

**STATEMENT**  
**Personal Data Policy – hotel Villa Breg**

DOO Breg, located in Vršac - Serbia, Goranska street bb, IN: 103094884 (further: hotel Villa Breg), respects privacy of every individual whose data are collected. We want to inform you which data we collect, in what purpose and the way how we do protect them and also your rights.

**Data Operator Manager and Legal base**

Hotel Villa Breg, as operator of your data, will respect your privacy and obliges to protect all your personal data. Collecting and data storage will be handled according to Law on the Protection of Personal Data ("Sl. glasnik RS", br. 87/2018).

**Implementation of data protection principles**

Hotel Villa Breg pays special attention to the principles of data processing:

- Processing will be possible if it is permitted by law and within the limits allowed by law
- We allow respondents to obtain their rights quickly and easily (certain information can only be restricted when required by law or when necessary to protect third parties)
- We inform respondents about personal data processing
- We process personal data for the purposes for which they were collected
- We store the data in a form that enables the respondents to be identified for as long as is necessary for the purposes for which the personal data are processed, and for longer only if permitted by law
- We process data if it is appropriate, relevant and limited to what is necessary. Special care shall be taken not to collect data for which there is no reasonable need for processing
- We take care of the accuracy and timeliness of the data and delete the incorrect data within the given possibilities.

Third parties, processing agents (for example, our business associates providing IT or other services), who store them in their databases until the processing is completed, may also have access to personal data of guests, as needed and to a limited access. Such subjects sign a detailed contract due to their authorities and obligations in processing personal data in accordance with the requirements of the Law.

### **Purpose of data collecting**

Hotel Villa Breg is obliged to collect some of your personal data for the purpose of fulfilling the accommodation agreement and the regulations of the hospitality industry, but some other or the same information may be collected by Hotel for other purposes, primarily for contact, or:

- fulfillment of the accommodation contract
- fulfillment of the requirements of laws and other applicable hospitality industry regulations
- for direct marketing purposes
- sending bids
- for the purpose of promotion and personalization of the service to you as a guest
- for the purpose of protecting the property and safety of individuals by implementing video surveillance measures.

Hotel Villa Breg guarantees that the collected data will be used only for the stated purposes. Hotel Villa Breg may use non-personalized data for statistical purposes.

### **Legal basis for data collecting**

Legal basis for above stated purpose of data collecting is:

- contractual
- primary interests of the respondents
- a legitimate interest which is stronger than the interest of the respondents or
- the consent of the respondents depending on the purpose of processing and the type of personal data.

### **Place of data collecting**

Hotel Villa Breg collects data during:

- reservation of accommodation (on line reservation, reservation via phone or email)
- check in on the hotel reception
- reservation of other services
- on the location under the surveillance system.

### **Time laps of data storage**

The data collected by hotel Villa Breg on the basis of a contract will be kept only to the necessary period of fulfilling the contract or providing the service.

### **Respondents' rights**

No matter what the data collection is, you can search for free at any time:

- access, modify or addition the data,
- erase of personal data in all databases,
- restrict the processing of your data or object to the processing of that data,
- That the data we have collected about you is passed on to you or to third parties, in accordance with positive legal regulations,
- If the data is given on the basis of consent, you can always withdraw that consent without any negative consequences,
- Right to file complaints with the supervisory authority - Commissioner for Information of Public Importance and Personal Data Protection.

Please send your written request to the Data Operator Manager: [sales@villabreg.com](mailto:sales@villabreg.com) or by post to the hotel Villa Breg, Goranska bb, 26300 Vršac, Serbia.

### **Personal data collected from persons who have booked guest accommodation**

Hotel Villa Breg, as the processing object, keeps your personal data that you must provide, in order to proceed with accommodation services, only for the purpose of fulfilling accommodation agreements and legal obligations, as well as collecting personal data related to the hospitality industry and may use for other purposes provided for by positive regulations. In case that you do not provide to the Hotel minimum information required for guest register in the authoritative registers, Hotel will not be able to provide you with accommodation services under the contract and the law.

Personal data, which hotel Villa Breg keeps during reservation or check in, are collected by hospitality law and regulations which determines accommodation industry and service to the guests. Necessary data are as follows (which can be changed):

- name and surname
- permanent address (for foreign guests and place )
- date and place of birth
- number and type of identification document

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- gender
- nationality
- room number
- arrival/departure date
- border crossing.

The above-mentioned data, hotel Villa Breg stores in its guest base and transmits data to the guest book system (electronic system for guest application) then further to competent bodies of the Republic of Serbia. Therefore, the above-stated data has to be kept in the system for indefinite period of time.

