



ROT-TURIST”d.o.o. poduzeće za turizam i ugostiteljstvo, Vukovarska 148,“
21000 SPLIT, CROATIA, tel/fax 453 330 / 453 332, OIB:10341944075, žiro račun
HR8523600001102208094
HOTEL “MORE” Šetalište pape Ivana Pavla II 27, 21000 Split, Croatia
tel/fax 385(0)21 462 112, 385(0)21 462 201

PRIVACY POLICY HOTEL "MORE" SPLIT

Introduction

Hotel More is committed to protecting our customer privacy and takes its responsibility regarding the security of customer information very seriously. We will be clear and transparent about the information we are collecting and what we will do with that information.

This Policy sets out the following:

- What personal data we collect and process about you in connection with your relationship with us as a customer and through your use of our website, e-mail communication, our partners' mobile applications and online services as well as through direct telephone calls or upon arrival to our hotel reception
- Where we obtain the data from;
- What we do with that data;
- How we store the data;
- Who we transfer/disclose that data to;
- How we deal with your data protection rights;
- How we comply with the data protection rules.

All personal data is collected and processed in accordance with Croatian and EU data protection laws.

Data Controller

“ROT-TURIST” (referred to as “we”, “us”, “our” or “ROT-TURIST” in this policy) in this policy primarily refers to ROT-TURIST Ltd., the main operating company of the ROT-TURIST group, and, where appropriate, to other companies in the ROT-TURIST group or other entities over which ROT-TURIST exercises management control. ROT-TURIST Ltd. is the “data controller” of all personal information that is collected and used about ROT-TURIST customers for the purposes of operating of the hotel "More" and its company.

What personal data we collect

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, booking reference number, payment details and information about your access to our website.

We collect your personal information data when booking accommodation (directly or indirectly through our reliable booking partners), using our web-site, writing an e-mail or using applications of our business partners, as well as when making a phone call or by signing the entry form at the hotel reception.

Specifically, we may collect the following categories of information:

- Name, home address, nationality, date of birth, gender, passport or ID number, expiry date and country of issue
- Credit/debit card or other payment details;
- Company name, address, VAT number (upon your request)
- The communications you exchange with us or direct to us via letters, emails, calls, and social media.



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What do we use your personal data for, why and for how long

Your data may be used for the following purposes:

- Booking, checking-in and checking-out into our hotel accommodation service program called Synesis, as well as for creating a receipt for the services you have asked for
- Registering into Croatian information system for check-in and check-out of tourists called e-Visitor. We are obliged to provide personal data for safety and customs reasons
- Contacting you in the event of any change or cancellation: we send you communications about the services you have asked for and any changes to such services. These communications are not made for marketing purposes and cannot be opted-out of
- Credit or other payment card verification/screening: we use your payment information for accounting, billing and audit purposes and to detect and / or prevent any fraudulent activities
- Administrative or legal purposes: we use your data for order to deal with a dispute or claim.
- Security, health, administrative, crime prevention/detection: we may pass your information to government authorities or enforcement bodies for compliance with legal requirements.

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the signature you have signed at the entry form or on accepting further e-mail communication with us.

We may also process your personal data for one or more of the following:

- To protect your vital interests (e.g. in case of a medical emergency);
- It is in our legitimate interests in operating as a hotel (e.g. for administrative purposes).

Only children aged 16 or over can provide their own consent. For children under this age, consent of the children's parents or legal guardians is required.

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

When we no longer need your personal data, we will securely delete or destroy it.

Security of your personal data

We follow strict security procedures in the storage and disclosure of your personal data, and to protect it against accidental loss, destruction or damage in accordance with law provision and instructions of Croatian Personal Data Protection Agency.

We may disclose your information to trusted third parties for the purposes set out in this Privacy Policy. We require all third parties to have appropriate technical and operational security measures in place to protect your personal data, in line with Croatian and EU law on data protection rules.

Sharing your personal data

Your personal data may be shared with the following third parties that ROT-TURIST Ltd. has contractual relations, and these are:



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- GRADEX Ltd. Split, a bookkeeping service
- Our trusted third party partners (identified on our website) who offer travel services on our website: If you choose to purchase products or services offered on our websites by third parties such as BOOKING.COM or EXPEDIA.COM you may be a customer of both ROT-TURIST and these third parties, and we and our partners may collect and share information about you, such as your contact details and your billing information. We are not responsible for third parties' use of your personal data where such use is permitted for their own purposes. Please consult their privacy policies for further information.
- Credit and debit card companies which facilitate your payments to us, and anti-fraud screening, which may need information about your method of payment and booking to process payment or ensure the security of your payment transaction.
- Legal and other professional advisers, law courts and law enforcement bodies in order to enforce our legal rights in relation to our contract with you.

We shall give your personal data to the third parties only for the purposes given in this policy and they will not be used for any other reasons.

We are not responsible for storing and using your personal data by the accommodation agencies and banks through which you have booked your accommodation and payment in our hotel. We declare that we will not transfer your personal data across the national border.

Data Protection Officer

We have appointed a Data Protection Officer ("DPO") to oversee compliance with this policy.

Data controller is obliged to process personal data for specific purposes. The data must be accurate, complete and up-to-date. Data controller is also obliged to inform the Personal data protection agency about every personal data processing (exceptions are prescribed by the law) by delivering notifications on the records of personal data filing systems, which they compile, to the Central Register.

The Central Register maintained by the Agency is publicly available and offers information on the records on personal data filing systems - e.g. who is processing your personal data, on which basis and for what purpose, which data, the art of data collection and storing, to whom data are being disclosed for use, if they are transferred across the national border.

Your Data Protection Rights

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- **Request access** to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- **Object to processing** of your personal information where we are relying on a legitimate interest.



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- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request transfer** of your personal information in an electronic and structured form to you or to another party. This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you want to exercise any of these rights, then please submit a completed online request form available at the following link dpo.hotelmore@gmail.com or contact our DPO by post at ROT-TURIST’s Data Protection Officer, ROT-TURIST Ltd., Vukovarska 148, 21000 Split, Croatia.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Changes to Privacy Policy

Our Privacy Policy may change from time to time and any changes to the statement will be communicated to you by way of an e-mail or a notice on our website.



Right to Object

You have the right to object at any time to the processing of your data to Croatian Personal Data Protection Agency as follows:

- personally or in a written form addressed to:

Agencija za zaštitu osobnih podataka, Martićeva 14, 10 000 Zagreb, HRVATSKA

- by fax: +385(0)146-090-99
- by e-mail : azop@azop.hr

Your request for data protection should be clear and complete.

These data should be given:

- name, surname / name and address – these data are needed to carry out the procedure and to deliver you an answer
- what rights have been violated
- if needed you will be asked to deliver copies of the files and documents to establish a violation in the processing of your personal data.