

## PERSONAL DATA PROCESSING POLICY (PRIVACY POLICY)

### River Style Hotel & SPA Based in Reda at Pucka 10B street

This Personal Data Processing Policy (Privacy Policy) is an information document and does not replace the applicable Security Policy, it contains information on the processing by the Administrator of personal data of persons visiting the headquarters or using the services provided by FENIKS Sp. z o. o. street Waryńskiego 46a/1, Gdańsk 80-242 – River Style Hotel & SPA based in Reda at ul. Pucka 10B, hereinafter referred to as the "Company" or "Administrator".

River Style Hotel & SPA based in Reda pays special attention to the highest standards of service for its clients (guests), including their safety, respect for their privacy and protection of personal data, therefore it provides this Privacy Policy so that every user can read it with information to what extent your personal data is processed, including so that each of you can freely, independently and consciously decide whether to use the services we provide.

This Privacy Policy describes how and to what extent personal data is collected, for what purposes it is used, to whom it is made available and how it is protected. There is also information about the rights of data subjects in accordance with applicable personal data protection regulations (GDPR).

#### 1. DEFINITIONS

- 1.1 **Administrator** – FENIKS Sp. z o.o. Waryńskiego 46a/1 street, Gdańsk 80-242 in River Style Hotel & SPA based in Reda at Pucka 10B street, represented by the President of the Company's Management Board.
- 1.2 **Personal Data Protection Inspector (IODO)** - a person appointed by the Data Administrator, responsible for the system organization and supervision of compliance with information security and protection of personal data processed, collected and stored in the IT System and in traditional (paper) form.;
- 1.3 **"Personal data"** - means any information relating to an identified or identifiable natural person ("data subject") who can be identified, directly or indirectly, and unambiguously identified; in particular on the basis of an identifier such as a name and surname, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of a natural person; including its image, voice recording, contact details, information contained in correspondence, information collected through recording equipment or other similar technology.
- 1.4 **Data subject** - a natural person whose personal data is processed by Administrator.
- 1.5 **Policy** – this personal data processing policy.
- 1.6 **GDPR** - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (OJ EU L No. 119) 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 (called GDPR).

## 2. CONTACT WITH THE ADMINISTRATOR

- 2.1 Pursuant to Art. 13 section 1 and 2 of the Regulation of the European Parliament and of the Council (EU), we inform you: The administrator of your personal data is FENIKS Sp. z o. o. based in Gdańsk at ul. Waryńskiego 46a/1 in the River Style Hotel & SPA in Reda at ul. Pucka 10B represented by the President of the Company's Management Board, e-mail address: [hotel@hotelriverstyle.pl](mailto:hotel@hotelriverstyle.pl), tel. T: **+48 58 73 64 800** or via the correspondence address indicated in point 1.1.
- 2.2 The Data Administrator, in accordance with Article 37 of the GDPR, has appointed a Personal Data Protection Inspector with whom you can contact in all matters relating to the processing of your personal data, as well as the exercise of your rights related to their processing. Contact with the Personal Data Protection Officer of River Style Hotel & SPA; e-mail: [iodo@hotelriverstyle.pl](mailto:iodo@hotelriverstyle.pl) or in writing to the correspondence address with the note "Data Protection Inspector".

## 3. DATA PROCESSING BY THE ADMINISTRATOR

- 3.1 In connection with its business activities, the Administrator collects and processes Personal Data in accordance with the applicable legal provisions, in particular the GDPR and the data processing principles provided for therein.
- 3.2 The Administrator ensures transparency of Personal Data processing, informs about data processing at the time of collection, including the purpose and legal basis of processing (e.g. when concluding a contract, cooperation or services provided, handling the complaint process, contact via the contact form, issuing accounting documents, direct marketing). The Administrator ensures that Personal Data is collected only to the extent necessary to achieve the indicated purpose and processed only for the period for which it is necessary and legally justified.
- 3.3 When processing Personal Data, the Administrator ensures their security and confidentiality as well as access to information about processing to data subjects. If, despite the security measures in place, a breach of Personal Data protection occurred (e.g.
- 3.4 "unauthorized access or disclosure" of data or their loss), the Administrator will inform Data Subjects about such an event and will take appropriate actions in a manner consistent with the provisions of the GDPR.
- 3.5 Your personal data is not subject to automated decision-making in relation to the purposes for which it was collected, including profiling.
- 3.6 Your personal data will not be transferred to third countries or international organizations.

