

➤ **PRIVACY POLICY OF HOTEL COSMOPOLITAN AD**

Adopted on 25.05.2018

Approved by: Krasimir Angelov Dakov / manager /

An official for the protection of personal data: Hristina Mitkova Dakova /manager/

Hotel Cosmopolitan AD, UIC: 201344433 with seat and address of management: Ruse, Dobri Nemirov 1 str, is the administrator of personal data within the meaning of Regulation (EC) 2016/679 (GDPR) and the law on the protection of personal data. The privacy policy of Hotel Cosmopolitan AD is intended to inform individuals (data subjects) for the purpose and the reasons for the processing of personal data and the means of exercising rights by data subjects, categories of recipients that may be disclosed, the mandatory or voluntary nature of providing the data.

1. General information

1.1 The Privacy Policy of Hotel Cosmopolitan AD is prepared and based on the requirements and principles for the protection of personal data adopted by Regulation (EC) 2016/679 (General Regulation on data protection – GDPR) on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

1.2 By the purposes of Regulation (EC) 2016/679, definitions used in this policy have the following meaning:

Personal data means any information relating to an identified natural person or a natural person who can be identified (“data subject”); a natural person who can be identified is a person who can be identified directly or indirectly, in particular by an identifier such as your name, identification number, location data, online ID, or by one or more signs, specific physical, psychological, mental, economic, cultural or

social identity of this individual

Processing means any operation or set of operations carried out with personal data or set of personal data by automated or other means, such as collection, recording, organization, structure, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise so that data becomes available, alignment or combination, restrict, delete or destroy.

Register of personal data means any structured set of personal data, access to which is carried out according to specific criteria, whether centralized, decentralized or dispersed according to a functional or geographical basis.

An administrator is any natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by the EU law or the law of the Republic of Bulgaria, the administrator or the specific criteria for his determining may be laid down in the EU law or the law of the Republic of Bulgaria.

The data subject is an individual who is identified or which can be identified on the basis of certain information constituting personal data directly or indirectly;

2. Principles governing the processing of personal data

2.1 Hotel Cosmopolitan AD processes personal data by applying the appropriate technical and/or organizational measures. When processing, the following principles are complied with:

- Data is collected for specified legitimate purposes and not processed in a way incompatible with those purposes (“appropriate to the processing of personal data and purpose limitation”)
- Lawfully, in good faith and transparent in respect of the data subject, the processing of personal data (legality, fairness and transparency)
- Proportionality and restriction on processing of personal data in connection with the purposes for which the data are processed (“reduce to minimum the data”)
- Restriction of storage for a period not longer than is necessary for the purposes for which personal data is processed (“storage limit”)
- Processing in such a way as to ensure an adequate level of security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or deterioration by applying the appropriate technical or organizational measures (integrity and confidentiality)
- Accuracy and timeliness of processing of personal data.

➤ **3. Grounds for processing personal data:**

3.1 Hotel Cosmopolitan AD processes personal data on the basis of:

- Processing is necessary for compliance with a legal obligation which applies to Hotel Cosmopolitan AD as a data administrator
- Processing is necessary for the performance of the contract with the Hotel Cosmopolitan AD, in which the data subject is a party or take steps at the request of the data subject prior to entering into a contract
- The data subject has given consent to the processing of his personal data to one or more specific objectives. In cases where personal data are processed only on the basis of consent, the data subject has the right to withdraw their consent at any time. Withdrawal of consent of the data subject is not applicable in cases where processing of the data is based on a legal or contractual basis.

Hotel Cosmopolitan AD processes personal data itself or through the entrust of the processors in a lawful order.

4. Hotel Cosmopolitan AD, as an administrator, does not process personal data such as racial or ethnic origin, political opinions, religious or philosophical beliefs or trade-union membership as well as the processing of genetic data, biometric data for the purposes only of the identification of the individual data about health or sex life details or sexual orientation of the individual, unless the data subject has given his explicit consent of the processing of the personal data for one or more specific objectives.

5. Purpose of the processing of personal data

5.1 Hotel Cosmopolitan AD as a company operating in the field of hospitality and tourism, processes data for the following purposes:

- Accommodation
- Meal organization in the restaurants
- Use of Spa, Wellness and fitness facilities
- Additional tourist services (transportation, excursions and other)

If you decline to provide personal data, Hotel Cosmopolitan AD won't be able to provide requested hospitality and tourism services or carry out the transaction, as far as the processing of personal data is mainly in the implementation of legal and regulatory obligations established by the company (except in cases where the personal data is processed on the basis of different than the legal)

6. Personal information that individuals provide to Hotel Cosmopolitan AD when submitting the request for the provision of hospitality and tourism service and/or perform other transactions are processed for the purpose of analyzing whether these services may be provided to people for the period concerned, in order to protect their health, as well as for proper identification of the parties to the transactions carried out in pursuance of legal obligations and motion.

