

# Terms of personal data processing

## 1. Controller of personal data:

The operator of personal data, i.e. the entity that processes the personal data of the person concerned, is the company Mestský hotel Ľumbier, s.r.o., with its registered office in Nám. Gen. MR Štefánika 31, Brezno 977 01, ID: 55400931 (hereinafter referred to as the "Operator").

We value the privacy of all persons and respect their right to the protection of personal data. The operator processes personal data in accordance with Act no. 18/2018 Coll., on the protection of personal data and on the amendment and supplementation of certain laws concerning persons concerned by Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data (general data protection regulation), ( hereinafter referred to as "the Act").

In connection with our activity, we process personal data for various purposes. In most cases, the processing of personal data is necessary according to a special regulation or an international treaty to which the Slovak Republic is bound.

The operator processes personal data only on lawful legal bases: – fulfillment of the contract or pre-contractual measures, – fulfillment of our legal obligation according to a special regulation; – fulfilling a task carried out in the public interest, – fulfillment of our legitimate interests, unless these interests are outweighed by the legitimate interests of the concerned person, - if it is necessary to protect the life, health or property of the concerned person or another natural person. In other cases, we process the personal data of the concerned persons only with the consent of the concerned person, who may the affected person can withdraw at any time.

## 2. Purposes and legal basis of personal data processing:

In the event that the affected person has a contractual relationship with the Operator, the Operator processes the personal data of the affected persons on the basis of the legal title of the contract, exclusively to the extent necessary to fulfill the purposes of this contract.

For the purpose of resolving complaints, dealing with deficiencies and surveys, the operator processes the personal data of the affected persons on the basis of the legal title of legitimate interest or the consent of the affected person, exclusively to the extent of name, surname, address, e-mail, telephone number, the processing of which is necessary to achieve of the above.

In the event that the person concerned voluntarily without prior involvement The Operator notifies the Operator of their personal data, these personal data will be processed by the Operator to the extent necessary on the basis of legal

title of legitimate interest (mainly for the purpose of assessing the request of the person concerned and providing an answer to the person concerned).

Personal data is processed by Mestský hotel Ľumbier, s.r.o. for the purpose of • invoicing the supplied services

- sending email offers of products from Mestský hotel Ľumbier, s.r.o
- Real estate agencies

Mestský hotel Ľumbier, s.r.o. will not provide personal data to third parties, with the exception of:

- SVU, spol s ro , Súhvezdná 44, Bratislava - Ružinov district 821 02 providing services in the field of HR and accounting
- , provision of services in the SW area
- EORBIS sro Contests taking place on social networks:

Some contests may take place in the form of data sharing, especially comments, through the profiles of the affected persons on social networks (e.g. the reaction of the affected person to the fun page of the Operator through their profile on the social network Facebook or Instagram). In such a case, the Operator will process the personal data of the affected persons for the purpose of the participation of the affected person in the competition and the eventual announcement/publication of the winner of the competition (on the Operator's profile page on the social network) and contacting him for the purpose of handing over the prize (through direct messages on the social network) especially the login name.

The legal basis for the processing of personal data for the purposes is the consent of the person concerned in the form of voluntary participation in the competition. For the purpose of handing over the prize to the winner, the operator may also process other personal data in the scope of name, surname, and residence, which are necessary to achieve the purpose of handing over the prize, on the legal basis of the consent of the person concerned. The person concerned can revoke the consent at any time to those listed below

the Operator's contacts. The operator will process these personal data for the time necessary to achieve the purpose of the competition or until the consent of the person concerned is revoked. After the withdrawal of consent, the Operator will no longer process personal data for the purpose to which the withdrawal of consent relates. However, even after the withdrawal of consent, the operator may continue to process the personal data of the person concerned to a limited extent on the legal basis of legitimate interest, for the period necessary to demonstrate the legitimacy of the processing of personal data or to exercise legal claims or to fulfill obligations arising from generally binding legal regulations (usually for a period of 3 years from the withdrawal of consent to the processing of personal data).

### 3. **Personal data retention period:**

All personal data are processed only to the extent necessary for the fulfillment of the purposes stated in point 2 of these Terms and Conditions and only for the time necessary to achieve the stated purposes, but at the longest for the period determined by the relevant legal regulations or in accordance with them.

Personal data processed by the Operator based on the legal title of consent of the person concerned are processed until the consent is revoked; However, the operator may process some of this data even after withdrawing consent, if there is another legal reason for doing so (e.g. to demonstrate the correctness and legality of the procedure for processing personal data or for the possibility of defense against legal claims).

