

## **PRIVACY POLICY AND CONSENT TO THE PROCESSING OF PERSONAL DATA**

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We would like to briefly inform you about the processing of your personal data. We process your personal data in accordance with the Regulation and the relevant provisions of the Data Protection Act.

This information does not relate to the personal data of legal persons, including the name, legal form and contact details of the legal person, but on the other hand it does relate to the contact details of the authorized representatives of those legal persons whose personal data are processed.

### **1. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?**

The controller who has determined the purposes and means of processing your personal data is the device against which you are making the reservation. The Bookio Reservation System is only a processor and processes your personal data on behalf of the controller.

### **2. WHO CAN I CONTACT IF I HAVE QUESTIONS?**

We care about protecting your privacy. If you have any questions about the processing of your personal data, please contact the device you are making the reservation with.

If you have any questions about the protection of your personal data in our reservation system, you can also contact us at any time via email: [\*\*info@bookio.com\*\*](mailto:info@bookio.com).

### **3. IN WHAT SITUATIONS WILL THE CONTROLLER PROCESS YOUR DATA?**

3.1. The User provides personal data to the device as a controller ("Controller") freely and voluntarily, in accordance with Regulation No 2016/679 of the European Parliament and of the Council of the EU 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 (General Data Protection Regulation) ("the Regulation") and Act No.18/2018 Z.z. on the protection of personal data and on amending and supplementing certain acts, as amended ("Personal Data Protection Act"). The device is entitled to process the user's personal data in the following scope: name and surname, e-mail, telephone number, note and other data provided in the form, which the device as the Controller deems necessary for the purpose of using the services of the Bookio electronic reservation system, but in particular for the purpose of making a reservation at the device, or for marketing purposes if the user gives the device consent to such processing.

3.2. The device obtains and processes personal data of users who have given their consent to the processing of personal data provided in the reservation form for marketing and advertising purposes of the device (sending advertising messages, informing about news and discounts, consumer contests, etc.) according to the conditions of personal data protection specified by the device. The provider shall keep a record of the consents granted in the reservation system. Withdrawal of the user's consent is only registered in the reservation system if the withdrawal of consent is made by the user via the reservation system.

## CONSENT TO THE SHARING OF USERS' PERSONAL DATA FOR MARKETING PURPOSES pursuant to Art. 6 1(a) of the Regulation

*As a data subject, I agree to the processing of my personal data by the device, including: name and surname, e-mail, telephone number, note and other data provided in the form for marketing and advertising purposes of the device (sending advertising messages, informing about news and discounts, consumer contests, etc.) for the period specified in the terms and conditions of the device's privacy policy.*

*I also declare that I am aware that I am under no obligation to provide this consent to the device and that I have the right to withdraw this consent at any time. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal. If I withdraw this consent, the device must stop processing my personal data thus provided without undue delay, unless it has another legal basis for its subsequent processing. I shall not be at risk of any detriment in connection with the failure to provide or withdrawal of this consent.*

*I also declare that I have been informed of my rights and other information as a data subject within the meaning of Articles 12, 13 and 14 of the Regulation in conjunction with Articles 15 to 22 of the Regulation.*

### INFORMATION ON THE RIGHTS OF DATA SUBJECTS AND OTHER FACTS

*The device will also provide the personal data provided to other recipients that it necessarily needs to provide its services, in particular to the provider, IT service providers, marketing agencies, legal representatives and other cooperating organizations.*

*The personal data provided will not be disclosed to a country outside the EEC or to an international organization.*

*You have the right of access to the personal data provided, which can best be exercised by written or electronic request through the contact details of the device.*

*You have the right to request the rectification or restriction of the processing of the personal data provided, in particular if you believe that it is being processed incorrectly.*

*You have the right to request that the personal data you have provided be transferred to another controller, or you may request such a transfer directly from the device or provider.*

*You have the right to request the deletion of your personal data that you have provided to the device.*

*Your rights may be limited by relevant EU or Member State legislation. Your personal data is not and will not be used in the context of automated individual decision-making.*

*You can also protect your rights by submitting a complaint to the Office for Personal Data Protection of the Slovak Republic. For more information, visit [www.uoou.sk](http://www.uoou.sk).*

*Requests to exercise your rights should be sent from the email address you have provided in the reservation form or in any other relevant way you normally communicate with us so that we can identify you without doubt.*

- 3.3. The User acknowledges that the Provider as a processor within the meaning of Art. 28 of the Regulation and/or Section 34 of the Personal Data Protection Act ("Processor" for the purposes of this Article), processes the personal data of the User as a data subject on behalf

of the device for the purpose specified by the device, in particular the purpose specified in Section 7.1 of these GTC and in the Privacy Policy of the device.

