

**ZÁMOK VIGLAŠ s.r.o., with its registered office at Kremnická 24, 851 01 Bratislava, Company ID: 35 967 641, registered in the Commercial Register of the District Court of Bratislava II, Section Sro, Insert No. 38543/B, operation: Grand Viglaš Hotel, Zámocká 602, 962 02 Viglaš**

As the operator, it provides this notification to the data subject regarding the processing of personal data in accordance with Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the “Regulation”) and Section 19 of Act No. 18/2018 Coll. on the Protection of Personal Data and the Amendment of Certain Laws of the Slovak Republic, under the title:

## **PERSONAL DATA PROTECTION PRINCIPLES**

### **Purpose of personal data processing in the Accounting and Tax Documents Register:**

In the course of its operations, personal data is processed when handling accounting documents and related administrative tasks.

**Scope of affected individuals:** natural persons – clients, employees

**List of personal data:** first name, last name, title, permanent address, temporary address, phone number, email address, date of birth, type and number of identification document, signature, bank account number of the natural person.

**Legal basis for personal data processing:** Act No. 431/2002 Coll. on Accounting as amended, Act No. 222/2004 Coll. on Value Added Tax as amended, Act No. 40/1964 Coll. Civil Code as amended, Act No. 152/1994 Coll. on the Social Fund and the Amendment of Act No. 286/1992 Coll. on Income Tax as amended, Act No. 311/2001 Coll. Labor Code as amended.

**Categories of recipients:** Social Insurance Agency, health insurance companies, tax authority, and entities authorized by specific regulations to decide on the rights and obligations of individuals: courts, bodies involved in criminal proceedings, and intermediaries: DAKRA Plus s.r.o.

**Transfer of personal data to third countries** does not occur.

**Data retention periods:** Accounting documents: 10 years

**Automated decision-making, including profiling, does not take place.**

Due to compliance with the principle of minimization, all personal data provided by you is a necessary legal requirement for fulfilling the purpose of its processing.

### **Purpose of personal data processing in the Incoming and Outgoing Mail Register and Records Management:**

**In the course of its activities, personal data is processed in the Incoming and Outgoing Mail Register and tasks related to records management.**

**Scope of affected individuals:** natural persons – addressees, employees

**List of personal data:** first name, last name, title, address, organization name, job position, email address, subject and content of the correspondence

**Legal basis for personal data processing:** Act No. 395/2002 Coll. on Archives and Records and the Amendment of Certain Laws as amended

**Categories of recipients:** Entities authorized by specific regulations to decide on the rights and obligations of individuals: courts, bodies involved in criminal proceedings

**Transfer of personal data to third countries** does not occur.

**Data retention periods:** Regular correspondence: 3 years

**Automated decision-making, including profiling, does not take place.**

Due to compliance with the principle of minimization, all personal data provided by you is a necessary legal requirement for fulfilling the purpose of its processing.

### **Purpose of personal data processing in the Contract Register:**

In the course of its activities, personal data is processed that is necessary for the performance of a contract to which the data subject is a party, or to take steps prior to entering into a contract at the request of the data subject.

**Scope of affected individuals:** natural persons – contracting party

**List of personal data:** first name, last name, title, permanent/temporary address, account number of the natural person, bank name, ID card number, data related to the subject of the contract

**Legal basis for personal data processing:** Section 13(1)(b) of Act No. 18/2018 Coll. on the Protection of Personal Data and the Amendment of Certain Laws

**Categories of recipients:** Entities authorized by specific regulations to decide on the rights and obligations of individuals: courts, bodies involved in criminal proceedings

**Transfer of personal data to third countries** does not occur.

**Data retention periods:** Contracts: 10 years

**Automated decision-making, including profiling, does not take place.**

Due to compliance with the principle of minimization, all personal data provided by you is a necessary contractual requirement for fulfilling the purpose of its processing.

### **Purpose of personal data processing – Hotel Guests:**

In the course of its activities, personal data is processed for the registration of hotel services, hotel guests, room reservations, registration of personal data in the hotel system within the guest bank, and registration of foreign guests.

**Scope of affected individuals:** accommodated guests

**List of personal data:** first name, last name, title, date and place of birth, nationality, permanent residence in the home country, purpose of the trip to the Slovak Republic, passport number, visa: type, number, validity, name and address of the accommodation facility in the Slovak Republic, accompanying children, length of stay in Slovakia.

