

PRIVACY POLICY FOR CONTRACTORS

The purpose of this Policy is to provide information on the rules for the processing of personal data of the Administrator's contractors who are natural persons, including those engaged in business activities and contact persons obtained from our contractors, whose data will be provided by Contractors to the Administrator in connection with the desire to establish cooperation or the performance of contracts between the Administrator and Contractors.

GENERAL INFORMATION CLAUSE

Pursuant to Art. 13 sec. 1-2 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 (general regulation on the protection of data) (Journal of Laws UE L 119, p. 1) - hereinafter referred to as GDPR - we would like to inform you that:

I. Personal data administrator

The administrator of your personal data is Hotel Swing Sp. z o.o., with its headquarter in Krakow (31-231), ul. Dobrego Pasterza 124, 31-416 Kraków, (hereinafter referred to as the "Administrator"), telephone: 12 311 11 11, e-mail: hotelswing@hotelswing.pl.

Hotel Swing Sp. z o.o. appointed the Personal Data Protection Inspector, whom you can contact in case of any questions or comments regarding the processing of personal data and your rights under the provisions on the protection of personal data. Contact details of the Inspector - e-mail address: inspektor@hotelswing.pl.

II. Purposes and basics of processing

The administrator will obtain your personal data directly in connection with the desire to conclude or conclude contracts, including in particular contracts for the provision of outsourcing services in the field of business support and enterprise management.

When processing your personal data for the purposes described in this Policy, the Administrator may rely on one or more of the following legal bases, depending on the circumstances:

a) in particular in the field of: your personal data (as a Contractor who is a natural person or represented by a natural person), i.e. name and surname, company name, address details, NIP number, PESEL number, bank account number, contact details for the purposes of conclusion and performance of the contract, or to take appropriate action at your request, before concluding the contract - pursuant to art. 6 paragraph 1 lit. b) GDPR,

b) in the scope of the necessary personal data of you (as a Contractor who is a natural person or represented by a natural person), and required by law in connection with the concluded contract in order to fulfill the obligations incumbent on the Administrator - from the provisions on accounting, tax, other - on pursuant to Art. 6 section 1 letter c) of the GDPR,

c) in the scope of the necessary personal data of you (as a Contractor or represented by a natural person), as well as personal data of contact persons under the concluded contract for the purpose of the Administrator's legitimate interest in facilitating cooperation with the contract, possible determination, investigation, defense claims or to ensure the safety of people and property through video surveillance in all public zones inside the facility and in its immediate vicinity - pursuant to Art. 6 section 1 letter f) of the GDPR.

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III. Data storage period

1. The administrator will process your personal data in the time necessary to perform the services selected by you in accordance with the contract and will store your personal data for the period required by law for mandatory purposes, including: related to the requirements of the provisions on accounting, establishing, investigating and defending claims.
2. If no contract is concluded with you within the period for which the offer was submitted or in the course of negotiations, etc., your personal data related to the talks (negotiations, etc.) will be immediately deleted.
3. Data due to the legitimate interest will be processed, possibly for the period of time to pursue claims.
4. Data processed as part of video monitoring (image) 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.

IV. Data recipients

Your personal data may be disclosed only to:

- a) Providers of external services, including: technical and organizational for the Personal Data Administrator to the extent necessary for their implementation, but only within the framework of authorizations or assignments (in particular suppliers and entities specialized in providing technical support for ICT systems);
- b) Entities authorized under the provisions of law.

V. Rights of data subjects

According to the GDPR, you are entitled to:

- a) the right to access your data and receive a copy of it;
- b) the right to rectify (correct) your data;
- c) the right to delete data, limit data processing;
- d) the right to data portability;
- e) the right to object to the processing of data described above, and based on the legitimate interest of the Administrator - art. 6 (1) (f). GDPR.
- f) the right to lodge a complaint with a supervisory authority (Personal Data Protection Office).

VI. Information on the requirement / voluntary provision of data

Providing data is voluntary, but it is necessary to conclude and perform contracts with the Administrator.

VII. Automated decision making

You will not be subject to decisions made in an automated manner (without human intervention). Your personal data will also not be used for profiling.

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VIII. Transferring personal data to a third country or an international organization

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

IX. Minimizing the scope of personal data

The Administrator takes all adequate measures to make sure that the scope of the Contractors' personal data that he processes is limited to the personal data adequately required for the purposes indicated in this Policy.

