

# PRIVACY POLICY

## 1. Introductory provisions

This privacy policy is applied to all Kaštel Hotel facilities in Motovun operating within GIP d.o.o. with its head office in Karojbai, Pilati 86/b, OIB: 50726838773

The purpose of this privacy policy is to explain how personal data, which is collected from you or about you on [www.hotel-kastel-motovun.hr](http://www.hotel-kastel-motovun.hr), from written or verbal communication with you, and during your visit to our restaurant or the hotel, is processed.

As each our guest is very important to us, it is our highest priority to offer supreme service.

GIP d.o.o. and Hotel Kaštel Motovun respect your privacy and take all measures to keep your personal data protected.

All visitors of our web page and all our guests in general, including you, deserve our maximum discretion and responsibility in the management of their personal data. The collection and storage of information is carried out in line with the **General Data Protection Regulation (GDPR)**.

"Personal data" means all information collected and stored in the form which facilitates your personal identification, either directly (e.g. by name) or indirectly (e.g. by phone number) as a natural person. Before submitting said data, it is our recommendation that you read this document which describes our client's privacy protection guidelines.

### Personal data we collect

Each interaction or a contact with a guest during any form of our operation is an opportunity for collecting personal data. You may provide your personal data to us in the following ways:

- requesting information on making a reservation for service, stay or visit to our restaurant or the hotel;
- sending a query by e-mail;
- paying in our restaurant or the hotel;
- in the process of making a reservation, filling out a survey, and participating in a prize game or a promotion;
- in communicating with us by phone, e-mail, social networks, fax, or other means;
- by filling out questionnaires after your stay, by providing feedback or a review in relation to your stay or the use of our services and products;
- event organization on our premises - we collect details regarding meetings and events, event dates, number of guests, and in case of business meetings and events, we collect data on your organization

Personal data can be collected by means of a close circuit surveillance camera network and other security measures in our facilities, which may take photos or footages of our guests and visitors, and which we use for the protection of our staff, guests and asset.

As we have established a close cooperation with third parties (including e.g. travel agents and providers of accommodation services, business partners, technical, payment and delivery services contractors,

advertising networks, analytical services providers, search information providers, we may also obtain your personal data from them.

If you access and use our website (including: browsing, transfer, cache storage or storing of this web page or any other service, function, material or content located thereon), it will imply you have read and accepted all terms of use.

## **2. Data covered by the privacy policy system**

Data primarily requested from you, and which we keep protected is:

- name and surname
- address
- contact data: e-mail address, phone/mobile number
- your credit card data provided to the hotel during online reservation or any other payment procedure or the reservation payment insurance
- other data you may mention and which you wish to keep confidential.

Please bear in mind that in certain cases we may collect or have at our disposal sensitive personal data such as your nationality (from the passport or the ID), membership in a political, professional or commercial association (information linked with group reservation or an event with which you have been connected during your stay in the hotel, medical and/or health-related information (connected with your preferences, special requirements or demands).

By providing your contact data (such as e-mail, phone, etc.) to Kaštel Motovun Hotel i.e. GIP d.o.o. as the hotel owner, you simultaneously provide your explicit consent for being contacted by Kaštel Hotel Motovun for the purpose of offering its products and services and at the same time acknowledge that you have been acquainted with the content hereof. If a guest does not desire the above, said guest shall inform Kaštel Hotel Motovun thereof in writing (by registered mail or e-mail).

We may share your personal data as much as it is necessary to be in line with our legal obligations as well as laws and regulations pertaining to you. We may share your personal information with the other parties with your consent or without your consent if it is necessary for us to fulfil our obligations towards you.

You may at any time cancel the protection of this data by making an explicit statement. You may also at any time unsubscribe from our mailing list, by which we will cease to use your data for promotion. If that is the case, we may use your data only for our own internal purposes e.g. for the purpose of statistical data processing. Data will be stored in the system for the next 5 years or until your recall.

We will take all reasonable steps to ensure the accuracy and the completeness of any of your personal data stored in our records..

## **3. Purpose of obtained data**

All information which we request shall be used solely for the following purposes:

- provision of services requested from us (organization of events, seminars, celebrations, etc.)
- fulfilling the obligation stemming from various agreements between you and us such as making reservations and booking (contractual obligation)
- registration in the e-visitor system upon your arrival to the hotel (legal obligation)
- a more efficient reply to your query,
- providing you with information prior to your arrival, reservation confirmation and e-invoices,
- improving your stay in the hotel,
- management of our loyalty programme,
- providing conference and event-related information,
- using your feedback for improving our services,
- our internal statistical data processing.

We responsibly guarantee that said data will be used solely for the purposes specified above. By providing your personal data through all forms of communication, you give your explicit consent to be contacted by GIP d.o.o. and Kaštel Motovun Hotel for the above purposes. If you do not wish to be contacted by us, you must inform us thereof in writing.

As we do not collect personal data from the minors (persons under 18) on purpose, we would be grateful if your children would not submit any personal information without your permit.

In terms of our obligations towards local authorities, it is possible we might be obliged to submit your data to local authorities as stipulated under the law.

#### **4. Content of the privacy policy**

We do not sell, lease nor place at a disposal of third legal and natural persons your e-mail address and other data without your consent as it is contrary to our privacy policy. We shall request your special permission if you wish to be contacted about special offers.

GIP d.o.o. shall not be held responsible for any accidental error or an error due to force majeure or any other objective circumstances which might cause the accidental breach of the guaranteed protection of your data, but it shall guarantee that said error will be eliminated as soon as possible.

