

Information on the Processing of Personal Data of Clients

pursuant to Regulation (EU) of the European Parliament and of the Council of 27 April 2016, 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), hereinafter the “**Regulation**”, especially Article 13.

1. **The controller of the personal data is our company, i.e. Grandhotel service s.r.o.,** company registration number: 04680308, having its registered seat at: Benešova 605/18, Brno-město, 602 00 Brno, Czech Republic, entered in the Commercial Register maintained by the Regional Court in Brno, Section C, File 91396 (hereinafter referred to as the “**Controller**”)

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2. **The Controller may process your personal data as the personal data of a client (hereinafter referred to as the “Data Subject”) for the purpose and within the following legal framework:**

Purpose of processing:	Legal framework:
- Compliance with legal obligations, especially in the area of accounting and taxes, registration of arriving foreigners, citizen registries and local fees.	- Fulfilment of legal obligations of the Controller [Article 6, Para 1, Letter c) of the Regulation]
- Conclusion and performance of a contract of accommodation between the Controller and the Data Subject.	- Performance of a contract or adoption of measures prior to the conclusion of a contract [Article 6, Para 1, Letter b) of the Regulation]
- Sending of commercial communications to the Data Subject electronically or by post (<u>direct marketing</u>).	- Granting of consent by the Data Subject [Article 6, Para 1, Letter a) of the Regulation]
- Paying for services provided by the hotel, including the settlement of outstanding fees via the <u>payment card data</u> of the Data Subject.	- Granting of consent by the Data Subject [Article 6, Para 1, Letter a) of the Regulation]
- Protection of the property of the Controller and third persons, protection of lives and safety via a permanent <u>CCTV system</u> .	- Legitimate interest of the Controller or third parties [Article 6, Para 1, Letter f) of the Regulation]
- Retention of the personal data of guests for the purpose of future bookings.	- Granting of consent by the Data Subject [Article 6, Para 1, Letter a) of the Regulation]

3. **The Controller may provide personal data to the following categories of third parties:**

- Providers of services in the field of accounting, taxes, and auditing; providers of legal services; providers of IT services; intermediaries in the field of accommodation services; banks (the identity of these third parties shall be disclosed by the Controller to the Data subject, where requested).
- Other entities which may receive the personal data in accordance with the applicable legislation (e.g. the police).

4. The Controller shall retain the personal data for no more than **5 years** from the check-out from the hotel, unless otherwise stipulated by the applicable legislation. The Controller shall process the relevant personal data after the expiry of the aforementioned period, if the legal relationship arising from the accommodation shall still exist.

Footage from the CCTV shall be retained **for 5 days**. In the event of an incident, the footage showing the incident shall be retained for as long as necessary.

Payment card data shall be retained for a period of 14 days from the departure.

5. The Controller requires the provision of personal data for the purpose of the performance of obligations arising from the contract, or where the disclosure is required pursuant to the applicable law. The failure to provide data may be an obstacle to the conclusion of a contract.
6. The Controller shall not provide the personal data to any third country or an international organisation.
7. With regard to the processing of personal data, the Data Subject **is entitled to the following:**
 - i. **Right of access.** This includes the right to obtain confirmation from the Controller as to whether or not personal data concerning him or her is being processed, and if so, the purpose of the processing, the scope of the processing and the recipients of this data, the retention period, as well as the existence of the right to rectification, erasure, restriction of processing, or the right to object to processing, the sources of the personal data, as well as information as to whether or not the process entails automatic decision-making, including profiling. This includes the right to obtain a copy of the personal data. The first instance shall be free, any further instances may be subject to a reasonable charge by the Controller to cover the necessary administrative costs (cf. Article 15 of the Regulation).
 - ii. **Right to the rectification or completion of their personal data.** The Controller shall, without undue delay, correct or complete the inaccurate/incomplete data (cf. Article 16 of the Regulation).
 - iii. **Right to erasure.** Personal data shall be erased if it is no longer needed for the given purpose or where the consent has been withdrawn (cf. Article 17 of the Regulation).
 - iv. **Right to the restriction of processing.** The data subject shall have the right to obtain from the Controller the restriction of processing until disputes are resolved regarding the processing of personal data (cf. Article 18 of the Regulation).
 - v. **Right to data portability.** This includes, in particular, the right to obtain personal data in a structured and conventional and machine-readable format and, where technically feasible, the right to have the data transmitted by the Controller to another controller (cf. Article 20 of the Regulation).
 - vi. **Automated individual decision-making.** The Data Subject has the right not to be subject to a decision based solely on automated processing, including profiling, unless required for the sake of contract performance (cf. Article 20 of the Regulation);
 - vii. **Right to withdraw consent with the personal data processing.** The withdrawal of consent shall not affect the lawfulness of the processing based on consent given before its withdrawal.

The aforementioned rights may be asserted with the Controller in writing (via a registered letter) or by e-mail to the e-mail addresses shown above.

Pursuant to the Regulation, the Data Subject may also lodge a complaint regarding the processing of his or her data with the Office for Personal Data Protection. More information and contact information can be found at <https://www.uoou.cz/>.

The Data Subject shall have the right to object at any time to the processing of personal data concerning him or her. If requested, the Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the Data Subject. The Data Subject may object at any time to the processing of personal data for the purpose of direct marketing.