

Privacy policy

1. Principles of personal data processing

The company **Termálne kúpalisko Podhájska, s.r.o., address 493, 941 48 Podhájska, IČO 34 126 040** (from now on referred to as the „Operator“) following the Regulation 2016/679 GDPR about natural persons' data protection and its processing, and about the free movement of such data (from now on referred to as the „Regulation“) and Act No. 18/2018 Z. z. about the personal data protection and about the amendment and addition of specific laws (from now on referred to as the „law“) has developed the security measures that are regularly updated. They define the scope and method of security measures necessary to eliminate and minimize threats and risks affecting the information system to ensure:

- the availability, integrity, and reliability of management systems using the most modern information technologies,
- to protect personal data from loss, damage, theft, modification, destruction, and maintain their confidentiality,
- to identify the potential problems and sources of disruption and prevent them.

Data protection officer's contact: podhajska@iosec.eu

2. Personal data protection policy

Your personal data will be stored securely, following the data retention policy, and only for the time necessary to fulfill the purpose of processing. Only persons authorized by the operator to process personal data have access to and process it based on the operator's instructions. Your data will be backed up following the operator's retention rules. Personal data stored in backup storage serves to prevent security incidents, which could arise mainly from a security breach or damage to the data's integrity.

3. Definitions

- 3.1. **„personal data“** is any information relating to an identified or identifiable natural person (from now on referred to as „the data subject“); an identifiable natural person is a person who can be identified directly or indirectly, in particular by reference to an identifier such as name, identification number, location data, online identifier, or by reference to one or more elements that are specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person,
- 3.2. **„processing“** is an operation or set of operations with personal data or settings of personal data, for example, obtaining, recording, arranging, structuring, storing, processing or changing, searching, viewing, using, providing by transmission, dissemination, or otherwise providing, rearranging or combining, restriction, erasure or disposal, whether by automated or non-automated means,
- 3.3. **„restriction of processing“** is the designation of stored personal data to limit their processing in the future;
- 3.4. **„profiling“** is any form of automated processing of personal data, which consists of the use of this personal data to evaluate certain personal aspects relating to a natural person, primarily analyzing or predicting aspects of the concerned natural person related to performance at

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work, financial conditions, health, personal preferences, interests, reliability, behavior, position or movement;

- 3.5. **„an information system“** is any organized set of personal data that is accessible according to specified criteria, regardless of whether the system is centralized, decentralized, or distributed on a functional or geographical basis;
- 3.6. **„the operator“** is a natural or legal person, public authority, agency, or other entity that alone or jointly with others determines the purposes and means of personal data processing; if the purposes of Personal data protection - information obligation and the means of this processing are defined in the law of the Union or the law of a member state, the operator or specific criteria for its determination may be determined in the law of the Union or the law of a member state;
- 3.7. **„an intermediary“** is a natural or legal person, public authority, agency, or other entity that processes personal data on behalf of the operator;
- 3.8. **„a third party“** is a natural or legal person, public authority, agency, or entity other than the affected person, operator, intermediary, and persons who, based on the direct authorization of the operator or intermediary, are entrusted with the processing of personal data;
- 3.9. **„the consent of the person concerned“** is any freely given, specific, informed, and unambiguous expression of the will of the person concerned by which they express their support to the processing of personal data concerning them in the form of a statement or a clear confirming act;
- 3.10. **„a breach of personal data protection“** is a breach of security that results in the accidental or unlawful destruction, loss, alteration, unauthorized provision of personal data that is transmitted, stored, or otherwise processed, or unauthorized access to it,
- 3.11. **„a relevant and justified objection“** is an objection to the draft decision, whether there has been a violation of this regulation or whether the planned measure concerning the operator or intermediary is following this regulation, which must clearly demonstrate the seriousness of the risks posed by the draft decision in terms of basic the rights and freedoms of the persons concerned and, where applicable, the free movement of personal data within the Union;

4. Purposes of personal data processing

4.1. Fulfillment of a contract to which the affected person is a contracting party or to take measures based on the affected person's request before concluding the contract

We process the personal data about our guests based on the agreement following Article 6 para. 1 letter b) and Art. 6 par. 1 letter c) regulations according to Act no. 404/2011 Z. z. about the movement of foreigners and the amendment of some laws. Scope of processed personal data: title, first name, last name, address, country, date, and place of birth, payment card number and expiration date, identity document number, telephone, e-mail, and purpose of stay. Subsequently, they are stored following Act No. 395/2002 Z. z. about archives and registries.

