



PRIVACY POLICY

COTTONINA HOTEL & MINERAL SPA RESORT

The purpose of this policy is to inform you about the principles of information protection, including personal information, personal data that we receive directly or indirectly from our Guests, including information obtained through this website <http://www.cottonina.pl/>.

This Policy is also a manifestation of the information obligation imposed on personal data controllers by the provisions of the GDPR.

I. The Administrator of Personal Data is Villa Cottonina Sp. z o.o. with its registered office in Świeradów Zdrój, ul. Sanatoryjna 7, a commercial law company entered into the Register of Entrepreneurs of the National Court Register by the District Court Wrocław-Fabryczna in Wrocław, IX Commercial Division of the National Court Register under the number KRS 335296, share capital (paid in full): PLN 65,000.00, NIP 6131552269, REGON 021020549, conducting business activity within the facility: Cottonina Hotel & Mineral SPA Resort, hereinafter also referred to as the Hotel.

II. We would like to inform you that personal data collected by us will be processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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), abbreviated to the 'GDPR'.

III. Contact with the data protection officer is possible in person in the hotel's headquarters or via e-mail: odo@cottonina.pl.

The Administrator has not appointed a Data Protection Officer.

IV. We collect personal data that are necessary to make a reservation of a stay, provide a comprehensive hotel service (within the framework of a contract already concluded), to answer the following questions on your request in electronic form and to send you an offer as part of marketing activities.

V. Providing personal data by the Guest and consent to their processing is necessary to make a reservation of stay and hotel service. Voluntary consent to the processing of personal data applies to marketing activities undertaken by the Hotel.

VI. We collect data during the process:

- a) reservation process - via the website,
- b) a reservation process carried out in person at the hotel, by telephone or e-mail,
- c) to report the Guest to the hotel,
- d) to subscribe to the newsletter;

We may also obtain data from our partners on booking portals (Booking.com, HRS, event organisers, etc.) if you have given your consent to do so.



VII. We process the following categories of data:

1. When booking via the website, it is possible to open a Guest's account or making a one-time reservation.

A. When creating an account on the hotel's website, the Guest sets his/her own password to the account, and provides the following data:

- a) Surname and forename,
- b) Address (street, house/apartment number, postcode and city),
- c) Telephone number,
- d) E-mail address,
- e) Entrepreneur's data (company, business address, TIN),
- f) Credit card number/bank account number;

The above mentioned data may be changed by the Guest himself after logging in to their account.

B. For a one-time reservation made by the website, the scope of collected data is the same as when creating an account, plus the country of residence of the guest.

2. During bookings made in person, by phone or e-mail, as well as during check-in, the following data are collected in the hotel:

- a) Name and surname,
- b) Address (street, house/apartment number, postcode and city),
- c) Telephone number,
- d) E-mail address,
- e) Entrepreneur's data together with VAT number (in case of VAT invoice for entrepreneur),
- f) Registration number of the vehicle belonging to the Customer (in the case of using from the hotel car park),
- g) Identity card number.

3. When a Guest provides us with his/her credit card details during the booking process, he/she will be redirected to the merchant's payment card site, which ensures the security of their transaction.

4. When you sign up for the newsletter, only your e-mail address is given. However, once this address has been obtained, the Hotel may have access to other Guest data, which it provides in connection with the e-mail settings made.

5. Children's data such as name, surname, nationality and date of birth will only be collected from their parents or legal guardians in order to determine their age and their rights of discounts in relation to this age and for the purposes related to the implementation of local fees (climate fee) and statistical fees (obligation of the Central Statistical Office).

6. During the stay at the hotel, due to the fact of monitoring the facility for security reasons, as well as the protection of property belonging to the hotel and its guests - personal data related to the image of persons staying at the hotel are processed.



7. When using the Hotel's website, additional information is automatically collected (IP address assigned to the computer from which the hotel's website was accessed, external IP address of the Internet service provider, domain name, browser type, access time, operating system type).

VIII. We use the collected data for the following purposes:

1. Fulfilling our obligations to Guests.
2. Handling of room reservations and requests for accommodation:
 - o Creation and storage of legal documentation in accordance with accounting standards.
3. Handling the Guest's stay at the Hotel:
 - o monitoring the use of services (telephone, bar, spa services, etc.)
 - o managing access to rooms,
 - o internal management of lists of guests who behaved improperly during their stay at the hotel (aggressive and anti-social behaviour, breach of contract with the hotel, breach of security rules, theft, causing damage and vandalism, payment problems).
4. Improvement of hotel service, especially:
 - o during the processing of Guest's personal data within the framework of our marketing programme - in order to conduct marketing activities, brand promotion, etc. and a better understanding of the requirements and wishes of our Guests,
 - o to better adapt our products and services to the requirements of our Guests,
 - o for matching commercial offers and promotional messages sent to Guests,
 - o to inform our Guests about special offers and new services of the hotel.
5. Managing relations with guests before, during and after their stay:
 - o using loyalty program service,
 - o segmentation operations based on booking history and guest preferences to send customized messages,
 - o the production of statistics and the calculation of trade results, as well as reporting,
 - o providing contextual data to be used by the offer proposals tool when a Guest visits the Hotel's website or books a room,
 - o sending newsletters, promotions and offers of tourist and hotel services, as well as telephone and electronic contact with the Guest,
 - o handling cancellation requests, promotions, travel offers and satisfaction surveys, to take into account the right to object.
6. Improvement of hotel services, in particular:
 - o handling complaints,
 - o offering loyalty benefits to Guests.
7. Ensuring security and improving the use of the Hotel's website:
 - o improvement of navigation,
 - o the implementation of safeguards and fraud prevention measures.
8. Ensuring compliance with legal provisions (e.g. for keeping accounting records).