**Legal basis for personal data processing:** Act No. 40/1964 Coll. Civil Code, Act No. 455/1991 Coll. on Trade Licensing, Act No. 595/2003 Coll. on Income Tax, Act No. 582/2004 Coll. on Local Taxes and Local Fees for Municipal Waste and Small Construction Waste as amended, Act No. 222/2004 Coll. on Value Added Tax, Act No. 404/2011 Coll. on the Residence of Foreigners and Amendments to Certain Laws, Act No. 431/2002 Coll. on Accounting, Act No. 496/2008 Coll. on Reporting the Residence of Slovak Citizens and the Register of Inhabitants of the Slovak Republic as amended.

**Categories of recipients:** Entities authorized by specific regulations to decide on the rights and obligations of individuals: courts, bodies involved in criminal proceedings.

**Transfer of personal data to third countries** does not occur.

**Data retention periods:** Guest registry: 10 years

**Automated decision-making, including profiling, does not take place.**

Due to compliance with the principle of minimization, all personal data provided by you is a necessary legal requirement for fulfilling the purpose of its processing.

### **Purpose of personal data processing in the Complaints Register:**

In the course of its activities, personal data is processed for registering individuals who wish to file a complaint.

**Scope of affected individuals:** natural persons – clients

**List of personal data:** first name, last name, title, residence, phone number, email address, and the nature of the complaint.

**Legal basis for personal data processing:** Act No. 40/1964 Coll. Civil Code as amended, Act No. 108/2024 Coll. on Consumer Protection and Amendments to Certain Laws, and other related binding legal regulations.

**Categories of Recipients:** SOI – Act No. 128/2002 Coll. on State Market Surveillance in Consumer Protection Matters and on Amendments and Supplements to Certain Acts, and entities to which a special regulation grants the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities.

**Transfer of Personal Data to Third Countries:**

Personal data is not transferred to third countries.

**Personal Data Retention Periods:** Complaints: 10 years

**Automated Decision-Making Including Profiling:** Automated decision-making, including profiling, does not take place.

In accordance with the principle of data minimization, all personal data you provide is a necessary legal requirement for fulfilling the purpose of its processing.

**Purpose of Personal Data Processing – Reservation System:** Personal data is processed as part of the reservation system and related service booking records.

**Categories of Data Subjects:** Natural persons – customers/clients

**List of Personal Data:** Title, first name, surname, phone number, email, date and time of reservation

**Legal Basis for Personal Data Processing:** Consent of the data subject

**Categories of Recipients:** Entities to which a special regulation grants the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities

**Transfer of Personal Data to Third Countries:** Personal data is not transferred to third countries.

**Personal Data Retention Periods:** Contract: 10 years

**Automated Decision-Making Including Profiling:** Automated decision-making, including profiling, does not take place.

The data subject has the right to withdraw their consent to the processing of personal data at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal; the data subject must be informed of this before giving consent. Consent may be withdrawn in the same manner in which it was given.

**Purpose of Personal Data Processing – Loyalty Program:**

Personal data is processed for the purpose of providing discounts, bonuses, and loyalty program benefits.

**Categories of Data Subjects:** Natural persons – customers/clients

**List of Personal Data:** Title, first name, surname, card number

**Legal Basis for Personal Data Processing:** Consent of the data subject

**Categories of Recipients:** Entities to which a special regulation grants the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities.

**Transfer of Personal Data to Third Countries:** Personal data is not transferred to third countries.

**Personal Data Retention Periods:** Personal data: for the duration of the processing purpose

**Automated Decision-Making Including Profiling:** Automated decision-making, including profiling, does not take place.

The data subject has the right to withdraw their consent to the processing of personal data at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal; the data subject must be informed of this prior to giving consent. Consent may be withdrawn in the same manner in which it was given.

#### **Purpose of Personal Data Processing – Consumer Competition:**

Personal data is processed for the purpose of organizing consumer competitions.

**Categories of Data Subjects:** Natural persons – customers / clients

**List of Personal Data:** First name, surname, address, date of birth, ID card number, email, phone number, and prize

**Legal Basis for Processing:** Consent of the data subject

**Categories of Recipients:** Entities to which a special regulation grants the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities

**Transfer of Personal Data to Third Countries:** Personal data is not transferred to third countries.

**Retention Periods:** (Not specified in the original; can be added if needed)

**Automated Decision-Making Including Profiling:** Automated decision-making, including profiling, does not take place.

The data subject has the right to withdraw their consent to the processing of personal data at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal; the data subject must be informed of this prior to giving consent. Consent may be withdrawn in the same manner in which it was given.

