



## PERSONAL DATA PROCESSING POLICY FOR WEBSITE USERS

[www.podhradie.com](http://www.podhradie.com)

The operator of the website [www.podhradie.com](http://www.podhradie.com) is the company POD HRADOM, s.r.o., with its registered office at Považské Podhradie 250, 01704 Považská Bystrica, ID No.: 36 325 341, registered in the Commercial Register of the District Court Trenčín, Section: Sro, File No.: 13420/R (hereinafter referred to as the "operator").

### • ON WHAT BASIS MAY WE PROCESS YOUR PERSONAL DATA?

The processing of personal data is lawful if and only to the extent that at least one of the following conditions is met

- (a) the data subject has consented to the processing of his or her personal data for one or more specified purposes,
- (b) the processing of personal data is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; or
- (c) the processing of personal data is necessary to comply with a legal obligation; or
- (d) the processing of personal data is necessary to protect the vital interests of the data subject or of another natural person; or
- (e) the processing of personal data is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; or
- (f) the processing of personal data is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child.

### • WHAT IF PERSONAL DATA IS NOT PROVIDED?

The controller who determines the conditions and means of processing personal data will not request any personal data from the data subject that (after careful consideration and assessment of the legal basis) are not strictly necessary. The personal data are processed:

- (a) the data subject is under a legal obligation to provide personal data to the controller. If the data subject nevertheless fails to provide his or her personal data, the controller will not be able to fulfil its obligations under specific legislation and the data subject will (may) be in breach of the provisions of the legislation in question, which may result in a refusal to provide a service or to sell goods
- (b) on the basis of a contract with the data subject, the provision of personal data is a contractual requirement. If the data subject does not provide his or her personal data, the controller will not be able to enter into a contractual relationship with the data subject or to take pre-contractual measures at the request of the data subject.
- (c) on the basis of the data subject's consent to the processing of personal data, the provision of personal data is voluntary and is an expression of the data subject's free will. If the data subject does not provide his or her personal data, the controller will not be entitled to process the data for the purposes set out in the specific consent, which may prevent the data subject from being provided with the activities or activities described

POD HRADOM, s.r.o.  
Považské Podhradie 250  
01704 Považská Bystrica  
VAT: 36325341  
TAX ID: SK2021711802



(d) on the basis of the legitimate interests of the controller or the legitimate interests of a third party, the personal data of the data subjects are processed without their prior consent. Data subjects must be informed in advance of the legitimate interests of the controller.

Data subjects shall have the right to object to processing of personal data concerning them which is carried out on the basis of the legitimate interests of the controller. The controller to whom the data subject's objection has been addressed shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

- **FOR WHAT PURPOSE AND WHAT PERSONAL DATA DO WE PROCESS?**

As the controller, the company processes your personal data in the following ways:

**a) E- MAIL BOOKING**

Your personal data is collected directly from you to the extent necessary for your e-mail reservation to be entered into the internal reservation system.

Legal basis: performance of the contract ( retention period - until the end of the stay )

**b) BOOKING ACCOMMODATION FROM ELECTRONIC FORMS**

Your personal data is collected directly from you to the extent necessary for us to be able to book your chosen accommodation.

Legal basis: performance of the contract ( retention period - until the end of the stay )

**c) WEBSITE VISIT**

The purpose of the processing of personal data is your visit to the official website of the hotel ([www.podhradie.com](http://www.podhradie.com)) or to the social networks on which the operator has created a profile. The processing of personal data is governed by separate terms and conditions for the protection of your privacy, which are published on the social networks.

Legal basis: the data subject has expressed his or her consent (by interacting with the plugin) or by active action (by participating in a competition).

**1 c. COOKIES**

The controller may use personal data in the form of cookies stored in the user's web browser to improve the services provided or to analyse the results. Neither the operator's nor third-party cookies contain any personal data and only collect anonymous data associated with the user's user ID. This is data on which pages the user has viewed or what content he/she has searched for. This data is never linked to the user's personal data.

The user has the possibility to stop the use of cookies and thus the possibility to cancel its sending to the server in case of a server request again.

The operator places great emphasis on the safe use of the Internet and the electronic media used to transmit data. However, it urges users to strive for the highest possible security on their part by using the most up-to-date version of the Internet browser, keeping the security features used to access the account confidential, and taking care when transmitting data via electronic media and the Internet.