Personal data processed by the Operator based on the legal title of legitimate interest or personal data processed by the Operator for the purpose of direct marketing are processed until the objection of the person concerned against the processing of his personal data is filed.

4. **Identification of recipients of personal data:**

The operator may disclose the personal data of the affected persons to third parties only in cases where it is required or permitted by law or with the consent of the affected person. The operator makes personal data available only to the usual extent to processors or other recipients:

- suppliers of external services for the Operator (especially programming or other technical support services, server services, sending e-mails, services related to the measurement of traffic to our pages and the adaptation of their content to user preferences),
- operators of backup servers or technology operators used by the Operator, who process them to ensure the functionality of the relevant services of the Operator,
- to the strictly necessary extent, the legal, economic and tax advisors of the Operator and the auditors of the Operator, who process them for the purpose of providing advisory services to the Operator.

5. **Rights of data subjects:**

**Right to access** personal data, the affected person has the right to request from the Operator, upon request, confirmation of whether or not the affected person's personal data is being processed, and if so, to request the provision of information on the processing of personal data concerning the affected person.

The person concerned has **the right to correct** personal data concerning him and with regard to the purpose of personal data processing and to supplement incomplete personal data.

In the case of processing personal data based on the legal title of the contract or on the legal title of the consent of the person concerned, the person concerned has **the right to the portability** of personal data concerning him and which he provided to the Operator, in a structured, commonly used and machine-readable format, if personal data is processed data of the person concerned in an automated form and before the expiration of the personal data retention period. The exercise of this right must not have adverse consequences on the rights of other persons.

The person concerned has **the right to dispose of personal data (the right to erasure of personal data)** that are the subject of processing if:

1. personal data is processed in violation of the law or
2. on the basis of revocation of the consent of the person concerned (in the case of processing personal data from the legal title of consent of the person concerned) or

3. the person concerned objects to the processing of personal data processed by legal title of the Operator's legitimate interest and the Operator's legitimate reasons for processing personal data do not prevail, or
4. personal data are no longer necessary for the purpose for which they were obtained or for which otherwise processed or
5. after the expiration of the personal data retention period.

**The right to dispose of** personal data according to point 5 letter d) does not apply if the processing of personal data is necessary for the Operator to:

1. exercising the right to freedom of expression or
2. exercising the right to information,
3. fulfillment of obligations under Act no. 18/2018 on the protection of personal data and amendments to other laws (effective from 25.5.2018) or a special regulation,
4. exercise of legal claim
5. for the purpose of archiving, for scientific purposes, for the purpose of historical research or for statistical purpose according to § 78 par. 8, if it is likely that the right according to paragraph 1 will make it impossible or seriously difficult to achieve the goals of such processing.

**The right to restrict the processing of** personal data if:

1. the person concerned objects to the correctness of the personal data, during the period 1. enabling the Operator to verify the correctness of the personal data and any updating of the personal data,
2. the processing of personal data is illegal and the data subject objects to the deletion of personal data and instead requests a limitation of their use,
3. the operator no longer needs personal data for the purpose of processing personal data data, but the data subject needs them to assert a legal claim, or
4. the affected person objects to the processing of personal data according to § 27 par. 1 of Act no. 18/2018 on the protection of personal data and on the amendment of other laws (effective from 25.5.2018), until it is verified whether the legitimate reasons on the part of the operator prevail over the legitimate reasons of the person concerned.

**The right to object to** the processing of personal data:

The person concerned has the right to object to the processing of personal data concerning him in all cases where the legal title of the processing of personal data is the legitimate interest of the Operator. The person concerned has the right to object to the processing of personal data concerning him/her even if this personal data is processed for the purpose of direct marketing, including profiling, to the extent that it is related to direct marketing.

If there is a suspicion that personal data is being processed without authorization, the person concerned has the right to submit a proposal for the initiation of personal data protection proceedings to the Office for Personal Data Protection.

If the legal reason for the processing of personal data of the person concerned is his consent, the person concerned can revoke such consent at any time free of charge at the email address below. Revocation of consent does not affect the legality of processing based on consent that was given before its revocation. The person concerned has the right to withdraw consent at any time via e-mail at the address

director@hoteldumbier.eu or in writing to the Operator's address, which is: Mestský hotel  
yumbier, sro, Nám. Gen. MR Štefánika 31, Brezno 977 01