



VIGOR

CITY HOTEL



PRIVACY POLICY

PRIVACY POLICY OF VIGOR HOTEL, HASKOVO, BULGARIA

The management and team of "Vigor Hotel" strive to offer exceptional products, services and experiences. We highly value our business, but above all, we value your loyalty. We know that privacy is important to you and we have made this statement to clarify our practices regarding the personal data we collect from or for you on this site through oral or written communication with us when visiting the Vigor Hotel or through other sources, such as tourist operators for example.

This Statement describes the practices adopted at Vigor Hotel, in full compliance with the requirements of EU Data Protection Regulation (EU) 679/2016.

What personal data do we collect?

At each event with the participation of our guests or in the preparation of such a meeting, it may be necessary to collect personal data such as names, telephone numbers, e-mails, addresses, etc., and they are always collected only for the specific purpose and possible the smallest set of such data needed to achieve the goal.

Marketing research on the opinions of our guests and customers about the quality of the products and services we offer is part of the list of such events designed to offer only the most suitable for your products and services.

Personal data collected when guest registration is legally required and regulated. Upon registration at the hotel you are given the opportunity to see the information provided by receptionists about the protection of personal data.

Other information gathered in the hotel

- Collection of information at the premises of Vigor Hotel

The Tourism Act obliges us to collect the minimum personal data required by this Act upon registration of guests at the hotel. In order to ensure your security, it is possible to make videos of guests and visitors in public areas of the complex.

- Organization of events.

Technical details of events organized by you may include data such as date and time, number of guests, information about guest rooms and the minimum personal data required for them. For corporate events, data about the business and additional information may be required.

When you visit us as part of a group, we will have the personal data provided by the group so that you can receive suggestions from us to visit the events organized by the group, depending on your personal preference. If you are an event organizer, you may agree to share your event data with third-party service providers to provide your event services.

- Social media.

If you are a social networking user, we encourage you to share with your contacts information about your stay with us with text and or photo material as well as photos, for example, with photos taken during your stay with us. If other people are present in the photo, their consent is necessary in this case.

Personal data received from third parties

It is common practice for third parties to be in your relationship with us, such as the tour operator through which you have booked and paid your stay and additional services or event organizers. They have contracts with us for the processing of personal data as joint administrators or as an administrator and processor of personal data, so that your personal data protection is also in accordance with Regulation (EU) 679/2016 as a legal commitment of both parties to you.

Sharing personal data

Striving to offer the best experience and the best quality products and services Vigor Hotel, may need to share information with overlapping objectives or with your consent, with service and our trading partners, which we have in all cases under the Data Protection Regulation (EU) 679/2016. For example, when planning a group event or meeting, information is collected that can be shared with the organizers and or our trading partners whose products or services would improve your experience in our complex.

Sharing information in all other cases is only legally regulated by the relevant officials, such as the requirements of the Tourism Act.

Vigor Hotel does not provide personal data outside the country.

Protection of personal data

- **definitions**

Under Article 4 of Regulation 679/2016:

(1) "personal data" means any information relating to an identifiable natural person or a natural person ("data subject"); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by an identifier such as name, identification number, location data, online identifier or one or more signs specific to the physical, physiological, genetic, mental, mental, economic, cultural or social identity of that individual;

2) "processing" means any operation or set of operations performed with personal data or a set of personal data by automatic or other means such as collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, consulting, using, disclosing through transmission, dissemination or other means by which data becomes available, arranged or combined, limited, deleted or destroyed;

(3) "Limitation of processing" means the marking of personal data stored in order to limit its processing in the future;

(4) "profiling" means any form of automated processing of personal data involving the use of personal data for the assessment of certain personal data, in particular for the analysis or forecasting of aspects relating to the implementation of the professional duties of that individual, his or her economic status, health, personal preferences, interests, reliability, behavior, location or movement;

(5) "aliasing" means the processing of personal data in such a way that personal data can no longer be linked to a particular data subject without the use of additional information, provided that it is kept separately and is subject to technical and organizational measures to ensure that personal data are not linked to an identifiable natural person or an identifiable individual;

(6) "Personal data record" means any structured set of personal data accessed in accordance with certain criteria, whether centralized, decentralized or distributed according to a functional or geographic basis;

(7) "controller" means a natural or legal person, a public authority, an agency or other entity which, alone or jointly with others, defines the purposes and means of processing personal data; where the

purposes and means of such processing are determined by Union or national law, the controller or the specific criteria for determining such treatment may be laid down in Union law or in the law of a Member State;

(8) "Personal data processor" means a natural or legal person, a public authority, an agency or other entity which processes personal data on behalf of the controller;

9) "Recipient" means a natural or legal person, a public authority, an agency or other entity to which personal data is disclosed, whether or not a third party. At the same time, public authorities which may receive personal data in a specific investigation under Union law or the law of a Member State are not considered as 'recipients'; the processing of such data by the said public authorities complies with the applicable data protection rules according to the purposes of the processing;

