

## INFORMATION MEMORANDUM WITH THE PROCESSING OF PERSONAL DATA

This information memorandum was issued in accordance with the Regulation of the European Parliament and the Council (EU) of 27 April 2016 on the protection of natural persons in connection with the processing of personal data and on the free movement of such data and on the repeal of Directive 95/46/EC (hereinafter referred to as "GDPR")

### Who do you entrust personal data to?

You entrust your personal data to the company (i.e. personal data administrator) IPP Plaza s.r.o., company ID: 091 07 142, VAT number: CZ09107142, registered office: náměstí I. P. Pavlova 1787/1, Nové Město, 120 00 Prague 2 registered in the commercial register kept at the Municipal Court in Prague, section C, file 330998 (hereinafter referred to as the "company").

### Why do we collect information?

The information is collected in order to facilitate the booking process between the customer and the accommodation service provider. To offer you additional services where you consent to such offers and/or to help us improve this process for future use.

### For what purposes do we collect information?

- Running or supporting the activity of the reservation process
- The process of voluntary customer registration to subscribe to the newsletter
- Statistical use of the system for its possible improvement
- There is no other use of the collected information, above all the information is never passed on to third parties without consent

### Who has access to some or all of the information collected?

- The provider of accommodation services with whom your reservation will be made
- Website and booking form provider
- Institutions that are authorized to do so

### What access do we guarantee our visitors to the information collected about them?

Access to all collected information is possible at any time upon request

If you believe that our website or systems have collected incorrect information or wish to dispute any information, please contact us.

### Personal data processing based on reservation or stay

The Company will process personal data of users only after the user fills in their data to the relevant form for newsletter and other advertising notifications order and subsequently confirms submitting the order and their consent with personal data processing by reply according to instructions delivered in e-mail message. If the order is not confirmed, the filled in data will not be stored anywhere.

The provided personal data is being processed until the granted consent is withdrawn. The processing of personal data will be performed by the Company itself, or as the case may be, through a specialized processor.

The consent with processing of personal data is completely voluntary and the user may withdraw it at any time by sending a notice of withdrawing the consent in writing to the Company's address (see below).

We process personal data of clients based on their reservation (or stay without reservation) in the following extent:

- Identification and contact information (name and surname, address of permanent residence, citizen's ID card number or another ID document number and, as the case may be, also e-mail address and telephone number);
- In case of self-employed natural persons also their business name, registered office, company ID number, Tax ID number and VAT payer information;
- In case of business trips of non-entrepreneurs also data on the organization that ordered or pay for the accommodation;
- Information on your membership in a loyalty program;
- Information on your stay and services used and on the amount and manner of payment for the services provided (in case of cashless payment number of bank account or credit card data);
- In case of foreign nationals, in addition to the above referred data also date of birth, citizenship, number of travel document, visa number, permanent residence address abroad;

Processing for the purpose of compliance with legal obligations

Provision and processing of all the above referred personal data, with the exception of e-mail address and telephone number and information on your membership in loyalty program, is necessary in order to comply with legal obligations of the Company, in particular obligations arising from the Act on Local Fees and Act on the Residence of Foreign Nationals in the Territory of the Czech Republic and also from accounting and tax regulations.

Processing necessary to fulfill contractual relationship

Processing of your identification data and data on your stay and on the services provided and on the manner of payment therefor is necessary in order to fulfill the contractual relationship regarding your stay, i.e. securing orders and reservations, concluding and performing agreements related to the accommodation, boarding and associated services offered and provided by the Company.

Processing necessary for legitimate interest purposes

We process your personal data in the extent of name, surname, e-mail address and information on your stay on the basis of legitimate interest of the Company for direct marketing purposes, the purpose of processing is in this case solely the possibility to send you marketing and business notifications, i.e. information on interesting news, discounts etc.

We process personal data to this extent also in order to send satisfaction questionnaires after your stay in order to verify your satisfaction with the Company's services and to continuously improve the quality of the Company's services provided to you.

There are generally no cases of disputes regarding our services on the part of our guests. If there was a dispute regarding the provided services on the part of the Company, the Company would be forced to process data on the services provided in the extent necessary to conduct such dispute, solely for the purpose of protecting the rights of the Company in such dispute. Similarly the Company would be forced to process the necessary data also in case of failure to pay for the services or in case of damage incurred by the Company.

#### Personal data processing in relation to accommodation service

Personal data of customers (name, surname, date of birth, citizen's ID card or passport number, address of residence, signature), who stay in the Nobilis Residence is being processed by the Company based on the legal ground stipulated by the Act no. 565/1990 Coll., on Local Fees, as amended, and the Act no. 326/1999 Coll., on the Residence of Foreign Nationals (Section 101), as amended. As such, this processing is necessary in order to comply with legal obligation in compliance with art. 6 (1) c) of GDPR and consequently such processing does not require consent of the accommodated person (Data Subject).