**2 c. WEBSITE ANALYSIS**

The Operator's websites use analytical tools to measure performance and traffic, in particular Google Analytics, the web analytics service of Google Inc. This tool uses cookies that are stored in the memory of the website user. This information is generally transmitted to a Google server where it is stored. Google does not associate the user's IP address with his or her personal data. The data is anonymous.

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The user's data is stored on the Google server for 26 months. For more information on the storage of personal data used to analyse website traffic, please refer to the Google website - Google Analytics data storage. Google Analytics may store user demographic data such as gender, age, location, etc. The data is anonymous.

Google Analytics may be linked to the Google Search Console, which is used to analyse searches made using the Google full-text search engine and the user's access patterns to the website. This analysis may include the transmission of demographic and other personal data of the user. The data is anonymous. Google Analytics may be linked to Google Search AdWords, which is used to display internet advertising (in the form of text and graphic banners) and to target advertising to the right audience. This analysis may include the transmission of demographic and other personal data of the user. The data is anonymous.

### **3 c. SOCIAL PLUGGINS (APPS)**

Third-party plugins (applications) such as Facebook, Instagram, Google Plus, YouTube, etc. are linked to the Operator's website. These applications are stored and run on third-party servers. The operator's company has no influence on the data protection security when using third-party applications. The operator's website uses third-party plug-ins that allow users to share, comment, rate the website content on social networks or register via a third-party account. In this case, the web browser establishes a direct connection between the user and the third party, which involves the use of cookies and the transfer of the user's data between the website, the user's browser and the third-party server. As a rule, the data is not associated with the user's personal data. The operator uses, as a matter of principle, reliable sources of plug-ins and add-ons on its website. The operator cannot guarantee the functionality or reliability of third-party plugins.

In the event of user actions on the Operator's website via social plugins, these actions may be displayed on third-party sites depending on the user's account settings (e.g. Facebook Like, Google Plus, Social Sharing, etc.).

### **4 c. ADVERTISING AND REMARKETING**

The Operator's website may display advertisements that include third-party advertisements and may be used to display advertisements on third-party websites. The advertising system may use PPC or PPI technology and remarketing. These technologies are used on the Site in order to provide the user with the most relevant offer, including on third party websites. Through personalised advertising targeted to the interests of the user, the operator provides a more interesting display of advertising to which the user has a personal relationship.

Ads are displayed on the operator's website and on third-party websites using cookie technology and analysis of the user's internet behaviour. This website uses the Google AdWords advertising system and Facebook Ads.

### **5 c. MAPS AND LOCATION**

This website may contain maps using Google Maps. This service may store personal data relating to the user's location.

### **6 c. CONTRIBUTIONS FROM USERS**

Users of the www.podhradie.com website can contribute their content in the form of comments, ratings, etc., on the company's social networking pages or on their own social networking pages in the form of sharing and rating.

Any content, information or other forms of data and communication posted on the site by users on the www.podhradie.com website or shared via social networks and other applications, including on third-party websites, are not considered confidential and are not subject to trade secret protection.

The operator does not accept responsibility for users' contributions, information and communications. It also expressly prohibits the publication or transmission on the Website of any unlawful, threatening, defamatory, obscene or other material offensive to human dignity or of any discriminatory nature.



#### **(d) APPLICATIONS FOR EMPLOYMENT**

Personal data are processed by the controller mainly for the purpose of filling vacant positions. The provision of personal data by the data subject is a pre-contractual requirement. Failure to provide personal data will prevent the data subject from being included in the selection procedure.

Legal basis: performance of the contract (retention period - up to 1 year from the date of receipt of the CV)

#### **(e) ACCOUNTING AND BUSINESS AGENDA**

The purpose is the fulfilment of the legal obligations of the controller arising from specific regulations (e.g. Accountancy Act, Income Tax Act, Value Added Tax Act)

Legal basis: legal obligation (retention period - 10 years)

#### **(f) ARRANGEMENT OF RELATIONSHIPS, LIABILITIES AND RENTAL OF PREMISES**

Personal data is processed in this record for the purpose of arranging weddings and parties. Personal data: name, surname, telephone contact, e-mail contact

Personal data is processed in this record for the purpose of renting the premises for social and corporate events.