Apart from that, in order to meet the contractual obligation, Hotel gathers the following information at the reception desk:

- e-mail
- phone number.

The rest of the data related to the circumstances of your stay at the hotel such as: the way of travelling, who you travel with, marital status, number of children, pets, other interests, could be gathered as well if they are directly connected with the provision of accommodation services and will be deleted upon your request after you leave the accommodation facility.

Apart from the above-mentioned, the person booking the accommodation or the guest could give a particular permit, consent that his/her information such as:

- first name
- last name
- e-mail
- date of birth
- country
- other personal data gathered during your stay (for example phone number, sex, number of children, marital status, language, pets, interests and activities during your stay, the way of travelling, accommodation preferences, destination preferences etc..)
- other personal information gathered during your internet search (so called “cookies”) including IP address

could be gathered and used for further profiling of the respondent and for contacting and informing him/her on special and personalized offers, news and events organized by hotel Villa Breg through online channels (e-mail, web, internet promotion). In this case, a person whose personal data is being processed is entitled to withdraw his/her consent at any moment, including the processing with a view to creating the profile, to that

extent to which it is connected to direct marketing, either in relation to the initial or further processing. Consent withdrawal can be performed at any time and it is free of charge so is the right to change or delete data at any time.

### **Cookies and internet technologies**

As it is the case with many other portals, we as well can use “cookies” (small files stored on your computer during the access to our websites in order to provide basic or additional functionalities of these sites) and other technologies that facilitate the delivery of the content of your areas of interest, reservation or request processing and/or analysis of the features of your visits. Cookies cannot be used for revealing your personal identity.

### **We use different types of cookies:**

- Essential cookies – are necessary for the web site functioning as the site cannot work without them. This means the website cannot be opened or displayed without these cookies. These cookies are used either for conveying the communication or they are necessary for provision of services of information company that was explicitly asked by the user of these services. Also, these cookies will help us provide the basic analysis of the website in order to improve the performances of the site by means of completely anonymous data or based upon your personal data or data that could be connected to you in any way. We do not need to ask for your consent for these cookies.
- Functional cookies – we use these cookies for more upgraded websites analysis. These cookies are used for the analysis of the user’s behavior, and based upon the anonymous data we can determine which visitors want to examine them the most, thus we could adjust the web location and make its content and functionality more simple for use. It is necessary that we obtain your consent for these cookies.
- Marketing cookies – By analyzing your interests and wishes, we use these cookies in order to provide you with interesting information and create adapted offers for using the website of the hotel. We need to obtain your consent for these cookies.

In case you changed your mind on cookie settings on the website, you can change them at any moment: (link to the field for cookie approval). You may always delete the cookies stored on your computer whereby you would disable the processing of your personal data through technologies. Each web browser has its own procedure of deleting the cookie, and below you may find the procedures for some of the most popular web browsers:

Google Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform=Desktop&hl=en>

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Mozilla Firefoks:

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Microsoft Edge:

<https://support.microsoft.com/en-us/help/4468242/microsoft-edge-browsing-data-andprivacy-microsoft-privacy>

Our websites contain the links to other websites. Hotel Villa Breg is not responsible for respecting the privacy on other websites.

### **Video surveillance system**

Hotel Villa Breg as the Processing manager has both the legitimate interest to apply video surveillance measures in order to protect the property of the persons in comparison to certain work positions, and the legal obligation to set the video cameras recording the employees and all persons moving within the area of the surveillance camera.

Hotel Villa Breg is aware of the fact that video records contain personal information of all persons moving within the sight of the camera and therefore they are kept with particular attention, and it has the security and availability system and the policy on deletion of the information regulated by the **Rulebook on information security**.

Video records are re-recorded on regular basis so that they are automatically deleted 30 days after the very recording at the latest. In exceptional cases, video records are kept longer if there is evidence in the proceeding before the competent state bodies. These video records will be kept in special data warehouse with extremely limited access.

In case of judicial and/or criminal proceedings, hotel could use the above-mentioned video records. Insight into personal data found on video records could have third parties, processing executors, our contractual partners that are registered and competent for provision of services related to protection of persons and property and who do not use by themselves the mentioned data in any way, but only for security of monitoring and notification systems.

In order to exercise your rights or in case you have additional questions related to protection of your personal data, do not hesitate to contact us via e-mail: [sales@villabreg.com](mailto:sales@villabreg.com) or by post on our address hotel Villa Breg, Goranska bb, 26300 Vršac, the Republic of Serbia. We will respond to your request at our earliest convenience.

Direktor:



Zvezdan Milanović

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Statement Personal Data Policy

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