## 4. SECURITY OF PERSONAL DATA

- 4.1 In order to ensure the integrity and confidentiality of data, the Administrator has implemented appropriate organizational and technical measures and procedures enabling access to Personal Data only to authorized persons and only to the extent necessary due to the tasks they perform in their position. The Administrator uses organizational and technical solutions to ensure high standards of security of processed and stored personal data.
- 4.2 The Administrator also takes all necessary actions to ensure that its subcontractors and other cooperating entities (e.g. operating reservation software and other specialized software) guarantee the use of appropriate security measures whenever they process Personal Data at the request of the Data Administrator..

The Administrator conducts an ongoing analysis of the risks associated with the processing of Personal Data and monitors the adequacy of the data security measures used to the identified threats. If necessary, the Administrator implements additional measures and activities to increase data security, including adapting these measures and activities, as necessary, to legal changes or new technologies.

## 5. PURPOSES AND LEGAL BASIS OF PROCESSING

- 5.1 In the case of sending correspondence to the Administrator via e-mail or traditional mail that is not related to the services provided to the sender, another contract concluded with the sender or otherwise unrelated to any relationship with the Administrator, the Personal Data contained in this correspondence are processed solely for the purposes of communication and resolving the matter to which the correspondence relates.
- 5.2 The Administrator only processes Personal Data that is relevant to the given case described in the correspondence. All correspondence is stored in a manner that ensures the security of the Personal Data contained therein (and other significant information) and disclosed only to persons authorized for this purpose. The legal basis for processing in this case is the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR).
- 5.3 If you contact the Administrator by phone, in matters unrelated to the concluded contract or the services provided, the Administrator may request Personal Data when it is necessary to handle the matter to which the contact relates. In such a case, the legal basis is the legitimate interest of the Administrator (Article 6 section 1 letter f GDPR), consisting in the need to resolve a reported matter related to his business activity or a concluded contract.
- 5.4 Telephone conversations may be recorded - in such a case, appropriate information is provided to the individual at the beginning of the conversation. Conversations may be recorded in order to protect the Administrator's rights against possible claims and to ensure the highest standards of service.
- 5.5 Due to the need to ensure the safety of persons and property, the Administrator uses video monitoring and controls access to the River Style Hotel in Reda and the area managed by it. The data collected in this way is not used for any purposes other than those described below.
- 5.6 Personal data in the form of monitoring recordings are processed to ensure the safety of persons and property and to maintain order on the premises of the Administrator, as well as to defend against claims made against the Administrator or to establish and pursue claims by the Administrator. The legal basis for the processing of personal data is the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR), consisting in ensuring the safety of persons and property located in the area managed by the Administrator and the protection of his rights.
- 5.7 The area covered by video monitoring by the Administrator is marked with appropriate graphic signs, relevant information on the processing of personal data in the video monitoring system is available at the reception desks and on the website of the River Style & SPA Hotel.
- 5.8 The monitoring recordings referred to above are stored for a period of up to 14 days from the date of recording, and then they are deleted by overwriting new recordings on the digital recorder. If the recordings constitute evidence in proceedings conducted pursuant to the law or the Administrator has received information that they may constitute evidence in the proceedings, the deadline for storing the recordings is extended until the final conclusion of the proceedings conducted by the authorized bodies. Recordings in the form of evidence may be made available only to authorized authorities in the scope of proceedings conducted by them.
- 5.9 As part of the concluded contracts to which you and FENIKS Sp. are parties. z o. o. street Waryńskiego 46a/1, Gdańsk 80-242 in River Style Hotel & SPA based in Reda at ul. Pucka 10B, which means that data processing is necessary to perform the contract, the legal basis for the processing of your personal data is Art. 6 section 1 letter b) GDPR, as well as art. 6 section 1 letter c) GDPR in connection with joke. 74 section 2 point 4 of the Accounting Act, which means that processing is necessary to fulfill the legal obligation imposed on the Administrator, i.e. storing settlement and accounting documents. Appropriate provisions on the processing of personal data will also be included in the contract concluded between the parties
- 5.10 As part of cooperation with subcontractors on the basis of the contract concluded in this matter, the Administrator informs Subcontractors that personal data of representatives, employees and associates of the party with whom the contract is concluded, which will be transferred in connection with the signed contract and as part of business relations, in particular for the purposes of enabling contacts between the parties, are processed in accordance with the GDPR. In such a case, the legal basis is the legitimate interest of the Administrator (Article 6(1)(b) and (f) of the GDPR), consisting in the need to maintain contact between the parties to contracts in