(10) "third party" means a natural or legal person, a public authority, an agency or other body other than the data subject, the controller, the data processor and the persons directly managing the controller or the personal data processor data;

(11) 'data subject's consent' means any free expression, specific, informed and unambiguous indication of the will of the data subject by means of a statement or a clear confirmatory act expressing the consent of the data subject to be processed;

(12) "Personal data breach" means a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data that is transmitted, stored or otherwise processed;

(13) 'genetic data' means personal data relating to the inherited or acquired genetic traits of a natural person giving unique information on the traits or health of that individual and deriving, in particular, from a biological sample the individual in question;

(14) 'biometric data' means personal data obtained as a result of a specific technical processing that are related to the physical, physiological or behavioral characteristics of an individual and which allow or confirm the unique identification of that individual, such as facial images or dactyloscopic data ;

(15) "Health status" means personal data relating to the physical or mental health of an individual, including the provision of health services that provide information on his / her state of health;

- principles

Under Article 5 of Regulation 679/2016, the principles are met when:

Paragraph 1.

Personal data are:

- (a) Processed lawfully, in good faith and in a transparent manner with regard to the data subject („**lawfulness, good faith and transparency**");
- (b) collected for specific, explicit and legitimate purposes and not further processed in a way incompatible with those purposes; further processing for archiving purposes in the public interest, for scientific or historical research or for statistical purposes is not considered to be incompatible with the original objectives ("**limitation of objectives**") under Article 89 (1);
- (c) Relevant, related and limited to what is necessary in relation to the purposes for which they are being processed („**minimization of data**");
- (d) accurate and, if necessary, up-to-date; all reasonable measures must be taken to ensure the timely erasure or correction of inaccurate personal data, taking into account the purposes for which they are processed ("**accuracy**");
- (e) stored in a form which permits the data subject to be identified for a period no longer than is necessary for the purposes for which the personal data are processed; personal data may be retained for longer periods as far as they are processed solely for the purpose of public interest archiving, scientific or historical research or statistical purposes pursuant to Article 89 (1), provided appropriate technical and organizational measures provided for in this Regulation in order to guarantee the rights and freedoms of the data subject (the "containment limit");
- (f) Processed 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 damage, by applying appropriate technical or organizational measures („**integrity and confidentiality**").

Paragraph 2.

The administrator is responsible and able to demonstrate compliance with paragraph 1 („**accountability**").

- rights of the subjects

1. Data subjects shall have the following rights in respect of the processing of data and the data recorded for them:

- Requesting confirmation that personal data associated with it is being processed and, if so, accessing the data, as well as information on whom the recipients of that data are.
- Request a copy of their personal data from the ADMINISTRATOR;
- To ask the ADMINISTRATOR to correct personal data when they are inaccurate and when they are no longer up to date;
- To require the ADMINISTRATOR to delete personal data collected on the basis of consent (right to be forgotten);

- To ask the ADMINISTRATOR limiting the processing of personal data when fundamental full and motivated, in which case the data will only be stored but not processed;
- Make a reasoned objection to the processing of his or her personal data;
- Send a complaint to the Supervisory Authority (Personal Data Protection Commission) if it believes that any of the provisions of Regulation (EU) 679/2016 has been compromised;
- Requesting and providing personal data in a structured, widely used and machine readable format when the format and formats are regulated in our internal regulatory framework;
- When processing personal data on the basis of an agreement, withdraw its consent to the processing of personal data at any time by a separate request addressed to the controller;
- Not to be the subject of automated decisions affecting him to a significant extent without the possibility of human intervention;
- To oppose automated profiling, if so happens without his consent.

2. THE ADMINISTRATOR provides conditions to ensure that these rights are exercised by the data subject:

Data subjects may make requests for access to data and the ADMINISTRATOR ensures that the response of the data subject's request meets the requirements of Regulation (EU) 679/2016.

Data subjects have the right to file complaints to the ADMINISTRATOR concerning the processing of their personal data.

- Responsibility

Under Article 24 of Regulation (EU) 679/2016

Responsibility of the administrator Vigor Hotel

Paragraph 1.

Taking into account the nature, scope, context and purposes of the processing as well as the risks of different probabilities and burdens on the rights and freedoms of natural persons, the controller shall put in place appropriate technical and organizational measures to guarantee and be able to demonstrate that the processing shall be carried out in accordance with this Regulation. These measures shall be reviewed and, if necessary, updated.

Paragraph 2.

Where this is proportionate to the processing activities, the measures referred to in paragraph 1 shall include the application by the controller of appropriate data protection policies.

Paragraph 3.

Adherence to approved codes of conduct or approved certification mechanisms may be used as evidence to demonstrate compliance with the controller's obligations.

This paragraph will be applied by Vigor Hotel as soon as sectorial policies and or certification in the Hospitality and Catering Industry are established!

- joint processing

In order to ensure the maximum security and comfort of our guests, when working with tour operators and or other partners with regard to the service and provision of information and or

services, Vigor Hotel always concludes contracts / agreements for processing of personal data under Regulation 679/2016

- contact details

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