



# Information obligation of the Operator

(hereinafter referred to as "the principles related to the protection of personal data")

According to Article 13 of the Regulation 2016/679 of European Parliament and Council of the European Union on the protection of natural persons with regard to processing of personal data and on the free movement of such data (hereinafter referred to as the "Regulation") and in accordance with Section 19 of Act 18/2018 in Coll. on the protection of personal data (hereinafter referred to as "Act").

## I. Who are we?

### OPERATOR:

Company name: RELAS s.r.o.

Place of business: Vinohradnícka 6, 971 01 Prievidza

Registration number: 36342157

registered in Business register of Slovak Republic in District Court in Trenčín, Section: Ltd, Insert no.: 12402/R

## II. How can you contact us?

Contact details of the Operator: A responsible contact person: Ing. Rudolf Lukačka – Director of the hotel



+421903706092



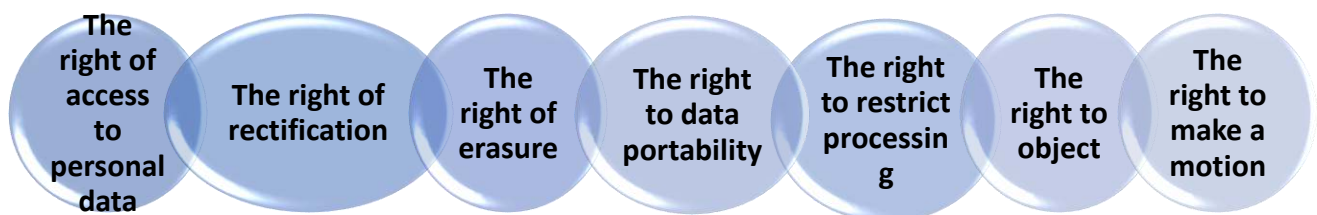
riaditel@hotelbelassi.sk



Vinohradnícka 6, 971 01 Prievidza

## III. What are your rights?

### Rights of data subjects:



Data subjects are natural persons, whose personal data we process. In particular, but not exclusively, these people are employees and clients. Such data subjects, whose personal data are processed in our information systems for specifically defined purposes, have rights which they can exercise in written way or electronically at the operator's contact person. YOU are also the data subject.

#### The right of access to personal data

It is the right to **obtain the confirmation** from the operator **whether the personal data of the data subject** who has exercised his right as well as **the right to access such data that are being processed**. As a data subject, you are entitled to access information about: the purposes of processing, the category of personal data concerned, the range of recipients, the processing and retention period, the progress of each automatic processing, or the consequences of such processing and others (Article 15 of the Regulation). As an operator, we have the right to use all reasonable measures to verify the identity of the data subject requesting access to data, particularly in connection with online services and identifiers. At the request of the data subject, the operator shall issue a confirmation that personal data concerning the data subject are being processed. If the operator processes such data, he will issue a copy of personal data of the data subject upon request. The first copy is free of charge. For any additional copies requested by the data subject, the operator will charge a fee corresponding to the administrative costs related to issuing the copy of personal data. If the data subject requests information electronically, it will be provided in a commonly used electronic form, by email, unless otherwise requested.

#### The right of rectification

The data subject can exercise this right if the operator keeps incorrect personal data records of the data subject. The data subject can also exercise the right to **complete** incomplete data by the operator. The operator shall correct or complete personal data without undue delay after the request of the data subject.

#### The right to restrict processing

It can be applied if, as a data subject, you challenge correctness of personal data or other requisites within the meaning of Article 18, recital 67 of the Regulation by temporary transfer of selected personal data to another processing system, preventing users from accessing selected personal data or temporary removing of processing.

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### The right of erasure

It is "forgetting" of those personal data which are related to the data subject. However, this right of the data subject is, by its nature and gravity, limited by the setting of the further prerequisites. It means that the operator shall delete personal data without undue delay after exercising this right by the data subject if any of the following conditions are met: a) personal data are no longer necessary for the purposes for which they were obtained or otherwise processed; b) the data subject withdraws his consent on the basis of which processing is carried out; c) the data subject objects to processing of personal data; d) personal data were processed unlawfully; e) the reason for the erasure is the fulfilment of the obligation of the law, specific regulation, or international treaty binding the Slovak Republic; or f) personal data were collected in connection with the offer of Information Society services to a person under 16 years of age.