The Company stores, based on a consent, the name, surname and e-mail address of its customers also in order to verify the satisfaction of customers or to make a business offer of the same nature, or to offer service that was the subject of a previous order. In such case the Data Subject is entitled to withdraw their consent at any time by sending an express notice thereof to the e-mail address [booking@nobilisresidence.cz](mailto:booking@nobilisresidence.cz)

#### Google Analytics and Google Adwords

For analysis of web pages via cookie files the Company uses the Google Analytics service, developed and operated by Google Inc., with a registered office at Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

Google will not connect the transmitted data, including IP address, with other data. Google's declaration on personal data protection can be reviewed [here](#).

A website visitor may prevent collection of cookie files and analysis thereof through Google Analytics either by changing the browser settings, as referred to above, and also by:

- Clicking the following link, whereby a so called opt-out cookie will be placed on your computer, which will prevent future storage of data on visiting the website;
- Installing a plugin to your browser available [here](#). This plugin only works in the relevant browser on the relevant computer and it must not be deactivated or deleted after installation in order to maintain the deactivation of the Google Analytics service.

Within the frame of the Google Analytics service the Company also uses associated advertising functions offered by Google, such as overview of views in the Google advertising network, extended reporting of anonymous demographic data (e.g. age, sex, interests) or viewing advertisements in the content network based on the viewed products (so called remarketing), including the Google AdWords service used for advertising personalization and improvement of advertising and remarketing targeting.

### Information clause on CCTV system in the premises of Nobilis Residence

The purpose of processing is the protection of property and increase of safety of persons. The extent of processing only includes video record from the CCTV system, no sound is recorded. Administrator of these records is the Company. The CCTV system records are kept on HDD device / hard disk operated by the Company. No other Processor is utilized for the CCTV system. The place of processing is apartments Nobilis Residence a jeho prostory na adrese nám I.P. Pavlova 1787/1, Nové Město, 120 00 Praha 2

The only possible recipients of data from the CCTV system are the authorities involved in criminal proceedings or administrative authorities for the purpose of proceedings on administrative offenses.

The cameras pan the entrance area and reception, hallways, entrances/exits for clients and staff, entrances for supplying and handling areas.

The records are kept for a maximum of 30 days , thereafter they are automatically deleted by overwriting with new records, since the CCTV system works in a loop mode.

The CCTV cameras are operating non-stop.

Contact information for receipt of requests for information is provided below.

### Term of personal data processing

We process your personal data for the duration of your stay in our hotel. After conclusion of your stay we process only:

We process the data, the obligation to process which arises from the applicable legislation, only for the time necessary under the applicable legislation (e.g. accounting and tax documents which we issue to you also contain your certain personal data (name, surname, type of provided service, date of issuing the document). We only store this data for the purpose of compliance of obligations stipulated by the relevant accounting and tax legislation for the time stipulated by this legislation.)

Your name, surname, e-mail address and information on your stay for the purpose of direct marketing of the hotel (sending information regarding interesting news or discounts on our services etc.) and for sending satisfaction questionnaires. We process the data used for sending the satisfaction questionnaire only until the questionnaires are evaluated (no more than 1 month after your stay). We process your data stated above for the purposes of direct marketing until the time you convey to us your possible disapproval with such further processing.

The data necessary for the purpose of existing or realistically impending disputes. We process this data only until the time of final and effective decision regarding the dispute

resolution and compliance with the obligations arising from such decision, or as the case may be, until the time in which according to the applicable legislation a dispute may arise concerning the provided services.

After the lapse of the time limits referred to above we regularly erase your personal data, both in paper and electronic form.

#### Other rights associated with personal data protection

Data subjects, personal data of which the Company processes, have the following rights associated with processing of their personal data, provided that the requisites stipulated by the applicable legislation are met:

- Right access to personal data consisting in the right to receive free of charge information on the basis of a request for information, which personal data of the data subject is processed by the Company;
- Right to rectification of the processed personal data;
- Right to erasure of the processed personal data;
- Right to limitation of processing of personal data;
- Right to transfer of personal data;
- Right to withdraw any previously provided consent with personal data processing at any time, if the consent is the legal basis for the relevant personal data processing (i.e. for sending newsletter and other advertising notifications).

Furthermore, provided that the requisites stipulated by the applicable legislation are met, the Data Subjects, personal data of which the Company processes, have the right to file an objection against processing of their personal data, if the legal basis for the processing is legitimate interest of the Company. If the personal data is processed for the purpose of direct marketing, the Data Subject is entitled to file an objection against such processing at any time.

The Data Subjects, personal data of which the Company processes, may exercise the above stated rights in writing or by e-mail with the Company being the Personal Data Controller, on the below stated contact information.

The Controller may be reached:

- a) In writing at the address I.P. Pavlova 1787/1 sq, Nové Město, 120 00 Prague 2
- b) Electronically by e-mail: [booking@nobilisresidence.cz](mailto:booking@nobilisresidence.cz)

The above stated rights of Data Subjects are not absolute rights. Any asserted rights will be assessed by the Company individually and with regard to its rights and rights of third parties.

If the Data Subject believes that there has been a violation of the applicable legislation in connection with the protection of their personal data, they are entitled to file a complaint with the supervisory authority. The supervisory authority for the territory of the Czech Republic is the Office for Personal Data protection, Pplk. Sochora 27,170 00 Prague 7 ([www.uoou.cz](http://www.uoou.cz)).