



DATA PROTECTION FINAL

General Information

Park Hill Residences takes the issue of safeguarding your privacy very seriously. We have created this Privacy Policy in order to better familiarize you with the information we collect from the guests to the Park Hill Residences and our website.

In Particular you will find below information about the processing of your personal data and the data protection rights you are afforded. The content and scope of the data processing are largely based on each of the services that you have requested or that have been agreed with you.

Generally, it is necessary to obtain your consent before we can hold and use such information. However, we may hold and use such information without consent for limited statutory purposes such as monitoring compliance if necessary for legal claims, or in the public interest.

Personal Information

The term Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). It can include, among other things, your name, address, age, gender and personal financial history related to the bookings in Park Hill.

What is the purpose of collecting personal information?

Personal Information is collected to allow us to make your reservation and provide the services you request, to ensure we meet your needs while you are staying with us and/or to allow us to contact you in relation to matters that may arise from your stay with us, as well as have the ability to confirm prior transactions and reconcile statements or invoices.

Finally, we may use the Personal Information you provide us to send you surveys strictly related to your stay with us and our services for customer satisfaction purposes and improving our services offered to our clients. Occasionally we will combine information from a number of Guests to better understand trends and Guest expectations. When this occurs, all identifiers are removed, and the aggregate information cannot be linked to any specific Guest.

How we collect Personal Information

Park Hill strives to ensure that the Information on the web site is reliable and accurate. You accept that errors

Cookies

When you visit our web site, you are initially given a "cookie", and your computer is assigned an ID number. A cookie is a commonly used piece of software that tracks an individual user's preferences, and is capable of enhancing your visit to the site. Cookies allow us to provide a customized experience without the visitor having to remind us of his or her preferences each time she or he visits our site. Our cookies do not contain any personally identifying information. By not blocking the use of cookies, you will be deemed to have consented to the use of such a cookie by Park Hill Residences d.o.o.

We also use cookies to collect and maintain aggregate web site data (such as the number of visitors to a particular site), which helps us see which areas are popular with our users and which are not. Among other

things, this helps us improve and update the site, based on such data as total number of visitors and pages viewed.

If you do not want to accept cookies, you can block them by adjusting the settings on your Internet browser. Visitors should understand, however, that rejecting cookies will affect your ability to benefit from the conveniences afforded by the use of cookies. Please note that because this is a setting on your browser, this adjustment may also block cookies for any website you visit.

When Making a Reservation

On Our Web Site

You can search for rates and availability in our Residence without providing any Personal Information.

Visitors to our websites who choose to make reservations online will be required to complete standard procedure for the first time they make a reservation. When you create a reservation profile you will be asked to provide specific Personal Information, including your name, address and contact information, as well as certain guarantee and deposit information to secure your reservation, such as your credit card number.

Your transmittal of your Personal Information shall constitute your acknowledgment and agreement to the terms and conditions contained in this Privacy Policy. We also retain a copy of the reservation profile on our web site, excluding your credit card number.

Through our Reservations Department

Reservations can also be made by calling our Reservation Team. When you make a reservation we may ask you for Personal Information such as your name, address, telephone number and method of payment. We may also obtain from you any room preferences or special requests. Confirmation of your reservation will be provided directly to you, generally by e-mail.

During your stay

Information particular to your stay may also be stored (i.e. health issues, payment difficulties, special requests, service issues). This specific information is stored in the property management system and is combined with information from previous visits that you have made.

In addition, we may retain the content of any document (including letters, comment cards, electronic documents such as e-mails and other similar forms of communication) that you send us before, during or following your stay. This information may be shared with our employees.

Any data collection that is optional would be made clear at the point of collection.

Storage of personal information

Park Hill Residences d.o.o. undertakes necessary measures to ensure that all Personal Information is kept in a secure location, be it a database or filing cabinet. Furthermore, we take steps to ensure that only designated individuals have access to this information.

The stored information includes guest name, address and phone numbers. We may also store certain information regarding your service preferences.