We collect only such personal data which has been submitted to us voluntarily and we use them solely for the provision of the above stated services. We do not demand that you should send said data so as to be provided with the access to our website and we do not require more information than truly necessary for the participation in an activity on our website. Your credit card data provided shall be used only for the insurance of the payment of reserved services and it has the same level of protection as your other personal data. Following a regularly provided and paid service, said data shall not be further used without your explicit consent.

By filling out the forms on our website, you guarantee that all your enclosed information is accurate and that you are in complete consent with the provisions of our Privacy Policy and the terms stated therein.

#### **5. Duration of privacy policy**

Once you have submitted your data, you have given your consent to us to contact you and thus join our mailing list. The moment of subscription is your explicit consent to contact. The protection of your data

privacy is permanent, and you may request to be unsubscribed from our mailing list at any moment, after which your data will no longer be used by Kaštel Motovun Hotel i.e. its owner GIP d.o.o. except for our internal purposes e.g. for IT or statistical data processing.

## **6. Statement regarding credit card information**

Under said statement you accept that we, as owners of this web page, are not responsible for any kind of credit card data interception or for any other illegal use of credit card data in connection with a direct use of this site. We are conducting all legally set data protection measures.

## **7. Cookies and online technologies**

As is the case with many other sites, our site may also use cookies and other technologies which facilitate a delivery of content as per your interests and processing of reservations or requests, and/or the analysis of your visit characteristics.

Cookies are a kind of data packages used by servers to send status information in the user browser and to return status information back into the original server via same browser. Under said pattern, information is adjusted to your needs and the method in which you usually use the internet. Cookies by themselves cannot be used for disclosing your personal identity.

If you wish to, at any time, delete or disable the cookies on your device, you may update the settings of your internet browser.

For more information on how we use the cookies, read our Cookies Statement on: <http://hotel-kastel-motovun.hr/en/cookies/>

## **8. Data sharing**

We have established a partnership with PHOBS d.o.o., a company with a head office at the address Vukovarska 17, 20000 Dubrovnik (hereinunder 'PHOBS') to provide you with a service of online reservation of accommodation. Although we are responsible for the content on this website and the reservation is carried out directly via our site, the very reservation process is carried out via the PHOBS reservation system. Data which you provide on that site will also be available to PHOBS. This may include personal data such as your name, contact data, payment data, names of guests who are travelling with you and any other data you might have stated during reservation.

## **9. Protection of personal information of children**

GIP d.o.o. and Hotel Kaštel Motovun advise parents and guardians to teach their children about a responsible and safe management of personal data online.

Our online sites which might appeal to children were made with the intention to protect the rights of children and their privacy in the highest possible measure. According to said intention and the intent, we:

DO NOT collect, DO NOT use, and DO NOT disclose data by means of which the online contact with children may be established.

We DO NOT submit to a third party any personal data of children without a prior permit by a parent or a legal guardian.

Apart from the above, we guarantee the protection of personal data of children foreseen under separate acts which regulate the issue.

## **10. Your consent**

By filling out the forms on this website, you guarantee that all your enclosed information is accurate, that you possess business capacity, that you are authorized to dispose with provided information, and that you fully agree that your data is used and collected in line with the law and the terms and conditions of our privacy policy.

## **11. Change of data**

You may contact us at any time for the purpose of reviewing, updating or deleting your personal data. Until then, we shall be using your old data for the abovestated purposes. In case of any difficulties with your rights, please contact us directly by e-mail to [info@hotel-kastel-motovun.hr](mailto:info@hotel-kastel-motovun.hr) or by phone: +385 52 681 607; or personally coming to the following address: Trg Andrea Antico 7, Motovun.

## **12. Transparency**

Amendments of our privacy policy shall come into effect having been published on this website. Said amendments shall be applied to our relations as if they had existed before your subscription to our mailing list provided they are pursuant to the relevant laws of the EU and Croatia and that they do not limit your rights.

Unfortunately, the transfer of information online is not fully secure. Although we will try to protect your personal data, we cannot guarantee the safety of your data sent to our website. Therefore, every data transfer is at your own risk. Following the receipt of your data, we shall use strict procedures and protection measures to prevent unauthorized access.

All personal data we collect from you is confidential in nature, except if you wish to publish them voluntarily. We do hereby declare that we shall not disclose to any other party data we have received from you, except in the cases stated herein.

Only authorized employees of GIP d.o.o. i.e. Kaštel Hotel in Motovun and reliable third parties which use of personal data is necessary for the execution of business interests, as it had been previously stated, will have access to personal data.

GIP d.o.o. and Kaštel Hotel in Motovun will not be held responsible for any errors in data protection, the result of force majeure which could not have been prevented by commercially reasonable means. We guarantee that said errors will be eliminated, immediately if possible.

### **13. Data confidentiality**

We would like to emphasize that your personal data shall remain confidential upon your visit to these web pages, except if you do not wish to disclose them voluntarily. We undertake not to disclose to other parties any data we have received, except in the cases set under the law.

### **14. Contact by e-mail**

When you send us an e-mail with personal data which identify you, either by an e-mail containing a question or a comment or a form you submit electronically, we shall use said data to meet your demands.

### **15. Data security**

For the purpose of ensuring the security of data on this web page and to ensure the availability of this service to all users, this computer system is using the software which monitors the visits and recognizes unauthorized attempts of data submission or exchange as well as those which might cause damage in any other way. Unauthorized attempts of data submission or exchange on this site are strictly prohibited.

### **16. Control**

You may at any time request the review of all personal data we have received from you by means of our web address. We may, at your request, update, correct or delete said data (if said data is still a part of our database) or stop using it in future. If you wish to exercise this right, just call us.

Hotel Kašel Motovun

GIP d.o.o.