

	<b>GENERAL PRIVACY POLICY</b>	Page: <b>1 of 5</b>
		Update date: 2023

## GENERAL PRIVACY POLICY

### Table of contents

GENERAL PRIVACY POLICY	1
Who is responsible for your personal data (Controller) and how to contact us?	2
How to get in touch about personal data issues?	2
On what basis and for what purpose do we process your personal data?	2
Information on the requirement to provide personal data	3
Who do we share your personal data with?	3
Transfer of data outside the European Economic Area	4
What rights do you have in relation to your personal data?	4
Profiling and automated decision-making	6

We make every effort to adequately safeguard your personal information and transparently present to you how we use it.

As of May 25, 2018, European data protection regulations in the form of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 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) (Official Journal of the EU L 119 of May 4, 2016, p. 1) ("GDPR") apply.

In this regard, we would like to inform you about the processing of your personal data that you provide to us in connection with your use of the Service, your desire to receive marketing communications from us, including offers regarding our products and services.

This Privacy Policy prepared by **Polski Holding Hotelowy sp. z o.o. with its registered office at ul. Komitetu Obrony Robotników 39G, 02-148 Warszawa**, registered in the National Court Register under No. 47774 (hereinafter referred to as the "**Controller**" or "**PHH**") is addressed to persons interested in the offer of our hotels and facilities and to persons using our Service. As the Controller of your data, we process them for the purposes and in the manner described below.

- Who is responsible for your personal data (Controller)?
- [How to get in touch about personal data issues?](#)
- [On what basis and for what purpose do we process your personal data?](#)
- [Information on the requirement to provide personal data](#)
- [How long do we store your data?](#)
- [Who do we share your personal data with?](#)

 <b>POLSKI HOLDING HOTELOWY</b>	<b>GENERAL PRIVACY POLICY</b>	<b>Page:</b>	<b>2 of 5</b>
		<b>Update date:</b> <b>2023</b>	

- [Transfer of data outside the European Economic Area](#)
- [What rights do you have in relation to your personal data?](#)
- [Profiling and automated decision-making](#)
- [Cookie Policy.](#)

### Who is responsible for your personal data (Controller) and how to contact us?

1. The Controller of the personal data is **Polski Holding Hotelowy sp. z o.o. with its registered office in Warsaw**, at **ul. Komitetu Obrony Robotników 39G, 02-148, Warszawa**, registered in the Register of Entrepreneurs of the National Court Register under the KRS number 0000047774, for which registration records are kept by the District Court for the City of Warsaw in Warsaw, XIV<sup>th</sup> Economic Department of the National Court Register, holding a NIP number: 5222482605, BDO: 000509129, share capital in the amount of PLN 1,911,499,700.00.

### How to get in touch about personal data issues?

For all personal data protection issues, including exercising your rights related to data processing, you can contact our Data Protection Officer by an e-mail at [iod@phh.pl](mailto:iod@phh.pl), or in writing to the address and details of the Controller indicated above.

### On what basis and for what purpose do we process your personal data?

1. Personal data will be processed by the Controller only for the purposes for which they were provided or collected.

3. Your personal data may be processed for the following purposes:

- a. to enable the use of the Service, i.e. the error-free presentation and optimization of the Service and the use of the functionality of the required cookies – on the basis of our legitimate interest (Article 6(1)(f) of GDPR),
- b. to provide the possibility to use the functionality of optional cookies – on the basis of your consent (Article 6(1)(a) of GDPR),
- c. for direct marketing of PHH, including presentation of services and products offered by PHH (except for marketing conducted via electronic means) – based on PHH's legitimate interest (Article 6(1)(f) of GDPR),
- d. to establish, defend and pursue claims (Article 6(1)(f) of GDPR).

	<b>GENERAL PRIVACY POLICY</b>	Page: <span style="float: right;"><b>3 of 5</b></span>
		Update date: 2023

### Information on the requirement to provide personal data

1. Provision of personal data is voluntary.
2. Failure to provide personal information may result in the inability to use the Service, to learn about PHH's offers and business information.

### How long do we store your data?

Your personal data will be kept for the period no longer than necessary for the purposes for which the data are processed, i.e.