4.2. Reservation of accommodation

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Personal data we process about our guests is processed based on a contract following Article 6, paragraph 1 letter b) of the regulation. Scope of processed personal data: title, first name, last name, phone, email, date and time of reservation, IP address. Subsequently, they are stored for 10 years following Act No. 395/2002 Z. z. about archives and registries.

4.3. Reservation of services

Personal data that we process about our customers is processed based on a contract following Article 6 par. 1 letter b) of the regulation. Scope of processed personal data: title, name, surname, telephone, email, date, and time of reservation. They are then stored for 1 year.

4.4. Season tickets

Personal data about our guests is processed based on a contract following Article 6, paragraph 1 letter b) of the regulation. Scope of processed personal data: title, name, surname, address, date of birth, photo. They are then stored for 1 year.

4.5. Record of requests

Personal data that we process through the contact forms listed on our website and e-mails are only processed to process your request. By filling out and sending the application, you agree to the processing of personal data following Article 6, paragraph 1 letter a) of the regulation (the person concerned have expressed their consent to the processing of their personal data for one or more specific purposes). Scope of processed personal data: name, surname, address, telephone, e-mail. Personal data will be stored until the purpose for which it was processed is fulfilled. Suppose retention periods must be observed according to commercial and tax law. In that case, the retention period is governed by Act no. 395/2002 Z. z. about the archives of Personal data protection - information obligation and registries. Personal data **is not transferred** to a third country. Personal data **will not be used for** automated individual decision-making, including profiling.

4.6. Processing of accounting documents

Processing is necessary to fulfill the legal obligation of the operator following Article 6, paragraph 1 letter c) regulations. Scope of processed personal data: title, first name, last name, address, telephone, account number, e-mail, and signature. Subsequently, they are stored following Act No. 395/2002 Z. z. about archives and registries.

4.7. Photographing visitors using the attractions

We process the personal data about our visitors to the toboggan attraction based on consent following Article 6 par. 1 letter a) of the regulation. Scope of processed personal data: photo. They are then stored for 1 day.

4.8. Records of complaints

We process the personal data of affected persons who seek the protection of their rights or interests protected by law, or point to specific shortcomings, in particular to violations of legal regulations, the elimination of which requires the intervention of a competent authority following Article 6, paragraph 1 letter c) regulations (processing is necessary to fulfill the legal

obligation of the operator). Scope of processed personal data: name, surname, address, telephone, e-mail, and signature. They are then stored for 5 years.

4.9. Complaints

In the case of complaints, personal data is processed following Article 6, paragraph 1 letter c) regulations. Scope of processed personal data: title, first name, last name, address, telephone, e-mail. Subsequently, they are stored following Act No. 395/2002 Z. z. about archives and registries.

4.10. A debt collection

In the case of debt collection, personal data is processed following Article 6, paragraph 1 letter c) regulations. Scope of processed personal data: name, surname, social security number, address, telephone, e-mail. Subsequently, they are stored in accordance with Act No. 395/2002 Z. z. about archives and registries.

4.11. Executions

The processing of personal data is necessary to fulfill the legal obligation of the operator following Article 6 par. 1 letter c) regulations. Scope of processed personal data: ordinary personal data, other personal data found or provided during the procedure. Subsequently, they are stored following Act No. 395/2002 Z. z. about archives and registries.

4.12 Records of job applicants

The processing of personal data of job applicants is carried out based on „**Consent**“ to the processing of personal data in accordance with Article 6 paragraph 1 letter a) of the regulation, which will be provided by the applicant. The operator **will contact only successful applicants**. Personal data is stored for 12 months from the date of consent.

Personal data **is not transferred** to a third country. Personal data **will not be used for** automated individual decision-making, including profiling.

You have the right to withdraw your consent to the processing of personal data at any time before the expiration of the stated period by sending a request to the email address: info@tkpodhajska.sk or by sending a request to the address of the Operator with the text GDPR withdrawal of consent on the envelope. The operator declares that in the event of a written request by the affected person to terminate the processing of personal data before the specified period, these will be deleted within 30 days from the delivery of the withdrawal of consent.