connection with his business activity.

- 5.11 If you subscribe to the River Style & SPA Hotel's newsletter in order to track promotions and special offers, you consent to receiving promotional and marketing offers from the Hotel. Your personal data will be processed for the purpose of providing the newsletter sending service, pursuant to Art. 6 section 1 letter f) GDPR, the legitimate interest of the Administrator - direct marketing of products and services provided. Providing data is voluntary, but necessary to achieve the purpose - providing the newsletter service. The recipients of personal data are entities providing hosting, IT service or newsletter shipping services, as well as entities authorized to receive data on the basis of legal provisions. You may opt out of the above at any time by sending appropriate information to the e-mail address of the Data Administrator.
- 5.12 As part of the recruitment processes, the Administrator expects the transfer of Personal Data (CV or personal questionnaire) only to the extent specified in the provisions of labor law. Therefore, information should not be provided in a broader scope. If the submitted applications contain additional data going beyond the scope specified in the provisions of labor law (Labor Code), their processing will be based on the candidate's consent (Article 6(1)(a) of the GDPR), expressed through a clear confirmatory action taken by is for the candidate to send application documents. If the submitted applications contain information that is inappropriate for the purpose of recruitment, it will not be used or taken into account in the recruitment process.
- 5.13 Personal data in the recruitment process are processed:
- if the preferred form of employment is an employment contract - in order to fulfill the obligations arising from legal provisions related to the employment process, primarily the Labor Code - the legal basis for processing is the legal obligation imposed on the Administrator (Article 6(1)(a) c GDPR in connection with labor law provisions);
  - in order to carry out the recruitment process regarding data not required by law or by the Administrator, as well as for the purposes of future recruitment processes - the legal basis for processing is consent (Article 6(1)(a) of the GDPR);
  - in order to verify the qualifications and skills of the applicant and determine the terms of cooperation - the legal basis for data processing is the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR). The legitimate interest of the Administrator is to verify job candidates and determine the conditions of possible cooperation;
  - in order for the Administrator to establish or pursue possible claims or defend against claims made against him - the legal basis for data processing is the legitimate interest of the Administrator (Article 6(1)(f) of the GDPR)
- 5.14 In most cases, the processing of personal data results from legal provisions, and their provision is obligatory (mandatory). In some cases, providing personal data may be voluntary, but necessary to achieve the expected purposes. Failure to provide or providing incomplete personal data may result in the inability to perform the contract or service or in leaving the submitted letter or application without consideration.
- 5.15 To the extent that Personal Data are processed by the Administrator on the basis of the consent of the data subject, we would like to inform you that this consent may be withdrawn at any time, without affecting the lawfulness of the processing carried out before its withdrawal. In case of consent for the purposes of future recruitment processes, personal data voluntarily withdrawn are deleted after one year from the date of their submission - unless prior consent has been given.