X. Processing of personal data in connection with COVID - 19

In connection with the guidelines regarding the adoption of a protocol in the event of a suspected coronavirus infection, within the Hotel's operations, it may be necessary to establish a list of people (employees, external staff, guests, other third parties) who stayed in the area subject to the risk of infection and provide this information lists to sanitary services conducting epidemiological investigations. For such an eventuality, personal data in the scope of: name and surname, contact details or a description of the state of health (description of symptoms indicating the suspicion of coronavirus infection) may be obtained by the Hotel (as the Personal Data Administrator) for transfer to sanitary services - ordinary data pursuant to art. 6 (1) (c) of the GDPR - in connection with the provisions of applicable law, as well as art. 6 section 1 letter e) of the GDPR - to perform a task carried out in the public interest, while data on health pursuant to art. 9 (2) (i) of the GDPR - in the public interest in the field of public health. These data may be stored by the Hotel for up to 2 weeks from their collection.

XI. Processing of personal data in connection with participation by Hotel Swing sp.z o.o. in the government's financial shield program, introduced under the SIR Act to support micro, small and medium-sized enterprises that have suffered from the SARS-CoV-2 pandemic that causes the COVID-19 disease. If the cooperation with you has been covered by Hotel Swing Sp. z o.o. with headquarters in Krakow with the above-mentioned subsidy (in accordance with the provisions of the General Regulation on the Protection of Personal Data of April 27, 2016, hereinafter: "GDPR") we inform:

1. The administrator of personal data of persons representing your company, contact persons, for the implementation of contracts - in the scope resulting from the established cooperation and its settlement is Hotel Swing Sp. z o.o. with headquarters in Krakow, ul. Dobrego Pasterza 124, 31-416 Kraków, telephone: 12 12 311 11 11, e-mail: office@hotelswing.pl (hereinafter: "ADO").

ADO appointed a DPO, 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. Contact details - e-mail address: inspektor@hotelswing.pl

2. Purposes of personal data processing:

PDA will process personal data included in the documentation regarding the establishment of cooperation, its implementation and settlement:

- in connection with ADO's accession to the government program in the field of financial shield, and introduced on the basis of the SIR Act (to support micro, small and medium-sized enterprises that have suffered as a result of the SARS-CoV-2 pandemic, causing the COVID-19 disease) for the purposes of:

- a) fulfillment of obligations and exercise of rights resulting from the program,
- b) meeting the legal requirements resulting from the contract for co-financing from European Union funds, including the scope of archiving documents,
- c) implementation of the legitimate interest of ADO.

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

The legal basis for the processing of personal data by PDC is:

- a) Art. 6 sec. 1 lit. b) GDPR - in connection with the conclusion of the contract;
- b) art. 6 paragraph 1 lit. c) GDPR - in connection with the need to fulfill the obligations arising from the subsidy contract, including the obligation to archive the documentation covered by the co-financing, other legal obligations under the Accounting Act and the tax ordinance,
- c) Art. 6 sec. 1 lit. f) GDPR - in order to implement a legitimate interest (e.g. in the scope of investigation, defense, claims).

Providing data is voluntary, but failure to provide it would make it impossible to conclude a contract and finance the scope.

4. Information on the categories of recipients of personal data:

Personal data will be available for:

- a) bodies and institutions authorized by virtue of the right to grant, settle, monitor, evaluate, implement the government program, including control and audits (government program), as well as ADO suppliers: technical and organizational services (in particular suppliers and entities specialized in providing technical service of ICT systems) acting for ADO and entities authorized by ADO for possible claims;

The recipients of personal data may in particular be:

- Polski Fundusz Rozwoju S.A., ul. Krucza 50.00-025 Warsaw, detailed information can be found at: <https://pfr.pl/tarcza.html>;
- an intermediary bank - Bank Polskiej Spółdzielczości S.A.

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

Personal data by ADO will not be transferred to recipients located outside the European Economic Area (European Union countries and Iceland, Norway and Liechtenstein).

6. The period for which personal data will be stored:

ADO will store personal data for the period required by law to retain documentation regarding the agreement, its settlement, maintaining the durability of the project in connection with the co-financing.

7. Rights of the data subject:

Data subjects have the right to access their data and the right to rectify incorrect data, supplement incomplete data, delete data after the expiry of the period required by law to retain documentation, in justified cases - processing restrictions and the right to transfer data.

In the case of processing personal data pursuant to art. 6 (1) (a) f) GDPR also has the right to object to the processing, if justified.

Data subjects have the right to lodge a complaint with the supervisory body - the President of the Personal Data Protection Office.

8. Information on automated decision making:

Data subjects will not be subject to decisions made in an automated manner (without human intervention), personal data will also not be used for profiling.