners of handling cookies is to be found in the settings and in the "Help" section at the web browser. However, it should be kept in mind that restrictions on the use of cookie files may hinder or prevent using this Service / Website.

### **Other technical information**

The site is provided with links and plugins to other sites. While browsing our website, the user's browser communicates with our Facebook fanpage. The Administrator / Controller also makes use of standard web server log files to count the number of visitors and to assess the Services / Website and their functionalities.

The Google Analytics cookie files which we use are used to compile website statistics provided by Google. All information generated by these cookies relates to making use of our Service / Website by users (including their IP address and computer's location on the Internet) and is transmitted to and stored by Google on servers in the United States. Google makes use of this information for assessing usage of the Service / Website, compiling reports on activities at the Website forwarded to its operators and providing other services relating to the Website and online operations. Google may also transfer this information to third parties if required to do so by law or where such third parties process this information on Google's behalf.

### **Recipients of personal data**

Below there are companies with whom we cooperate in the processing of information related to the cookie files technology:

1. Google LLC seated at 1600 Amphitheatre Parkway Mountain View, CA 94043 United States, which can process data beyond the EEA. A sufficient level of security has been demonstrated by the company by joining the Privacy Shield program, and more information on this topic can be found at: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active#dispute-resolution-1> and in the Google's privacy policy
2. Facebook, Inc. seated at 1601 Willow Road Menlo Park, California 94025, which may process data beyond the EEA. A sufficient level of security has been demonstrated by the company by joining the Privacy Shield program, and more information on this topic can be found at: <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active> and in the Facebook's privacy policy.

#### **DOUBLETREE BY HILTON ŁÓDŹ**

Film Hotel Sp. z o. o.

ul. Łąkowa 29, 90-554 Łódź

Tel +48 42 2088000, Fax +48 42 2088001

NIP: 7272750210 REGON: 100738406 KRS: 0000336343

lcjdl.res@hilton.com

[doubletreelodz.pl](https://doubletreelodz.pl) | [lodz.doubletree.com](https://lodz.doubletree.com)

## Period of time during which we use cookie files

Name of Cookie file	Expires upon (validity period)	Description of Cookie file
__utma	730 days	User ID - Google Analytics tracking service - used by most websites; a "persistent" cookie files, tracks a number of times a user has visited a given domain, when he / she visited it for the first and last time. It enables to determine a number of unique users (defined as a particular browser on a particular computer) who visit a given page.
__utmb	Expires upon 30 minutes of inactivity	Session ID - Google Analytics tracking service - used by most websites; when enabled it can calculate how long an individual visit lasts. __utmb retrieves a timestamp at the time when a given user enters a specific page, while utmc __ retrieves a timestamp at the time this user leaves this page. __utmb expires at the end of a given session. __utmc, waits for 30 minutes and then expires.
__utmc	At the end of a given session	
__utmz	182 days	Campaign ID - Google Analytics tracking service - used by most websites. __utmz keeps track of where a given visitor comes from, which search engine he/she uses, which links he/she clicked, which keywords he/she used and where he/she was when he/she accessed a given webpage. Its validity period expires after 15,768,000 seconds - or after 6 months.

## V. Behavioural marketing

Behavioural marketing is based on online search and enables brands to provide Internet users with advertisements in line with their interests.

Information which is used for behavioural marketing include anonymous statistical data derived from cookie files operated by a given advertising provider (e.g. Facebook or Google), and our processing of this information does not require the identification of a specific Data Subject. In the case of persons registered pursuant to the Terms and Conditions of social media services, e.g. Google+ or Facebook, this information may be extended to include information from the profiles of individual persons who have an account and have themselves disclosed it to Google or Facebook (e.g. search histories, interactions with other sites) and have allowed it to be passed on to third parties in the settings of an account for Google, Facebook or other web sites.

### Purpose of processing personal data

Personal data referring to persons to whom such marketing is addressed is processed in order to promote relevant materials, inform about issues dealt with in such programs, build positive relations and facilitate contact with the Administrator / Controller.

### Legal grounds for processing

Our legitimate interest is the legal basis for the processing of personal data for this purpose. It is based on the right to build positive relationships with our clients. This interest stays in line with the one of the wider community i.e. Internet users who receive advertisement messages anyway. When the content of advertisements is adapted to the interests of Internet users it leads both to the increase in effectiveness of marketing activities and also to the display of advertisements which better "meet the addressee's taste", so the benefit is mutual.

### Legitimate interest

Any operations related to building a brand, developing a customer base, creating a friendly atmosphere around your company are the key factors which support running business activities, so as such are covered by Article 16 of the European Charter of Fundamental Rights.

### **Recipients of personal data**

In order to ensure the highest possible level of security of information concerning the users of our Service / Website by complying with all the rules and codes of good practice of the online industry, on behalf of the Administrator / Controller, all activities related to the processing of data for the purposes of behavioural advertising may be entrusted to a professional advertising agency.

