

## PRIVACY POLICY

Hotel Swing Spółka z o.o. based in Krakow undertakes to respect your privacy by making every effort to properly protect the personal data entrusted to us.

### INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA

Dear Sirs,

In accordance with the provisions of the General Data Protection Regulation of April 27, 2016 (hereinafter referred to as "GDPR"), we provide you with information on the processing of personal data of guests and customers of the Hotel Swing:

#### 1. Personal data administrator:

The administrator of your personal data is Hotel Swing Spółka z ograniczoną odpowiedzialnością with its seat in Krakow (hereinafter referred to as the "Hotel"), address: ul. Dobrego Pasterza 124, 31-416 Kraków, phone: 12 311 11 11, e-mail: hotelswing@hotelswing.pl.

If you use the booking of Hotel Swing services through other Entities, these Entities will also process your personal data as Separate Administrators. Each of these entities has its own privacy policy and therefore we encourage you to read it in order to obtain information on the level of security of the processing of your personal data.

#### 2. Inspector of Personal Data Protection:

The hotel has appointed a Personal Data Protection Officer, whom you can contact in case of any questions or comments regarding the processing of your personal data and your rights under the provisions on the protection of personal data.

IOD: Elżbieta Kruk, contact details e-mail: inspektor@hotelswing.pl.

#### 3. Purposes of personal data processing:

The Hotel may process your personal data in order to fulfill the obligations and rights as part of the provision of its services, at the stage of booking and concluding and performing contracts;

- pursuant to Art. 6 sec. 1 lit. B GDPR, e.g. for the purpose of:
  - for the provision of accommodation facilities along with the agreed related services,  
**For these services, the hotel processes the basic scope of personal data, including:**  
name and surname, address, PESEL number, and in the case of foreign guests, the number of the document confirming the identity, in the case of business accommodation, the business ID - i.e. data from the business ID card or other document indicating professional qualifications, company name, tax identification number (if applicable), date and scope of services.
  - on the implementation of catering services,
  - on the implementation of special events,
  - providing conference and training rooms,
  - on the implementation of other services.
- pursuant to Art. 6 sec. 1 lit. f GDPR, in order to:
  - to ensure the safety of people and property, video surveillance is used in all public zones inside the facility and in its immediate vicinity;

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- to establish and pursue possible claims (for this purpose, the following data are processed: name and surname, address, personal identification number, and in the case of foreign guests, the identification number from the document confirming identity;
- pursuant to Art. 6 sec. 1 lit. a GDPR, for the purposes of:
  - marketing, information, selection of an adequate package of promotional services with your voluntary consent.

#### 4. Legal basis for processing and the obligation to provide data:

The hotel may process your data:

- in connection with your actions aimed at concluding a contract, based on the concluded contract, on the provisions of the Act on hotel services and the services of tour leaders and tourist guides, the Civil Code and other applicable legal acts regulating the principles of providing hotel services and other services being the subject of the contract, as well as on the basis of applicable accounting regulations and keeping tax documentation.
- based on Article. 6 sec. 1 lit. b and lit. c GDPR.
- in connection with the possible need to establish and pursue claims, for the purposes of ensuring the safety of persons and property - video monitoring, pursuant to art. 6 sec. 1 lit. f GDPR.

Providing data is voluntary, but failure to provide the necessary personal data will prevent you from using the Hotel's services.

#### 5. Information on the categories of recipients of personal data:

Your personal data may be shared with:

- Hotel employees and associates who are authorized to process personal data in connection with the necessity to perform their official duties,
- entities intermediating in communication, booking Hotel services based on your instructions;
- entities acting on behalf of the Hotel or cooperating with the Hotel in the area of offering you services provided according to your choices: inter alia: Swing Sp. z o. o. with headquarters in Krakow in the field of SPA services; Water Park in Krakow S.A. in the scope of the services it offers, with the proviso that in the area of services provided by Park Wodny w Krakowie S.A. acts as a separate Administrator of your personal data due to separate legal provisions, procedures and policies - to which we refer you before using them (access possible at [www.parkwodny.pl](http://www.parkwodny.pl)).
- suppliers of technical and organizational services for the Hotel to the extent necessary for their implementation, but only as part of authorizations or assignments (in particular suppliers and entities specialized in providing technical maintenance of ICT systems, monitoring system);
- payment service providers cooperating with PDC and in connection with your choice of electronic payment method (in the scope of data necessary to perform these services and to the extent strictly defined by law);
- entities authorized under the provisions of law.