Information that is not secure

It is important to note that any e-mail communication is not secure. This is a risk inherent in the use of e-mail. Please be aware of this when requesting information or sending forms to us by e-mail (for example, from the Contact Us section of our web site). We recommend that you do not include any confidential information (i.e. credit card information) when using e-mail. For your protection, our e-mail responses to you will not include any confidential information.

Provision of Personal Information to third parties

Agents, contractors or third party service providers of Park Hill Residences may receive your Personal Information in the course of providing services to Park Hill Residences d.o.o.

Using contractual or other arrangements, Park Hill Residences ensures these parties protect your Personal Information in a manner consistent with the principles articulated in this Privacy Policy. Where the party to whom we share your personal information is a legal entity, we hereby affirm that we will take all reasonable steps and/or actions to confirm that the employees and/or representatives of such a third party will execute their duties in accordance with the highest industry standards and will comply with all provisions and requirements of the provisions of this Privacy Policy and the local laws and regulations on the protection of personal data (as amended from time to time) and GDPR and any legislation to success it or complement it.

We may disclose your personal data to third parties in order to comply with any legal obligation or in order to enforce or apply our terms and conditions and other agreements and/or based on your consent/instructions. We process the aforementioned personal data in compliance with the provisions of GDPR and the applicable local legislation as amended from time to time.

- For compliance with a legal obligation
- For the performance of contractual obligations
- For the purposes of safeguarding legitimate interests - where necessary, we process your data above and beyond the actual performance of our obligations as a Residence in order to safeguard the legitimate interests pursued by us or by a third party.
- On the basis of your consent – In so far as you have granted us consent to the processing of personal data for marketing purposes, the lawfulness of such processing is based on your consent. Any such consent granted, may be revoked at any time by contacting us.

Access and Update of Personal Information

We understand that you may like to know what Personal Information we hold about you. We are happy to assist you with your request. To protect your Personal Information, however, we require that you prove your identity to us at the time your request is made. You may make a request at the property where you stayed as set out below.

If at any time you wish to update or access your Personal Information, you can do so by contacting the reservation department.

How long is personal information stored?

We will keep your personal information for as long as you are person enjoying our services and after you stop being a guest, we may keep your personal information for a period of up to 11 years.

Please note that we will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Your Data Protection Rights

The following are the rights you have pursuant to the provisions of the GDPR and the applicable local legislation (as amended from time to time) in relation to the data protection:-

- Request access to your personal data (commonly known as a “data subject access request”).
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please note however that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. In such a case, your data will be stored but not processed until expiration of the retention obligation.
- Subject to the legal basis on which the processing activity is based, you may object to processing of your personal data. Please note that in some cases, we may have compelling legitimate grounds to process your information which we need to comply with.
- Request restriction of processing of your personal data (a) if it is not accurate;(b) where processing may be unlawful but you do not want us to erase your data; (c) where you need us to hold the data even if we no longer require it; or (d) where you may have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party.
- In case the processing of the data is performed subject to your consent, you may withdraw consent at any time where we are relying on consent to process your personal data. However, we note that this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will of course advise you if this is the case at the time you withdraw your consent.

Please note that we may charge you with an administrative fee, in cases where requests are deemed manifestly unfounded or excessive, in particular because of their repetitive character.

If you choose not to give your personal information

If you choose not to give us your Personal Information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform activities needed to efficiently provide you with our services or withdraw your booking.

If you have any questions, or want more details about how we use your personal information, you may contact us at the above contact details and we will be happy to provide you with further details:

- via e-mail at info@parkhill.club
- via letter

Attention: Data Protection Officer

Park Hill Residences d.o.o.

Slobode Ul. 87

52221 Rabac

Croatia

Changes to our Privacy Policy

Our Privacy Policy may change from time to time and we will post the revised policy on our web site, so you are always aware of how we treat Personal Information. Without your express consent we will not reduce your rights under this Privacy Policy with respect to Personal Information already collected about you.

Data Security

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Applicable Laws

Croatian law applies to Park Hill Residences d.o.o.