### **Period of time of data processing**

Due to their specific character related to achieving the purpose of data processing, cookie files and thus statistics derived from them can theoretically be stored for an indefinite period of time. However, from a practical point of view, such information processed for the purpose of behavioural marketing loses its usefulness upon a period of 1 to 3 months, so it is only used during this period.

The processing of personal information about specific users logged in on Google, Facebook or other sites takes place until they make adequate changes to the privacy settings of their profile on these sites.

### **Rights held by Data Subjects**

Users have the right to request from FILM HOTEL Sp. z o.o. access to their personal data, to rectify it and in justified cases to restrict its processing.

### **Processing not requiring identification**

Practically never does the processing of personal data at our website (except for the contact form) require the identification of a given Data Subject. FILM HOTEL Sp. z o.o. does not retain, obtain or process additional information in order to identify an individual person for the sole purpose of exercising his/her rights. In this case, Articles 15 to 20 of the GDPR do not apply.

### **Voluntary provision of personal data**

As previously stated, the use of the webpages administered by FILM HOTEL sp. z o.o. and therefore the use of cookie files is completely voluntary. The use of other sites (e.g. Google or Facebook), i.e. the disclosure of any information about oneself which is further used for behavioural marketing is also entirely voluntary and its scope depends solely on this user, way he/she uses the Internet, browser etc. as well as the privacy settings of other internet services.

## **VI. Fanpage <https://www.facebook.com/DoubleTreeLodz/>**

Data processed under administration of the fanpage includes - in the case of non-registered persons - anonymous statistical data. Our processing of this information does not require the identification of any Data Subject.

### **Purpose of processing personal data**

All personal data of persons who view, comment, like, visit or share the hotel fan-page or its individual elements (e.g. single posts) is processed in order to promote our materials, inform about issues related to our hotel, build positive relations and facilitates contact with the Administrator.



## **Legal grounds**

Article 6 (Clause 1, Item f) of the GDPR being the Administrator's / Controller's legitimate interest constitutes the legal grounds for the processing of personal data in the scope of running the fanpage (including organisation of events and competitions)

Such personal data is collected solely for the purposes of building a friendly atmosphere around the company, including the organisation of various events and competitions, i.e. the fulfilment of the Administrator's / Controller's legitimate interest and the implementation of any legal regulations which may be associated with it. Also, Article 6 (Clause 1, Item c) of the GDPR is the legal basis in some cases.

## **Specification of legitimate interest**

The Administrator / Controller has a legitimate interest in building positive relations with its recipients. This interest is in line with the one of the wider community, i.e. people who have already made use of the Administrator's / Controller's services and may want to use them in the future, especially as the Administrator / Controller also sends (on the fan-page) information on the special offers which are more attractive to potential customers than standard ones. Any operations related to building a brand, creating a friendly atmosphere around the company are the key factors which support running business activities, so as such are covered by Article 16 of the European Charter of Fundamental Rights.

## **Data sources**

As for people registered in line with the Facebook Terms of Service, this information is extended with links to the profiles of people who, having an account, got interacted with the fanpage themselves. Thus, both fanpage users themselves and Facebook can be the source of such information.

## **Recipients of personal data**

In order to ensure the highest possible level of security of information concerning the users of our fanpage by complying with all the rules and codes of good practice of the Internet sector, on behalf of the Administrator / Controller, all activities related to the processing of data for the purposes of running the fanpage may be entrusted to a professional advertising agency.

In the case of participants of competitions, when the value of prizes qualifies them for tax, the tax chamber will also have access to such data.

## **Information which may be transferred to a third country**

Information about users' interaction with our fanpage and how they interact with it may therefore also be processed by Facebook, Inc. seated in 1601 Willow Road Menlo Park, California 94025, which may process data beyond the EEA. A sufficient level of security has been demonstrated by the company by joining the Privacy Shield program, and more information on this topic can be found at: <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active> and in the Facebook's privacy policy.

## **Period of time for which we store personal data**

Due to their specific character related to achieving the purpose of data processing, cookie files, and thus statistics derived from them can be stored for an indefinite period of time.

The processing of personal information concerning specific logged-in users takes place until they withdraw from interaction with the fanpage, make adequate changes in the privacy settings of their profile or until the Administrator / Controller removes them, e.g. from the group of fans.

Data on participants in competitions is stored only until the end of a given competition, the winner is selected and the prize is granted. In the case of participants of competitions, when the value of prizes qualifies them for tax, the adequacy of collection of additional data stays in line with fiscal regulations.

### **Rights held by Data Subjects**

Users have the right to request from the Administrator / Controller access to their personal data, to rectify it and, in justified cases, to restrict its processing, to file an objection and to demand its removal.