The data subject **shall not have the right of erasure** of personal data provided if their processing is necessary:

a) to exercise the right of freedom of expression and information; b) to fulfil the obligation under a law, special regulation or an international treaty binding the Slovak Republic or to fulfil a task performed in the public interest or in the exercise of public authority entrusted to the operator; c) for reasons of public interest in the field of public health; d) for archiving purposes of the public interest, for scientific or historical research or for statistical purposes, where the right of erasure is likely to thwart or seriously makes harder to achieve goals of such processing, or e) to establish, enforce or defend legal claims.

The operator shall erase personal data of the data subject upon request without undue delay after having assessed that data subject's request is justified.

### The right to data portability

As the data subject, you have the right of transfer of personal data that you have provided to the operator to another operator in commonly used and machine-readable form, provided that personal data have been obtained with the consent of the data subject or under contract and they are processed by automated systems.

### The right to object

The data subject has the right to object at any time to the processing of his personal data related to his particular situation. He can object to processing of his personal data on the basis of: a) legal document (enforceable right) of performance of tasks carried out in the public interest or in the exercise of public authority, or b) legal document (enforceable right) of the legitimate interest of the operator; b) processing of personal data for direct marketing purposes; c) processing for purposes of scientific or historical research or for statistical purposes. We will review your dispute in a reasonable time. In this case, we shall not further process personal data unless we demonstrate the necessary legitimate interests in processing of personal data that override rights or interests of the data subject or reasons for a legal claim.

### The right to make a motion

The data subject has the right to make a motion to initiate proceedings of the Office for Personal Data Protection of the Slovak Republic if he/she believes that his/her rights in the area of personal data protection have been violated.

- **The purpose of processing personal data** is the reason for which the operator processes personal data of data subjects in the information systems on specific legal bases. Any processing of personal data is based on a specific legal basis and for a specific, legitimate and explicit purpose. In order to maintain transparency or ensure the clarity of the information stated, particular legal bases and the purposes for processing of personal data are listed separately at the end of these principles of the general data protection and divided according to different information systems.

- In order to maximize the protection of your personal data, we, as the Operator, have adopted appropriate personnel, organizational and technical measures. Our goal is to prevent or reduce the risk of leakage, misuse, disclosure or other use of your personal data to the largest extent possible. **If there is a fact that is likely to lead to a high risk to the rights and freedom of natural persons, you will be immediately contacted as a data subject (Article 34 of the Regulation).**

- In order to preserve the principles of personal data processing laid down by the Regulation as well as the law, in particular the principles of minimizing personal data, **we require only those personal data from you, as data subject, that are a necessary legal or contractual requirement for fulfilling the purpose of their processing. Please note that failure to provide these mandatory data necessary for the conclusion of the contract may result in not concluded contract.**



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V. Why do we process your personal data? What justifies us to do so? How long does such proceeding take? Who do we provide this data to? Do we monitor your behaviour?...or in other words:

The purposes of processing personal data, legal basis, the range of recipients, retention period, information regarding cross-border data transfer, categories of data subjects and information regarding automated decision-making, including profiling sorted out by particular information systems:

Explanation of terms:

**The purpose of processing personal data – Why do we process your personal data?**

**Legal basis – What justifies us to do so?**

**The range of recipients – Who do we provide these data to?**

**Cross-border data transfer – Do we send your data abroad?**

**Time limits for the erasure of personal data – How long do we process your personal data?**

**Automated decision-making, including profiling – Do we monitor your behaviour?**

**Categories of personal data – What data do we process?**

### ECONOMIC-ACCOUNTING AGENDA

#### The purpose of processing personal data

*The purpose of processing personal data is processing of orders, incoming invoices and invoicing to customers, contact with the bank, cash management, securing cash receipts and revenues, stock management, asset records (including automatic depreciation) and small assets, minor tangible capital assets, administration of simple, or double-entry bookkeeping by the organization.*