IX. Access to Guests' personal data is only granted to authorized employees of the Hotel and Processors with whom separate agreements have been concluded (subcontractors providing services for the Hotel). The data may also be made available to entities authorized under applicable laws.



X. The Cottonina Hotel & Mineral Spa Resort takes appropriate technical and organizational measures, in accordance with applicable laws, in order to ensure maximum protection of personal data of our Guests.

XI. Guests at Cottonina Hotel & Mineral Spa Resort have the right to access, correct, transfer and receive a copy of the personal data processed by the Hotel. In addition, they shall have the right to withdraw their consent at any time, to request that their processing be limited, or to have their personal data deleted, and the right to be forgotten when processing personal data for marketing purposes.

XII. The Hotel undertakes - on the basis of automated processing of personal data, including profiling - decisions concerning your guests. These actions have been described for the purposes of personal data processing and are primarily intended to help us direct the personalised offer to the preferences of our Guests and to adjust the offer to those preferences and declared needs. The described processes are used by the Hotel within the functionality provided by cookies (the rules of operation of which we have described in point XVI), as well as within the newsletter.

XIII. Data collected for the purpose of providing hotel services will be processed for the period specified in the law, and in the case of data collected on the basis of consent - until this consent is revoked. However, the withdrawal of consent shall not affect the validity of processing operations undertaken before its withdrawal.

XIV. Data obtained from monitoring shall be deleted no later than 30 days from the date of their registration, except to protect them in order to preserve the course of an event causing personal injury or property damage. In such a case, the storage period depends on the period of pursuing claims by an authorised person or on the period indicated by the authorised state authority.

XV. If it is found that personal data are processed illegally, you have the right to lodge a complaint with the President of the Office for the Protection of Personal Data (PUODO).

I. Cookies policy

1. The Hotel's website (hereinafter referred to as the "Website") does not automatically collect any information, except for the information contained in cookies. The Guest is informed about their use during the first visit to the Hotel's website by displaying a message in a window. Acceptance of information such as direct access to the service - without changing the settings of the browser - means consent to the functioning of these files in the device of a person using the Hotel's website.

2. Cookies are IT data, in particular text files, which are stored in the end device of the Service User and are intended for use of the Website. Cookies usually contain the name of the website from which they originate, the duration of storage on the terminal equipment and a unique number.

3. The entity placing cookies on the end device of Service User and gaining access to them is the operator of the Service.

4. Cookie files are used in order to: a. adjust the content of the Website to the User's preferences and optimize the use of the Website; In particular, these files allow to recognize Service User's device and properly display the website, adjusted to his or her individual needs; b. create statistics that help to understand how Service Users use the websites, which enables improvement of their structure and content; c. maintain Service User's session (after logging in), thanks to which the User does not have to re-enter login and password on each subpage of the Service;

5. Within the Service two basic types of cookies are used: "session" cookies and "permanent" cookies. "Session" cookies are temporary files that are stored in the User's terminal device until the User logs out,

Villa Cottonina Sp. z o.o.

59-850 Świeradów-Zdrój, ul. Sanatoryjna 7, tel. +48 75 78 45 500, email: info@cottonina.pl
Spółka prawa handlowego zarejestrowana przez Sąd Rejonowy dla Wrocławia-Fabrycznej we Wrocławiu IX Wydział
Gospodarczy KRS pod numerem KRS 0000335296, NIP: 6131552269, REGON: 021020549



leaves the website or turns off the software (web browser). "Permanent" cookies are stored in the User's terminal device for the time specified in the parameters of cookies or until they are deleted by the User.

6. Within the Service the following types of cookies are used: a. "necessary" cookie files, enabling the use of services available on the Website, e.g. authentication cookies used for services requiring authentication within the Service; b. cookies used to ensure security,

e.g. used to detect fraud in authentication within the Service; c. "efficient" cookie files, enabling collection of information on the manner of using the Service's websites; d. "functional" cookie files, enabling "remembering" the settings and personalization of the User's interface, e.g. within the scope of a selected language or region from which the User comes, font size, website appearance, etc.;

7. In many cases, web browsing software (web browser) allows cookies to be stored by default in the User's terminal equipment. Users of the Service may at any time change the settings concerning cookies. These settings may be changed in particular in such a way as to block the automatic handling of cookies in the settings of the Internet browser or inform about their every time they are placed in the Service User's device. Detailed information about the possibilities and ways of handling cookies are available in the software settings (web browser).

8. The Operator of the Website informs that restrictions on the use of cookies may influence some of the functionalities available on the Website.

9. Cookie files placed in the end device of the Service User may also be used by advertisers and partners cooperating with the operator of the Website.

10. More information about cookies is available at <http://wszystkociasteczkach.pl> or in the "Help" section of the web browser menu.

XVII. Changes in the privacy policy of the Cottonina Hotel & Mineral SPA Resort.

The Cottonina Hotel & Mineral SPA Resort reserves the right to change, modify or amend this policy at any time without giving reasons.

Last updated: 10.09.2018 r.