## 6. DATA RECIPIENTS

- 6.1 In connection with running a business requiring processing, Personal Data may be made available to external entities (processors), in particular suppliers responsible for operating IT systems and equipment (e.g. CCTV equipment for video monitoring), companies providing reservation software (hotel rooms , bowling, swimming pool, SPA) courier companies, companies supporting the Administrator in the field of legal and advisory assistance, providing auditing, health and safety, financial and accounting services, while maintaining an appropriate level of security of transferred

data and GDPR regulations.

- 6.2 The Administrator reserves the right to disclose selected information regarding the Data Subject to competent authorities, services or third parties who request such information only if the law clearly indicates and imposes such an obligation on the Administrator, while maintaining an appropriate level of security of the transferred data.

## **7. PERSONAL DATA PROCESSING PERIOD**

- 7.1 The period of data processing by the Administrator depends on the type of service provided, the concluded contract and the purpose of processing. The data processing period may also result from regulations (e.g. tax, settlement and financial regulations, or registration regulations) when they constitute the basis for processing. In the case of data processing on the basis of the legitimate interest of the Administrator (e.g. for security reasons), the data is processed for a period enabling the implementation of this interest or until an effective objection to the processing of this data is submitted. If the processing is based on consent, the data is processed until it is withdrawn. When the basis for processing is the necessity to conclude and perform a contract, the data is processed until its termination, completion and then archived in accordance with the provisions of law in this regard.
- 7.2 The data processing period may be extended if the processing is necessary to establish or pursue claims or defend against claims, and after this period - only if and to the extent required by law.

## **8. RIGHTS RELATED TO THE PROCESSING OF PERSONAL DATA**

8.1 Data subjects have the following rights:

- the right to access data and information about the processing of personal data - on this basis, the Administrator provides the natural person submitting the request with information about the processing of his or her data, including the purposes and legal basis for processing, the scope of data held, the entities to which it is disclosed, as well as the planned the date of deletion of this data;
- the right to obtain a copy of the data - on this basis, the Administrator provides a copy of processed data relating to the natural person submitting the request;
- the right to rectification - the Administrator is obliged to remove any inconsistencies or errors in the processed Personal Data and supplement them if they are incomplete or outdated;



- the right to delete data (right to be forgotten) - on this basis you can request the deletion of data whose processing is no longer necessary to achieve any of the purposes for which they were collected;
- the right to limit processing - if such a request is made, the Administrator ceases to perform operations on Personal Data - except for operations to which the data subject has consented - and to store them, in accordance with the adopted retention principles or until the reasons for limiting data processing cease to exist. (e.g. a decision of the supervisory authority will be issued authorizing further data processing);
- the right to transfer data - on this basis - to the extent that the data is processed in an automated manner in connection with the concluded contract or consent - the Administrator issues the data provided by the person to whom they concern in a format allowing the data to be read by a computer. It is also possible to request that this data be sent to another entity, however, provided that there are technical possibilities in this respect both on the part of the Administrator and the indicated entity, such a case applies by transferring data of people booking their stay at the River Style Hotel & SPA in Reda through booking platforms, i.e. Booking.com, TripAdvisor.pl, Hotels.com, Trivago.pl and other cooperating companies.
- the right to object to the processing of data for marketing purposes - the data subject may at any time object to the processing of Personal Data for marketing purposes, without the need to justify such objection;
- the right to object to other purposes of data processing - The data subject may at any time object - for reasons related to his particular situation - to the processing of Personal Data which is carried out on the basis of the legitimate interest of the Administrator (e.g. for analytical or statistical purposes or for reasons related to property protection); objections in this respect should include justification;
- the right to withdraw consent - if data are processed on the basis of expressed consent, the Data Subject has the right to withdraw it at any time by notifying the Administrator (e.g. by e-mail: or by post, which, however, does not affect the lawfulness of the processing carried out before its withdrawal ; failure to grant or withdraw consent does not have any adverse consequences for the Data Subject;
- the right to complain - if you become aware of unlawful processing of your personal data by the Administrator, you have the right to lodge a complaint with the supervisory authority competent in matters of personal data protection, i.e. the President of the Personal Data Protection Office, 00-193 Warszawa ul. Rates 2.