7. The processing of personal data is often performed by legislatively established duties of Hotel Cosmopolitan AD arising from legal requirements governing the hotel and other relevant businesses, financial and accounting activities, the activities on the prevention of money laundering for the purposes of the purpose of the tax-insurance procedure code, pension, health and social insurance activity, the activity of management of human resources, etc.

8. Except in the cases where it is necessary for the performance of the reference obligation of the administrator, processing personal data is permitted and when it is necessary for the performance of obligations under the contract with Hotel Cosmopolitan AD, in which the individual to whom the data relate is a party, as well as for actions prior to the conclusion of a contract with the Hotel Cosmopolitan AD, undertaken at the request of the person or, where the individual to whom the data relate has given explicit consent to the processing.

In addition to the described cases, the processing of personal data of the data subjects is permissible in the case of a legitimate interest of Hotel Cosmopolitan AD or a third party, where they have an advantage over the interests of fundamental rights and freedoms of the data subject /client/, for example in order to prevent crimes including fraud, prevent, money laundering and terrorist financing, and other lawful purposes

9. Personal data of the subjects is stored within the statutory deadlines in accordance with the requirements of applicable special laws.

10. Persons under 18 (eighteen) years of age are data subjects with the right to a higher level of protection of their personal data. In relation to the direct provisions of child information services, child data processing is lawful if the child is at least 16 years of age. If the child is under 16, this processing is lawful only if and to the extent that such consent is given or permitted by the parent's parental responsibility.

11. Rights of Data Entities (Customer Individuals to whom data refer)

11.1 Awareness - the data subject has the right to information including: identification data of Hotel Cosmopolitan AD, hotel contact details and the data protection officer; The purposes and legal basis for the processing; Recipients or categories of recipients of personal data, if any; The intention of the controller to transmit the personal data to a third country / third country (where applicable); The period of storage of personal data; The existence of automated decision making, including profiling (if any); Information about all rights that the data subject has; The right of appeal to the supervisory authority.

11.2 Access to their personal data - the data subject has the right to obtain from Cosmopolitan Hotel AD confirmation whether personal data related to him are being processed and if so he has access to the data and the following information: Target of processing; Relevant categories of personal data; Recipients or categories of recipients of personal data, if any; The intention of the controller to transmit the personal data to a third party (where applicable); The period of storage of personal data; Existence of the right to correct personal data, as well as the right to object to the processing of personal data; The existence of automated decision making, including profiling (if any); Information about all rights that the data subject has; The right of appeal to the supervisory authority.

1.3 Correction (if the data are inaccurate) - the data subject is entitled to request from Hotel Cosmopolitan AD to correct inaccurate personal data related to it without undue delay.

11.4 Deletion (right to be forgotten) - The data subject may request the Hotel Cosmopolitan AD deletion if one of the following conditions is met:

- Personal data is no longer needed for the purposes for which it was collected or otherwise processed;
- The data subject withdraws his / her consent, on which the processing of the data is based, and no other legal basis for the processing / processing under a statutory obligation of Hotel Cosmopolitan AD concluded with the company /;
- The data subject objects to the processing and there are no legitimate grounds for processing that have an advantage;
- Personal data has been tampered with;
- Personal data must be deleted in order to comply with a legal obligation under European Union law or the law of the Republic of Bulgaria which applies to Cosmopolitan Hotel AD as Administrator;
- Personal data were gathered in connection with the provision of child information services and consent was given by parental responsibility for the child.

11.5 Restriction on the part of Hotel Cosmopolitan AD or the personal data processor - the possibility of using this right requires specific conditions such as:

- The accuracy / timeliness of personal data is disputed by the data subject. In this case, the limitation of the processing is for a period that allows Hotel Cosmopolitan AD to check the accuracy of the personal data;
- Processing is illegal, but the data subject does not want to delete the personal data, but instead requires a limitation of their use;
- Cosmopolitan Hotel AD needs no more personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or protection of legal claims

- The data subject has objected to the treatment pending verification of whether the legitimate grounds of Hotel Cosmopolitan AD have an advantage over the interests of the data subject.