4.13. The premises monitoring for property protection

A camera information system is located at our facility, which monitors the operator's external and internal premises for property protection in the sense of the operator's legitimate interest following Article 6 para. 1 letter f) regulations. Recordings from the camera system are not provided to third parties. They are made available only to authorized persons of the operator and IT Personal data protection - information obligation to specialists who perform maintenance on them. Personal data obtained by the camera system is used to protect the property and to provide evidence in administrative proceedings in cases where personal data obtained by the camera system is used as evidence in ongoing administrative

proceedings. Suppose the created record is not used for the purposes of criminal proceedings or misdemeanor proceedings. In that case, the record is automatically deleted by program activity within 5 days from the day following the day on which the record was made.

4.14. Records of representatives of suppliers and customers

The processing of personal data of suppliers and customers is carried out following the legitimate interests of the operator, following Article 6 par. 1 letter f) regulations. Scope of processed personal data: title, first name, last name, job classification, service classification, functional classification, personal employee number, professional department, place of work, telephone number, fax number, e-mail address to the workplace, and identification data of the employer. Subsequently, they are stored following Act No. 395/2002 Z. z. about archives and registries.

4.15. Direct marketing

Personal data that we process about our customers for marketing purposes is processed based on the operator's legitimate interest in Article 6 para. 1 letter f) regulations. Scope of processed personal data: first name, last name, telephone, and e-mail. Subsequently, they are stored during the contractual or business relationship between the client and the operator.

5. Rights of the data subject

- 5.1. **The right to withdraw consent** - in cases where we process your personal data based on your consent, you have the right to withdraw this consent at any time. You can withdraw your consent electronically, at the address of an authorized person, in writing, with a notice of withdrawal of consent, or in person at our company headquarters. Withdrawal of consent does not affect the legality of processing personal data that we processed about you based on it.
- 5.2. **Right of access** - you have the right to be provided with a copy of the personal data we hold about you and information about how we use your personal data. In most cases, your personal data will be provided in written document form unless you request another way. If you have requested the provision of this information by electronic means, it will be provided to you electronically if technically possible.
- 5.3. **Right to rectification** - we take reasonable steps to ensure the accuracy, completeness, and timeliness of the information we hold about you. If you believe our data needs to be updated, complete, or outdated, please feel free to ask us to correct, update or supplement this information.
- 5.4. **Right to deletion (to be forgotten)** - you have the right to ask us to delete your personal data, for example, if the personal data we have obtained about you is no longer necessary to fulfill the original purpose of processing. However, your right must be assessed in light of all the relevant circumstances. For example, we may have certain legal and regulatory obligations, which means that we will not be able to comply with your request.
- 5.5. **Right to restriction of processing** - in certain circumstances, you are entitled to ask us to stop using your personal data. These are, for example, cases where you believe

that the personal data we have about you may be inaccurate or when you believe that we no longer need to use your personal data.

- 5.6. **The right to data portability** - in certain circumstances, you have the right to ask us to transfer the personal data you have provided to the walls to another third party of your choice. However, the right to portability only applies to personal data we have obtained from you based on consent or a contract to which you are a party.
- 5.7. **Right to object** - you have the right to object to data processing based on your legitimate interests. If we do not have a compelling legitimate reason for processing and you file an objection, we will not process your personal data further.

If you believe that any personal data we have about you is incorrect or incomplete, please get in touch with us.

If you want to file an objection to how we process your personal data, contact the person responsible for supervising the personal data processing by e-mail at: podhajska@iosec.eu or in writing at:

Termálne kúpalisko Podhájska, s.r.o.

493

941 48 Podhájska.

Our authorized person will review your objection and work with you to resolve the matter, in case you believe that your personal data is being processed unfairly or illegally.

In that case, you can file a complaint with the supervisory authority, the Personal Data Protection Office of Slovak Republic, Hraničná 12, 820 07 Bratislava 27; tel. number: 421 /2/ 3231 3214; e-mail: statny.dozor@pdp.gov.sk, <https://dataprotection.gov.sk>.

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