#### Legal basis

*Act No. 431/2002 Coll. on accounting, as amended  
Act No. 222/2004 Coll. on Value Added Tax, as amended  
Act No. 18/2018 Coll. on personal data protection and on amendments to certain laws,  
Act No. 145/1995 Coll. on administrative fees, as amended  
Act No. 40/1964 Civil Code, as amended,  
Act No. 152/1994 Coll. on the Social Fund and on the amendment of Act No. 286/1992 Coll. on Income Tax, as amended,  
Act No. 311/2001 the Labour Code, as amended  
Act No. 400/2009 Coll. on the Civil Service and on amendments to certain acts, as amended  
Act No. 513/1991 Civil Code, as amended,  
Act No. 583/2004 Coll. on budgetary rules of territorial self-government and on amendments to certain laws*

#### The range of recipients

*Competent tax authorities, Financial Directorate and other public authorities under applicable law  
Agent in accounting  
The relevant bank of the operator  
Authorized staff*

#### Time limits for the erasure of personal data

<i>Annual accounts</i>	10 years
<i>Invoices</i>	10 years
<i>Internal documents</i>	10 years
<i>Cash register</i>	10 years
<i>Debt collection</i>	5 years
<i>Bank statements</i>	10 years



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## Categories of data subjects

*Natural persons – Employees of the operator  
Suppliers and customers – natural persons, self-employed persons  
Employees of suppliers and customers,  
Representatives of suppliers and customers*

Information on the existence of automated decision-making, including profiling - *Not applicable*

Cross-border data transfer - *Not applicable*

## REGISTRATION OF ACCOMMODATED GUESTS

### The purpose of processing personal data

*The purpose of processing personal data within the scope of the agenda is to provide accommodation services. The main purpose is to register guests in accordance with the relevant legal regulations. As a part of precontractual relations, the operator processes personal data of people who booked accommodation by telephone or e-mail order.*

### Legal basis

*Act No. 253/1998 Coll. on Reporting of residence of citizens of the Slovak Republic and the Register of citizens of the Slovak Republic*

### The range of recipients

*– Bodies of state administration, public authorities and public administration according to the relevant legislation*

### Time limits for the erasure of personal data

*According to the registration order – 5 years*

### Categories of data subjects

*Guests, people interested in accommodation*

Information on the existence of automated decision-making, including profiling- *Not applicable*

Cross-border data transfer - *Not applicable*

## REGISTRATION OF FOREIGNERS

### The purpose of processing the personal data

*The purpose of processing personal data within the scope of the agenda is to fulfil the obligations of the operator pursuant to Section 1113 of Act No. 404/2011 of Coll. on the stay of foreigners and on amendments to certain laws in connection with the fact that the operator also accommodates guests – foreigners. For this purpose, he/she mentions personal data of the foreigner in the book of accommodated guests to the extent stipulated by law.*

### Legal basis

*Act No. 404/2011 Coll. on the stay of foreigners and on amendments to certain laws in connection with the fact that the operator also accommodates guests – foreigners. For this purpose, he/she mentions personal data of the foreigner in the book of accommodated guests to the extent stipulated by law.*

### The range of recipients

*Bodies of state administration, public authorities and public administration according to the relevant legislation, The Units of Foreign Police*

### Time limits for the erasure of personal data

*According to the registration order – 5 years*

### Categories of data subjects

*Accommodated guests – foreigners*

Information on the existence of automated decision-making, including profiling - *Not applicable*

Cross-border data transfer - *Not applicable*

## RECORDING OF LEGAL COSTS

### The purpose of processing personal data

*The purpose of processing personal data within the scope of the agenda is to apply the costs incurred during the provision of the accommodation by the operator.*

### Legal basis

*Eligible interest within the meaning of Article 6. Section 1 and letter. f) of the Regulation. The main legitimate interest is the protection of the operator's assets and his financial interests.*

### The range of recipients

*Agent for evidence of economic-accounting agenda  
Authorized staff*

**Time limits for the erasure of personal data**



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*According to the registration order – 5 years*

**Categories of data subjects**

*Guests – natural persons*

Information on the existence of automated decision-making, including profiling - *Not applicable*

Cross-border data transfer – *Not applicable*

If you are interested in further information regarding the processing of personal data, as well as in the case of requests or exercise of the rights of the data subject, please contact the contact person.