11.6 Portability of personal data between individual administrators - the data subject is entitled to receive personal data concerning him / her which he has provided to Hotel Cosmopolitan AD in a structured, widely used and machine-readable format and has the right to transfer such data to another administrator without hindrance by the company to which the personal data are provided when the processing is based on consent or a contractual obligation and the processing is done in an automated manner. When exercising its right to data portability, the data subject is also entitled to receive a direct transfer of personal data from Hotel Cosmopolitan AD to another administrator when this is technically feasible.

11.7 Subject to the processing of his or her personal data, data subjects have the right to **object** to Hotel Cosmopolitan AD against the processing of their personal data and the hotel will terminate the processing unless it proves there are convincing legal grounds for the processing that have priority over the interests, rights and freedoms of the data subject or for the establishment, exercise or protection of legal claims.

In case of objection to the processing of personal data for direct marketing purposes, Hotel Cosmopolitan AD will terminate the processing immediately.

11.8 The data subject may also not be the subject of a decision based solely on **automated processing** involving profiling that produces legal consequences for the data subject or similarly affects him or her significantly;

11.9 Legal or administrative protection where the rights of the data subject have been violated - if the data subject considers that his / her data protection and privacy rights have been violated, he / she may file a complaint with the relevant supervisory authority -Privacy Committee or seek legal rights.

12. Disclosure of personal data

12.1. Hotel Cosmopolitan AD may disclose personal data to the following categories of persons:

- The persons to whom the data relate, namely: persons using tourist services or products or applying for tourist services as well as persons who are parties to tourist and / or other commercial transactions and contractual relations with the hotel;
- Persons who have the right of access to personal data by virtue of a law or other normative act;
- Persons for whom the right arises under a contract concluded with Hotel Cosmopolitan AD.

13. Process for exercising the rights of data subjects:

13.1 Natural persons (data subjects) are entitled at any time to request from Cosmopolitan Hotel AD:

- confirmation of whether the data relating to them are processed by the hotel, the purposes of the processing, the data categories and the recipients of the data or the categories of recipients to whom the data are disclosed;
- the hotel to send a message to them in an intelligible form containing the personal data being processed and any available information about the source of that data;
- Information on the logic of any automated processing of personal data (if available) relating to natural persons, at least in the case of automated decisions under the General Regulation on Personal Data Protection and the Personal Data Protection Act;

13.2 On request, Hotel Cosmopolitan AD provides the information described above free of charge.

13.3 Physical persons are entitled at any time to request from Cosmopolitan Hotel AD to:

- delete, correct or block their personal data, the processing of which does not meet the requirements of the current legislation
- notify third parties to whom the personal data of individuals have been disclosed of any erasure, correction or blocking performed in compliance (except when this is impracticable or involves excessive effort for the company).

13.4 The natural persons (data subjects) shall exercise their rights by submitting a written application to Hotel Cosmopolitan AD, containing: name, personal identification number, address and other identification data of the respective individual; description of the request; Preferred form for providing the signature information, date, address for correspondence and telephone.

13.5 The application is free of charge.

13.6 Upon submission of an application by an authorized person, the application shall also be accompanied by an explicit notarized power of attorney.

13.7 In the event of the death of the individual, his rights shall be exercised by his / her heirs by applying to the application also a certificate of heirs

14. The application is also considered and Hotel Cosmopolitan AD is responded within one month from the receipt of the request. If necessary, this period may be extended by a further two months. The company shall inform the data subject about any such extension within 1 month of receipt of the request, indicating the reasons for the delay.

15. Hotel Cosmopolitan AD provides a response to the applicant, taking into account the form of information provided by the applicant.

16. Where the data does not exist or the provision is prohibited by law, the applicant shall be denied access to it.

17. In the event that the applicant is not satisfied with the response received and / or considers that his / her rights relating to the protection of personal data have been violated, the applicant shall be entitled to exercise his or her right of defense.

18. Contact details with administrator:

Administrator: Hotel Cosmopolitan AD,

UIC: 201344433

Address: Ruse, Dobri Nemirov 1 Str

E-mail: reception@cosmopolitanhotelbg.com

Phone: 082805050

Website: www.cosmopolitanhotelbg.com

Data Protection Officer: Hristina Mitkova Dakova

E-mail: h.dakova@cosmopolitanhotelbg.com

Telephone: +359884200887

19. Contact details with supervisor:

Supervisory Authority: Personal Data Protection Commission

Address: Sofia 1592, "Prof. Tsvetan Lazarov" 2 str.

Phone: 02 / 91-53-518

E-mail: kzld@cpdp.bg

Website: www.cdpd.bg

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