#### **Purpose of Personal Data Processing – Photographs:**

Photographs are published on the controller's website and social media for presentation purposes.

**Categories of Data Subjects:** Employees, accommodated guests, and event participants

**List of Personal Data:** Photograph

**Legal Basis for Processing:** Consent of the data subject

**Categories of Recipients:** Entities to which a special regulation grants the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities

**Transfer of Personal Data to Third Countries:** Personal data is not transferred to third countries.

**Retention Periods:** Photographs: for the duration of consent

**Automated Decision-Making Including Profiling:** Automated decision-making, including profiling, does not take place.

The data subject has the right to withdraw their consent to the processing of personal data at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal; the data subject must be informed of this prior to giving consent. Consent may be withdrawn in the same manner in which it was given.

### **Purpose of Personal Data Processing – Marketing:**

Personal data is processed for the purpose of maintaining member records and sending marketing offers, newsletters, and information about products and updates.

**Categories of Data Subjects:** Natural persons

**List of Personal Data:** Email

**Legal Basis for Data Processing:** Consent of the data subject

**Transfer of Personal Data to Third Countries:** Personal data is not transferred to third countries.

**Data Retention Periods:** Marketing: 13 months

**Automated Decision-Making Including Profiling:** Automated decision-making, including profiling, does not take place.

The data subject has the right to withdraw their consent to the processing of personal data at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal; the data subject must be informed of this prior to giving consent. Consent may be withdrawn in the same manner in which it was given.

### **Purpose of Personal Data Processing – Contact Form:**

Personal data is processed in the client database for the purpose of responding to submitted inquiries.

**Categories of Data Subjects:** Natural persons – clients

**List of Personal Data:** Title, first name and surname, phone number, email, message content

**Legal Basis for Data Processing:** Consent of the data subject

**Categories of Recipients:** Entities to which a special regulation grants the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities

**Transfer of Personal Data to Third Countries:** Personal data is not transferred to third countries.

**Data Retention Periods:** Contact form: a maximum of 6 months (in case of fulfilling legal obligations or legal claims of the controller under applicable legislation)

**Automated Decision-Making Including Profiling:** Automated decision-making, including profiling, does not take place.

The data subject has the right to withdraw their consent to the processing of personal data at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal; the data subject must be informed of this prior to giving consent. Consent may be withdrawn in the same manner in which it was given.

### **Purpose of Personal Data Processing – CCTV Surveillance System:**

Personal data is processed for the purposes of protecting public order and safety, detecting crime, and protecting health and property.

**Categories of Data Subjects:** Persons present in areas monitored by the CCTV system

**List of Personal Data:** Camera recordings

**Legal Basis for Data Processing:** Legitimate interest of the data controller

**Categories of Recipients:** Entities to which a special regulation grants the authority to decide on the rights and obligations of natural persons: courts, law enforcement authorities

**Transfer of Personal Data to Third Countries:** Personal data is not transferred to third countries.

**Data Retention Periods:** Audio/video recordings: 3 days

**Automated Decision-Making Including Profiling:** Automated decision-making, including profiling, does not take place.

The main legitimate interest is the protection of the controller's property, financial, and other interests, as well as the protection of the property, life, and health of the data subjects.

### **Rights of Data Subjects:**

Data subjects whose personal data is processed for specific purposes may exercise the following rights:

- Right to access their personal data
- Right to rectify personal data
- Right to erasure of personal data
- Right to restrict the processing of personal data
- Right to object to the processing of personal data
- Right to data portability
- Right to lodge a complaint with the supervisory authority – the Office for Personal Data Protection of the Slovak Republic

These rights are further specified in Articles 15 to 21 of the Regulation (GDPR). The data subject shall exercise these rights in accordance with the Regulation and other applicable legal regulations. Rights can be exercised towards the controller via a written request or by electronic means. If the data subject requests information to be provided orally, it may be done so only if the data subject proves their identity.

### **Data Security and Breach Notification:**

The company **ZÁMOK VÍGLAŠ s. r. o.** has implemented all appropriate personnel, organizational, and technical measures to ensure the highest level of protection for your personal data, aiming to minimize the risk of its misuse.