- a. data processed in connection with enabling the use of the Service (obligatory cookies) – for the time indicated below in the section named as Cookie Policy,
- b. data processed in connection with the consent granted for the inclusion of optional cookies – until the consent is withdrawn, but no longer than for a period of 3 years.
- c. data processed for the purpose of defending or asserting claims – for the period specified by law for the statute of limitations for the particular type of claim.

### Who do we share your personal data with?

1. Your personal data may be transferred to entities processing personal data on behalf of the Controller i.e. service providers, including those supplying us with technical and organizational solutions to manage our organization (in particular, providers of IT, legal, accounting, auditing, security and data storage, hosting services), in which case such entities process data on the basis of a contract with the Controller and only in accordance with the Controller's instructions.

3. Your personal data, in the case of services provided by external companies, may be transferred to recipients located or processing personal data in countries outside the European Economic Area (EEA), only with the security measures required by GDPR as described below.

### Transfer of data outside the European Economic Area

1. In the case of transfers of your personal data to third countries, i.e. recipients located outside the European Economic Area in countries that, according to the European Commission, do not provide sufficient data protection (third countries that do not provide an adequate level of protection), the Controller transfers them using mechanisms that comply with applicable law, which include, among others, the following:

- a. "Standard Contractual Clauses" of the EU,
- b. conducting a TIA,

	<b>GENERAL PRIVACY POLICY</b>	Page: <b>4 of 5</b>
		Update date: <b>2023</b>

c. application of additional safeguards.

2. For more information on the existing safeguards implemented by the Controller to ensure that personal data are processed in accordance with the relevant regulations, and on possibilities to obtain a copy of the data, or about the place where the data are made available, please contact us as indicated in point 1 above.

### What rights do you have in relation to your personal data?

1. Access to personal data. You may exercise your right to access your data at any time.
2. Correction and completion of data. You have the right to request the Controller to promptly correct your personal data that are incorrect, as well as to request the completion of incomplete personal data.
3. The right to erasure. You have the right to request the Controller to immediately delete your personal data in any of the following cases:
  - a. personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
  - b. when you raise an objection to the processing referred to in (e) below and there are no overriding legitimate grounds for the processing of such data;
  - c. personal data are processed illegally;
  - d. when personal data must be deleted in order to comply with a legal obligation under European Union or Polish law.

However, the Controller will not be able to delete your personal data to the extent that the processing is necessary (i) to exercise your right to freedom of expression and information, (ii) to comply with a legal obligation requiring processing under European Union or Polish law, (iii) to establish, pursue or defend claims.

4. The right to restrict data processing. You have the right to request the Controller to restrict processing in cases when:
  - a. you question the accuracy of your personal data – for a period that allows the Controller to verify the accuracy of the data;
  - b. processing is unlawful, and you object to the deletion of your personal data, requesting instead a restriction on their use;
  - c. the Controller no longer needs the personal data for the purposes of processing, but the data are needed by the data subject to establish, pursue or defend claims;
  - d. you have objected to the processing referred to in e) below – until it is determined whether the legitimate grounds on the part of the Controller override your grounds for objection.
5. The right to object. You have the right to object to the processing of your personal data where the Controller processes the data for legitimate interests (if your particular

situation exists), including for direct marketing purposes. To the extent that data are processed for direct marketing purposes, an objection can be made at any time. To the extent that the data are processed for purpose other than direct marketing, the Controller may disregard the objection if it demonstrates the existence of valid legitimate grounds for the processing, overriding your interests, rights and freedoms, or grounds for establishing, pursuing or defending claims.

6. The right to withdraw consent. To the extent that the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent given before the withdrawal.
7. The right to data portability. To the extent that your data are processed for the purpose of entering into and performing a contract or processed on the basis of consent and the processing is carried out by automated means, you have the right to receive from the Controller in a structured, commonly used machine-readable format your personal data, which you have provided during the recruitment process. You also have the right to send this personal data to another controller.
8. The right to complain. You have the right to lodge a complaint about the processing of personal data by the Controller to the supervisory authority, which in Poland is the President of the Personal Data Protection Office.

In order to exercise the above rights, you should contact the Controller or the Data Protection Officer using the contact details indicated above or directly contact the supervisory authority (regarding the right to lodge a complaint with the authority).

### Profiling and automated decision-making

The data provided will not be subject to automated decision-making, but they may be subject to profiling for statistical and marketing purposes, which may lead to the adaptation of commercial offers sent and advertisements displayed to the user's preferences, as well as they also can be used to perform analytical and statistical activities.