Personal data: name, surname, telephone contact, e-mail contact, address, company billing data

Legal basis: performance of contract (retention period - 10 years)

#### **(g) PERSONNEL AND WAGE AGENDA**

The purpose of the processing is the preparation and conclusion of an employment contract or agreement for work outside employment, the recording of documents on working capacity, the payment of wages, levies, the fulfilment of obligations towards public authorities, attendance records, training records, records of issued authorisations and authorisations, records of the issue of cash, provision of employee benefits, records of damage caused by employees to the workplace or to the property of the operator, provision of catering, copying of documents necessary for the purposes of the employment or similar relationship, as well as the fulfilment of other legal and contractual obligations.

Legal basis: legal obligation, performance of a contract (retention period - for the duration of the employment relationship or other similar relationship until the employee reaches the age of 70)

#### **(h) REGISTRATION ADMINISTRATION**

Management of the register, handling of the whistleblowers' agenda. The purpose of the processing is to fulfil the legal obligations arising from Act No 395/2002 Coll. on archives of registers of records on the amendment of certain acts, as amended.

Legal basis: legal obligation (retention period - 10 years)

#### **i) CAMERA SYSTEM - SPACE MONITORING**

The purpose of monitoring is the protection of property in the monitored area and the protection of natural persons in the area, as well as the ongoing acquisition of evidence of the causes, course and consequences of security incidents.

Legal basis: legitimate interest pursued by the controller consisting in the right to protect property, health and the right to require compliance with public order (retention period - 72 hours)

#### **(j) FILING OF COMPLAINTS AND COMPLAINTS FROM AFFECTED PERSONS**

The purpose of the processing is to deal with a complaint or a claim by a natural or legal person seeking protection of his/her rights or interests which he/she considers to have been violated.

Legal basis: legal obligation (retention period - 5 years)

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- **WHAT ELSE SHOULD YOU KNOW?**

The personal data of the data subjects are processed automatically, both electronically and manually by the controller's employees, depending on the type of service or product. We only pass on personal data to third parties in exceptional cases where it is in the legitimate interest of the controller.

- **DO YOU KNOW WHAT YOU HAVE THE RIGHT TO?**

The data subject has the right to ask the controller for information about the processing of his or her personal data (Article 15 GDPR). The data subject has the right to have inaccurate personal data concerning him or her rectified by the controller without undue delay. Taking into account the purpose of the processing, the data subject has the right to have incomplete personal data completed, including by providing an additional declaration (Article 16 GDPR).

The data subject shall have the right to have personal data concerning him or her erased by the controller without undue delay and the controller shall be obliged to erase the personal data without undue delay if one of the grounds set out in the General Data Protection Regulation (Article 17 GDPR) applies.

The data subject has the right to have the controller restrict the processing of personal data in the cases provided for in the General Data Protection Regulation (Article 18 GDPR).

The data subject shall have the right to object to processing of personal data concerning him or her where the controller processes personal data on the following grounds:

1. the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller,
2. the processing is necessary for the purposes of the legitimate interests of the controller or of a third party,
3. for direct marketing purposes,
4. for scientific or historical research purposes or statistical purposes (Article 21 GDPR).

You also have the right to object to the processing of personal data we process about you by contacting the relevant supervisory "Data Protection Authority" at:

Data Protection Authority  
Hraničná 12  
820 07 Bratislava 27

The data subject shall have the right to obtain personal data concerning him or her which he or she has provided to the controller in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without being prevented from doing so by the controller to whom he or she has provided the personal data, in the cases provided for in the General Data Protection Regulation (Article 20 GDPR).

Where the processing of personal data is based on consent to the processing of personal data provided by the data subject, the data subject has the right to withdraw that consent at any time.

- **HOW CAN YOU EXERCISE YOUR RIGHTS?**

You can exercise your rights by sending a written request by post to POD HRADOM, s.r.o., Považské Podhradie 250, 01704 Považská Bystrica, or electronically to the email address [pbarancova@podhradie.com](mailto:pbarancova@podhradie.com). We will respond to your request regarding the processing of personal data without undue delay and in any case within one month of receipt.

For complete information on the protection of personal data, please visit the website of the Office for Personal Data Protection.

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