## **9. SUBMITTING REQUESTS RELATED TO THE EXERCISE OF RIGHTS**

- 9.1 A request regarding the exercise of the rights of Data Subjects may be submitted: in writing to the correspondence address indicated in point 1.1 above or electronically to the Personal Data Protection Inspector at the e-mail address: [iodo@hotelriverstyle.pl](mailto:iodo@hotelriverstyle.pl)
- 9.2 If the Administrator is unable to identify a natural person based on the submitted request, he will ask the applicant for additional information. Providing such data is not obligatory, but failure to provide them will result in refusal to fulfill the submitted request.
- 9.3 A response to the notification should be provided within 30 days of its receipt. If it is necessary to extend this deadline, the Administrator informs the applicant about the reasons for such action.
- 9.4 In the case where the request was sent to the Administrator electronically, the response is provided in the same form, unless the applicant requested a response in another form indicated by him/her. In other cases, the answer is provided in writing. If the deadline for fulfilling the request makes it impossible to respond by mail in writing, and the scope of the applicant's data processed by the Administrator allows contact by electronic means, the Administrator will respond electronically.

## **10. SYSTEM LOGS, TECHNICAL DATA**

- 10.1 For statistical purposes, the Administrator may obtain information about the use of websites by users using the system logs of the Administrator's servers. Collected include: the following information: date of connection, IP address, URL of the page visited, type of operating system, type of browser.

## 11. COOKIES POLICY

- 11.1 The Administrator may collect information obtained automatically - system logs (so-called event registers), containing in particular public IP addresses of users visiting the Administrator's website. System logs may be used by the Administrator for statistical purposes. Collective summaries in the form of statistics do not contain any features identifying users visiting the website www.
- 11.2 Pursuant to the provisions of Art. 173-174 of the Act of July 16, 2004, Telecommunications Law, the Administrator informs about the use of cookies, which are used to collect information regarding the use of the website by users <https://www.hotelriverstyle.pl/>
- 11.3 The Website uses cookies - text files stored on the user's end device and used to use websites.
- 11.4 The purpose of using cookies by the Website is:
- a) creating analyses, reports and statistics on how users use the Website pages,
  - b) adapting the content of the Website to the user's preferences and optimizing the use of the Website,
- 11.5 Only anonymous statistical data about users is collected using cookie technology. The information obtained thanks to cookies is not assigned to a specific person and does not allow him to be identified.
- 11.6 When visiting the Website, at least one cookie is sent to the user's end device to uniquely identify the browser. Information sent by the user's browser is automatically recorded by the Website.
- 11.7 Cookies may also be placed and used by IT partners cooperating with the Administrator.
- 11.8 Cookies, the information they store and accessing this information do not cause any configuration changes on the user's end device.
- 11.9 The User may change the settings in his browser or disable cookies at any time, but this may result in incorrect functioning of the Website.
- 11.10 If the user does not change the default settings of the web browser regarding cookies, these files will be placed on the end device and will be used in accordance with the rules specified by the web browser provider.
- 11.11 Information on how to manage cookies in individual browsers - including, in particular, instructions on blocking the receipt of cookies - can be found on the pages dedicated to individual browsers:
- a) Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
  - b) Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>
  - c) Internet Explorer: <https://support.microsoft.com/pl-pl/help/17442/windows-internet-explorer-delete-manage-cookies>

- d) Opera: <http://help.opera.com/Linux/12.10/pl/cookies.html>
  - e) Safari: <https://support.apple.com/pl-pl/HT201265>
- 11.12 Users who, after reading the information available on the Website, do not want cookies to remain saved in the device's web browser, should delete them from their browser after completing their visit to the Website.

The Administrator reserves the right to change this policy in connection with changes in regulations law or organizational and technical changes.