



DATA POLICY

Hotel Triada takes the protection of your personal data very seriously and we have adopted the common principles of protection in this respect. With regard to the entry into force of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“GDPR”), this Privacy Notice provides you with detailed information regarding the protection of your personal data by Hotel Triada.

The purpose of this Privacy Notice is to inform you of what personal data we collect about you, the reasons why we use and share such data, how long we store them and how you can exercise your rights. The company SS 2001 AD, UIC: 130565580, having its seat and registered office at: Sofia, Slatina Region, 5 Venera Street, represented by the Managing Director Stoyan Asenov Ivanov, shall act as a data controller with regard to such processing.

1. PROCESSED PERSONAL DATA

We collect and process your personal data to the extent necessary for our activities and to achieve a high standard for our services. We may collect various types of personal data about you as a guest in our hotel, including:

- identifying information (e.g. name, PIN, ID card and passport number, nationality, place and date of birth (for foreign customers), photo, IP address when using our website);
- contact information (e.g. postal address and e-mail address, phone number);
- bank details (e.g., data about a bank account for online payments);
- data relating to your use of our website;
- CCTV data from the hotel's premises;

We shall never collect personal data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex life or sexual orientation or data relating to criminal convictions, unless we have a legal obligation to do so.

The data that we process about you shall be provided directly by you in respect to our services.

2. GROUNDS FOR PROCESSING

a. For compliance with legal and regulatory obligations

We shall process your personal data to comply with particular legal and regulatory obligations – such as the National Revenue Agency, the Ministry of Interior, the municipal offices. We may provide information on a formal request from a duly



authorised public or judicial authority. The data required by law are those without which it is impossible to provide the hotel services.

- b. For the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract

We shall use your personal data for the conclusion and performance of our contracts with you, as well as:

- to provide you with information about our services;
- to assist you and to respond to your requests;
- to evaluate whether we can provide you with a service and under what conditions;

- c. For the purposes of our legitimate interests

We shall use your personal data to deploy and develop our services through advertising, to ensure your safety while using our services, as well as to exercise and protect our legitimate rights and interests;

- d. Your consent

In case we perform further processing for purposes other than those listed above, we shall inform you of this and, where necessary, shall obtain your consent.

3. RECIPIENTS

For the purpose of achieving the above purposes, we shall disclose your personal data only to:

- Certain service providers, which provide services on our behalf – accounting firms, couriers, IT companies maintaining our servers;
- Judicial authorities, supervisory administrative authorities, government agencies and other public authorities and organisations, at request and to the extent permitted by law;
- Certain specialists from regulated areas of activity – such as auditors or lawyers, in cases where we need to exercise and/or protect our legitimate rights and interests;

4. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

The company shall not transfer personal data outside the European Union and the European Economic Area.

In cases of transfers of data to another Member State of the European Union or the European Economic Area, all requirements for the protection of these data and for the implementation of contractual protection clauses with the receiving State shall be respected.



Transfers of data outside the European Economic Area may take place only when the European Commission has recognised that a given non-EEA country provides an adequate level of data protection or by implementing standard contractual clauses adopted by the European Commission in order to ensure the protection of the personal data.

5. STORAGE PERIODS

We shall process and store your personal data for a certain period of time determined by:

- the periods required for compliance with the Bulgarian and European legislation;
- another period with respect to our operational requirements, with a view to protecting our legitimate rights and interests:
 - a. The personal data under the contracts with our customers shall be stored for a period of 5 years after the end of the contractual relationship or for another period specified by the law. In the event of a legal dispute or proceedings requiring the retention of data and/or at the request of a competent public authority, the data may be retained for a longer period than specified until the final resolution of the dispute or proceedings before all instances.
 - b. The accounting documentation shall be stored by our accounting firm for a period of 10 years in compliance with the statutory requirements.

6. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM

Under the personal data protection legislation, you have certain rights with respect to your personal data, as follows:

- Right of access: you may obtain information relating to the processing of your personal data and a copy of such personal data.
- Right to rectification: when you believe that your personal data are inaccurate or incomplete, you may request such personal data to be amended accordingly.
- Right to erasure: you may request the erasure of your personal data to the extent permitted by law unless the company demonstrates that there are legitimate grounds for the processing which override the interests of the data subjects, or where necessary for the establishment, exercise or defence of the legal claims of the company.
- Right to restriction of processing: you may request the restriction of the processing of your personal data to the extent permitted by law.
- Right to object: you may object to the processing of your personal data on grounds relating to your particular situation. You have the absolute right to object to the processing of your personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing.
- Right to withdraw your consent: if you have consented to the processing of your personal data, you have the right to withdraw that consent at any time.



- Right to data portability: where applicable, you have the right to receive your personal data that you have provided to us or, where technically feasible, to have the personal data transmitted to a third party.

In compliance with the applicable requirements, in addition to your rights above you may also notify personal data breached to the Personal Data Protection Commission at: Sofia 1592, 2 Professor Tsvetan Lazarov Boulevard, 02/91-53-518 or to the respective competent court.

7. MISCELLANEOUS

You can find more information about our privacy and security policies in our Cookies Policy.

8. CONTACTS

In case of questions related to the use of your personal data under this Privacy Notice, please call: +359 887 592 692 or contact us at: nina.raycheva@cteam.bg