#### 6. Transfer of personal data to a third country or an international organization:

The hotel does not intend to transfer your personal data to recipients located outside the European Economic Area (European Union countries and Iceland, Norway and Liechtenstein).

If you use the Hotel's services with the help of Intermediaries and contact the Hotel via communication channels (e.g. Live chat, Facebook), your personal data may be processed in third countries. The Administrator hereby proposes to verify the procedures and privacy policies of service providers in this respect each time.

#### 7. The period for which personal data will be stored:

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The hotel will process your personal data for the time necessary to provide the services you have selected in accordance with the contract and will store your personal data for the period required by law for archiving purposes and possible settlement of mutual claims.

Data processed as part of monitoring are automatically overwritten and stored for up to 7 days, after which they are deleted, subject to situations requiring investigation, due to incidents of violation of the safety of persons and property. For such exceptional situations, the processing of monitoring data will take place adequately to the circumstances and legal requirements.

**8. Minimization of the scope of personal data:**

The administrator takes all adequate measures and actions to make sure that the scope of personal data he processes is safe and adequate for the purposes pursued and indicated in this Policy.

**9. Rights of the person whose data is processed:**

You have the right to access your data and the right to rectify incorrect data, supplement incomplete data, delete data - after the expiry of the storage period required by law, processing restrictions and the right to transfer data provided to the Hotel.

In the case of processing personal data on the basis of the legitimate interest of the Administrator pursuant to art. 6 section 1 letter f) - you have the right to object to the processing of personal data.

You have the right to lodge a complaint with the supervisory body (the President of the Personal Data Protection Office).

**10. Information on automated decision making:**

At the hotel, you will not be subject to decisions made in an automated manner (without human intervention) and your personal data will not be used for profiling without prior consent, e.g. regarding the determination of an adequate service package.

The scope of profiling may be carried out in relation to your personal data by intermediaries and entities offering communication channels based on your choice and decision - as to how to use them.

**11. The website at [www.hotelswing.pl](http://www.hotelswing.pl) uses the so-called "Cookies".**

For this scope and communication via the website, a separate policy content is defined - website and cookies policy - [www.hotelswing.pl](http://www.hotelswing.pl).

**12. Consent to the processing of personal data for the purpose of directing marketing and promotional offers.**

After voluntarily subscribing to the newsletter on the website [www.hotelswing.pl](http://www.hotelswing.pl) and expressing consent to the processing of personal data, you will periodically receive a message to the e-mail address provided with offers and information about current events and promotions. Withdrawal of consent will be possible at any time. The request to withdraw consent may be sent to the following address: [marketing@hotelswing.pl](mailto:marketing@hotelswing.pl).

**13. Processing of personal data in the process of providing services paid for Tourist Vouchers - pursuant to the Act of July 15, 2020 on the Polish Tourist Voucher (as amended).**

Due to the possibility for Customers to make payments in the form of travel vouchers for services provided at the Swing Hotel, as an authorized entity in this regard and being ADO, personal data of the Customer who is the legal guardian of the child will be processed for this purpose (including: first name and surname, PESEL, data on the scope of selected services) and personal data of the child (including name and surname, voucher number, voucher authorization code, scope of settlement, use of the voucher) to the extent described in detail in the registration card, available for filling in at the Reception Hotel.

These data will be processed by the Hotel (as ADO)

- based on Article. 6 (1) (b) of the GDPR due to the provision of services;

- under an agreement with the Customer pursuant to Article 6 (1) (c) of the GDPR due to the requirements of the Polish Tourist Voucher Act, and
- based on Article. 6 (1) (f) of the GDPR in the legitimate interest of ADO, in connection with the need to demonstrate diligence and reliability in the described process, as well as with possible determination, investigation and defense of claims.

The time of personal data processing in this process will be determined by the legal requirements specified for this specificity in order to settle the scope with ADO by authorized institutions, monitor, carry out any checks with ADO, archive documentation (personal data storage time up to 5 years).

**The hotel reserves the right to make changes to the Privacy Policy, therefore we encourage you to periodically check the content, in particular before making a reservation at the Hotel.**

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