Pursuant to our obligation under Article 34 of the Regulation, we hereby notify you that, should a personal data breach occur which is likely to result in a high risk to your rights and freedoms, we will inform you of this fact without undue delay.

### **Changes to the Privacy Policy:**

Legislation and related data processing methods may change. If we decide to update these principles, we will post the changes on our website and notify you of such updates. In cases of significant changes or where required by law, we will inform you in advance.


We kindly ask you to read this policy carefully and regularly check it when communicating with us or using our website.


If you have any questions regarding the processing of your personal data or wish to exercise any of the above rights, you may contact us at: **[repcia@grandviglas.com](mailto:repcia@grandviglas.com)**

If you are not satisfied with our response or believe that your personal data is being processed unfairly or unlawfully, you can file a complaint with the supervisory authority:

## Office for Personal Data Protection of the Slovak Republic

 <https://dataprotection.gov.sk>

 Hraničná 12, 820 07 Bratislava 27

 Tel: +421 /2/ 3231 3214

 Email: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)

## Cookies

**What are cookies?** Cookies are text files stored on the end device (computer or mobile device) of a website visitor. These files are stored locally upon visiting the website.

Cookies also allow us to analyze how our website is used. They do **not** include any personal data and cannot be used to identify you on third-party websites – including analytics providers' sites.

Your **consent** is required for their use.

## Cookies Policy

### What Types of Cookies Do We Use Based on Various Criteria?

We use only **necessary cookies**, which are essential for the proper functioning of our website. These are divided into:

- **Session cookies** – Automatically deleted after closing the web browser.
- **Persistent cookies** – Remain stored on the device even after closing the browser.
- **Third-party cookies** – Created by entities other than the website operator.
- **First-party cookies** – Used for website analytics (statistical evaluation of website traffic).

This data processing is carried out in accordance with **Act No. 452/2021 Coll. on Electronic Communications**, where **§109(8)** establishes the obligation to obtain **verifiable consent** for retrieving information from the end device of a website visitor.

### Consent Under Article 6(1)(a) of the GDPR is Required for Processing Cookies That:

- Are used for the **technical storage of data or access to such data**;
- Are intended for the **transmission or facilitation of communication** via a network;
- Are **necessary for the service provider of an information society service** explicitly requested by the user;
- Must include **proof of consent** for selected groups of cookies.

Without the website visitor's consent, only **essential technical cookies** can be used. For example, cookies necessary for website functionality (like a chat window) do **not require consent**. These also include cookies for **visitor count tracking** without further identification.

## General Rules for the Use of Cookies

### Step 1: Audit Your Website

- The controller must examine the website to identify what cookies are processed, for what purpose, and how they are used.
- During this analysis, assess the **necessity and benefits** of each cookie type. A simple rule: if a cookie is not needed, it should be removed.

### Step 2: Implement a Cookie Banner on the Website

The cookie banner must:

- Allow visitors to **close** it with an "X"
- **Not block** website navigation
- Be **non-intrusive** during site visits
- Include **clear options**: Accept All / Reject All / Manage Preferences
- Allow visitors to **adjust cookie settings** (e.g., enable/disable cookies for third parties like Facebook using Facebook Pixel)
- Enable users to **change their consent at any time** (e.g., through browser settings or a cookie management panel)
- Ensure that **withdrawing consent is as simple as giving it** (e.g., if one click is needed to accept, one click should be enough to withdraw)
- Request **new consent** in case of changes to cookie use

If a third party (external company/freelancer) manages your website or processes personal data, a **data processing agreement** must be signed with them.

### Step 3: Informational Requirements Under GDPR

You must provide information on:

- **What cookies** will be used
- The **purpose** of processing
- The **legal basis**

- The **duration** of processing (recommended maximum is **13 months** from the last visit)
- **Recipients** of the data
- **Contact details** of the controller
- **Data subject rights**

### **Important Legal Consequences**

1. The **Regulatory Authority for Electronic Communications and Postal Services** may impose fines between **€200 and up to 10%** of turnover (for legal or natural persons – entrepreneurs) if §109 of Act 452/2021 Coll. is violated (see §124(1) of the Act).
2. The **Office for Personal Data Protection** may impose fines of up to **€20,000,000 or 4%** of the global annual turnover of the undertaking for non-compliance with cookie consent requirements or lack of transparent cookie information.