### **Processing not requiring identification**

When the processing of personal data does not require the identification of any Data Subject, FILM HOTEL Sp. z o.o. does not retain, obtain or process additional information in order to identify a person for the sole purpose of exercising his/her rights. In this case, Articles 15 to 20 of the GDPR do not apply.

### **Voluntary provision of personal data**

The use of the fanpage, i.e. the disclosure of any information about a given user is entirely voluntary and depends solely on this user, his/her manner of using the fanpage and the privacy settings of his/her profile.

In some cases, the adequacy of collection of additional details on competition winners results from Article 30 (Clause 1, Item 2) and Article 21 (Clause 1, Item 68) of the Act on PIT.

## **VII. Monitoring**

### **Purpose of processing CCTV monitored data**

CCTV monitoring provided at the premises of FILM HOTEL Sp. z o.o. aims to register and monitor any incidents which pose a threat to persons and property, to detect and register offences and crimes.

### **Legal grounds**

Article 6 (Clause 1, Item f) of the GDPR forms the legal grounds for the processing of personal data in this case.

### **Specification of legitimate interest**

The Administrator / Controller has a legitimate interest in providing physical security to any persons on its premises. This interest stays in line with the one of the wider community i.e. persons at the Administrator / Controller's premises and is covered by the European Charter of Fundamental Rights (the 'Charter') and the European Convention on Human Rights ('ECHR'), e.g. the right of freedom and security (Article 6 of the Charter and Article 5 of the ECHR) or the right of ownership (Article 17 of the Charter and Article 1 of Protocol No. to the ECHR).

### **Who do we share monitoring recordings with?**

Monitoring data may be disclosed to other entities (e.g. the Police) on the basis of separate legal regulations, as well as to entities acting on our behalf, e.g. a security company.

## **How long do we store monitoring data?**

Monitoring details are stored for up to 30 days.

## **Rights held by persons recorded by the monitoring system**

Any person recorded by the monitoring system has the right to access his/her personal data as long as it does not infringe the rights and freedoms of other persons. The transfer of any recording to a private person can therefore only take place if he or she is the subject of such processing and this transfer does not lead to the disclosure of other persons' data.

## **Disclosure of monitoring data:**

When a person makes a request to check who has committed any act which have resulted in damage to this person, this person is asked to report a criminal offence / crime (suspicion of committing a criminal offence / crime), for example, to the police or the prosecutor's office. Recordings may be provided only at the request of such authorities / bodies, if they consider such disclosure to be justified.

## **VIII. Useful contact details**

### **Personal Data Controller**

FILM HOTEL Sp. z o. o. seated in Łódź at 29 Łąkowa Street.

### **Data Protection Officer**

We have appointed our Data Protection Officer: Mr. Przemysław Siembida, who can be contacted by Data Subjects in any issues on the protection of personal data via e-mail: [iod@doubletreelodz.pl](mailto:iod@doubletreelodz.pl).

### **Personal Data Protection Office**

Data subjects have the right to lodge a complaint with the supervisory authority in the case of unsatisfactory settlement of any case by the Personal Data Administrator / Controller.

### **Marketing Department at FILM HOTEL sp. z o.o.**

In case of any doubts related to the Privacy Policy, do not hesitate to contact the Marketing Department via: e-mail address: [marketing@doubletreelodz.pl](mailto:marketing@doubletreelodz.pl), by telephone: +48 42 208 80 56, or to our mailing address: *Dział Marketingu FILM HOTEL Sp. z o.o. ul. Łąkowa 29, 90-554 Łódź.*

## **IX. External links**

For more information on how cookies work and what they are used for, please visit the IAB Poland Internet Industry Employers' Association website: [www.wszystkoociasteczkach.pl](http://www.wszystkoociasteczkach.pl).

To change your behavioural marketing settings, please visit:

<http://www.youronlinechoices.com/pl/twojwybory>.

The companies listed in the link belong to the group of suppliers who cooperate with website publishers in the collection and processing of personal information and provide online behavioural advertising.

You can use the buttons provided to change your behavioural advertising settings. You can enable or disable all the companies or change any settings for each of them. By clicking the 'i' button, you can learn more about any of the companies as well as the settings of behavioural advertising in the web browser which you use.

To determine the level of your online privacy, you can also use browser settings or add-ons provided by its manufacturer, e.g.:

Mozilla: <https://support.mozilla.org/pl/kb/jak-zatrzymac-sledzenie-przez-strony-internetowe>

or from the tools prepared by companies gathering information about us:

<https://support.google.com/chrome/answer/2790761?co=GENIE.Platform%3DDesktop&hl=pl&oco=1>

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lcjdl.res@hilton.com

[doubletreelodz.pl](https://doubletreelodz.pl) | [lodz.doubletree.com](https://lodz.doubletree.com)