- 3.4. The User agrees to receive information and news from the device related to the services of the device to the User's address under the terms of these GTC and the Privacy Policy of the device.
- 3.5. The establishment using the reservation system, as controller, authorizes Bookio as processor to process personal data on behalf of the controller, for the purposes and by the means specified by the controller, in accordance with the documented instructions of the controller in the data protection contract pursuant to Art. 28 of the Regulation, the Regulation and other legislation.
- 3.6. The controller declares that, when selecting the processor, it has complied with the Regulation and the Personal Data Protection Act, taking care to ensure that the processor provides sufficient guarantees for the adoption of technical and organizational measures so that the processing of personal data complies with the requirements under the Regulation and the Personal Data Protection Act.
- 3.7. The processor is entitled to process the personal data of data subjects by automated and non-automated means of processing.
- 3.8. The processor is authorized to perform the following operations with personal data: obtain, collect, record, organize, process or alter, retrieve, disclose, provide, access, review, rearrange, combine, move, use, store, block, dispose of, transfer across borders.
- 3.9. The controller processes only the personal data of the users on behalf of the operator, in the scope of name, surname, email, telephone number, reservation note, and other personal data specified by the operator in the form.
- 3.10. The controller is obliged to comply with all obligations arising from the Regulation and the Personal Data Protection Act, in particular it is responsible for fulfilling all information obligations towards data subjects and obtaining any consent and bears full responsibility for compliance and fulfillment thereof.
- 3.11. The processor is obliged in particular: - process personal data only on the basis of written instructions from the controller, even if the personal data are transferred to a third country or an international organization, except on the basis of a special regulation or an international treaty to which the Slovak Republic is bound; in the case of such a transfer, the processor is obliged to notify the controller of this requirement before processing the personal data, unless a special regulation or an international treaty to which the Slovak Republic is bound prohibits such notification for reasons of public interest, - to maintain confidentiality of all facts and information of which he has become aware in the performance of the contract and the processing of personal data, and this obligation shall continue after the termination of this contract. - to ensure that the persons authorized to process personal data undertake to maintain the confidentiality of the information of which they have become aware, unless they are bound by a duty of confidentiality under a special law, - to take the measures provided for in Art. 32 of the Regulation and Section 39 of the Data Protection Act, in particular: - the controller and the processor are obliged to take appropriate technical and organizational measures, having regard to the state of the art, the cost of implementing the measures, the nature, scope, context and purpose of the processing of personal data and the risks of varying likelihood and severity to the rights of natural persons, to ensure a level of security appropriate to that risk, which may include, in particular, the following: pseudonymization and encryption of

personal data, ensuring the continued confidentiality, integrity, availability and resilience of personal data processing systems, a process for restoring the availability of, and access to, personal data in the event of a physical or technical incident, a process for regularly testing, assessing and evaluating the effectiveness of the technical and organizational measures to ensure the security of the processing of personal data; - in assessing the appropriate level of security, taking into account the risks posed by the processing of personal data, in particular the accidental destruction or unlawful destruction, loss, alteration or unauthorized disclosure of, or unauthorized access to, personal data transmitted, personal data stored or otherwise processed, - the controller and the processor shall ensure that the natural person acting on behalf of the controller or processor who has access to the personal data processes the personal data only on the basis of instructions from the controller or pursuant to a specific regulation or international treaty to which the Slovak Republic is bound. - to comply with the conditions for the involvement of an additional processor under the terms of the contract for the processing of personal data, - to cooperate with the controller as far as possible by appropriate technical and organizational measures in fulfilling its obligation to take action at the request of the data subject in the exercise of the rights of data subjects under the Regulation and the Personal Data Protection Act, - provide assistance to the controller in ensuring compliance with the obligations to ensure the security of processing, taking into account the nature of the processing of personal data and the information available to the processor, - erase personal data or return personal data to the controller upon termination of the personal data processing contract and erase existing copies, which contain personal data, unless a special regulation or an international treaty to which the Slovak Republic is bound requires the retention of such personal data, - provide the controller with the information necessary to demonstrate compliance with the obligations and provide assistance in the context of a personal data protection audit and control by the controller or an auditor, the processor is obliged to inform the controller without undue delay if it considers that the controller's instructions violate a law, a special regulation or an international treaty to which the Slovak Republic is bound relating to the protection of personal data.

- 3.12. The processor is liable for damage caused by the processing of personal data if it culpably breaches its obligations under these GTC and the data protection Contract with the controller.
- 3.13. The controller hereby grants the processor general written consent to entrust another processor with the processing of personal data.

#### **4. WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?**

In particular, we process common personal data about you, such as name and surname, e-mail address, telephone number and other data specified in the note or specified by the controller. By default, the processor does not process special categories of personal data within the meaning of Article 9 of the Regulation and/or personal data relating to guilty pleas for criminal offences and misdemeanours within the meaning of Article 10 of the Regulation. If such processing occurs, it is always on the instructions of the controller, who is obliged to provide an adequate legal basis for this purpose as well as an exemption.

#### **5. FOR HOW LONG WE WILL PROCESS YOUR DATA**

We retain your personal data for no longer than is necessary for the purposes for which the personal data is processed by the controller. We dispose of your personal data as instructed by the processors.

## 6. WHAT ARE THE SOURCES OF THIS INFORMATION?

The personal data we process about you comes from you and you have provided it to us in the reservation form.

Information about cookies used in the reservation system

| TYPE             | NAME                            | PURPOSE                           | EXPIRATION         | RECIPIENTS                                  |
|------------------|---------------------------------|-----------------------------------|--------------------|---|
| Google Analytics | _ga / _gid / _gat               | Analysing website traffic / usage | Google default     | GA - Marketing and Bookio Development       |
| Local Storage    | bookio-services.widget-customer | Pre-filling the reservation form  | Without expiration | Only the user of the web browser has access |

## 7. WHO IS THE RECIPIENT OF THE PERSONAL DATA

We only disclose your personal data in justified cases and only to the extent necessary to the following categories of recipients:

- our contractual partners, which we need for our normal functioning and operation of the Bookio reservation system, e.g. IT service providers, server solution providers, etc.
- to other entities in cases where we are legally entitled or obliged to disclose your Personal Data or where it is necessary to protect our legitimate interests (e.g. to courts, the Police, etc.).

Your personal data may also be disclosed to other parties if we believe that such disclosure is:

- in accordance with generally applicable law, the Data Protection Act or the Regulation; or
- necessary for the purpose of exercising, establishing or defending a legal right/claim of our company; or
- necessary to protect the vital interests of our company or the vital interests of another person.

## 8. WHAT RIGHTS DO YOU HAVE WHEN PROCESSING YOUR PERSONAL DATA?

- right of access - you can ask the controller (the establishment) for access to your personal data; the controller will also provide a copy of the personal data processed.
- right to rectification - you can ask the controller to rectify inaccurate or incomplete personal data.
- right to erasure - you can ask the controller to erase your personal data if one of the following situations occurs:

personal data are no longer necessary for the purposes for which they were collected or otherwise processed;

personal data have been unlawfully processed;

personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject.

- right to restrict processing - you can ask the controller to restrict the processing of your personal data if any of the following situations occur:

you have denied the accuracy of the personal data for the period necessary to allow the controller to verify the accuracy of the personal data;

processing of your personal data is unlawful, but you refuse the erasure of this data and instead request a restriction on its use;

controller no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims;

you have objected to the processing of your personal data pursuant to Art. 21 (1) of the GDPR until it is verified that the legitimate grounds of the controller outweigh your legitimate grounds.

- right to data portability - where the processing of personal data is based on your consent or is necessary for the performance of a contract to which you are a party and is carried out by automated means of processing, you have the right to obtain the personal data relating to you which you have provided to the controller in a structured, commonly used and machine-readable format, provided that this right shall not adversely affect the rights and freedoms of others.
- right to withdraw consent - if the processing of your personal data is based on consent, you have the right to withdraw your consent to the processing of your personal data for the purpose for which you have given your consent at any time.
- right to object - you may object at any time to the processing of your personal data by the controller for the purposes of direct marketing carried out on the basis of the controller's legitimate interest and whenever we process your personal data on the basis of legitimate interest or public interest, including profiling.
- right to lodge a complaint - you have the right to lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27, [www.uoou.sk](http://www.uoou.sk).

9. **HOW CAN THE DATA SUBJECT EXERCISE HIS/HER RIGHTS?**

The data subject may exercise his or her rights orally, in writing or electronically, via the contact details of the controller (the establishment). You will be informed without undue delay of the action taken on your request, at the latest within one month of receipt of your request. The controller may request the provision of additional information necessary to confirm the identity of the data subject where the controller has reasonable doubt as to the identity of the natural person who has exercised his or her rights by means of a data subject right request. It is the responsibility of the controller to prevent the disclosure of personal data to an unauthorized person. In this case, the time limit for processing your application will only start once your identity has been verified. In the event that this period needs to be extended in justified cases, you will be informed in due time. Where a request to exercise the rights of the data subject would be manifestly unfounded or disproportionate, in particular due to its repetitive nature, we may refuse to process your request or charge you a reasonable fee taking into account the administrative costs of processing it.