

PRIVACY POLICY  
OF THE HOTEL GOŁĘBIEWSKI  
IN MIKOŁAJKI



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### §1 Data of the Personal Data Controller

Gołębiowski Holding sp. z o.o. with its registered office in Ciemne; 05-250 Ciemne, Radzymin; ul. Wołomińska 125, NIP [Tax Identification Number]: 125-173-93-35, REGON [National Business Register Number]: 523380176), entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register under KRS No.: 00009996308; branches:

- Hotel Gołębiowski in Mikołajki, ul. Mrągowska 34, 11-730 Mikołajki, mikolajki@golebiowski.pl, phone No. 87 42 90 700
- Hotel Gołębiowski in Białystok, ul. Pałacowa 7, 15-064 Białystok, bialystok@golebiowski.pl, phone No. 85 67 82 500
- Hotel Gołębiowski in Wisła, al. Ks. Bp. Bursche 3, 43-460 Wisła, wisla@golebiowski.pl, phone No. 33 85 54 700
- Hotel Gołębiowski in Karpacz, ul. Karkonoska 14, 58-540 Karpacz, karpacz@golebiowski.pl, phone No. 75 76 70 740

### §2 Data Protection Officer

The Hotel has appointed a Data Protection Officer who will assist you in all matters relating to data protection, in particular answering any questions regarding the processing of your personal data. The Officer can be contacted via e-mail at: iod@golebiowski.pl

### §3 Purposes and grounds for personal data processing

In order to provide services in accordance with its business profile, the Hotel processes your personal data for various purposes, but always in accordance with the law. The personal data you provide will be processed in accordance with 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 (General Data Protection Regulation), abbreviated as GDPR. We collect your personal data during the contract conclusion process or from our booking portal partners, if you have given your consent. Below you will find the detailed purposes of the processing of your personal data together with the legal basis.

1. For the purpose of providing a service quote, booking a service and performing a service, as well as when entering into other contracts related to the business profile, we may process personal data such as:
  - Name and surname;
  - Address (street, house/apartment number, postal code and city/town);
  - Phone number;

- E-mail address;
- Company details including VAT number (in the case of issuing a VAT invoice to the company);
- The registration number of the Client's vehicle (in the event of use of the hotel car park);
- Basic bank account details for confirmation of transfer;
- Identity document No. / PESEL (National Identification Number);
- Information regarding nationality;
- Your payment card number and other card data, as well as credentials and other billing and account data linked to mobile billing;
- Any loyalty programmes such as 'golden card' or travel loyalty programmes used and membership number;
- Booking number.

The legal basis for such processing is Article 6(1)(b) of the GDPR, which allows for the processing of personal data if it is necessary for the performance of a contract or for taking steps to enter into a contract.

Children's data such as first name, surname, nationality and date of birth are collected exclusively from their parents or legal guardians in order to determine their age and the discounts to which they are entitled, and for statistical purposes (CSO obligation and local tax).

2. In order to process complaints we process personal data such as:

- Name and surname;
- Address (street, house/apartment number, postal code and city/town);
- Phone number;
- E-mail address;
- Booking number;
- Alternatively, the bank account number – if there is a refund.

The legal basis for such processing is Article 6(1)(b) of the GDPR, which allows for the processing of personal data if it is necessary for the performance of a contract or for taking steps to enter into a contract;

3. In order to operate the 'GOLDEN CARD' loyalty programme, we process such personal data as:

- Name and surname;
- Address (street, house/apartment number, postal code and city/town);
- Phone number;
- E-mail address.

The legal basis for such processing is Article 6(1)(a) GDPR, which allows us to process personal data based on freely given consent.

In order to provide a personalised service according to your individual preferences and to manage our relationship with you before, during and after your stay, we process personal data such as:



- Monitoring the use of services (telephone, bar, pay TV, etc.);
- Management of room access;
- E-mail address;
- Name and surname;
- Booking number.

The legal basis for such processing is Article 6(1)(b) of the GDPR, which allows us to process personal data if it is necessary for the performance of a contract or taking steps to enter into a contract, and Article 6(1)(a) of the GDPR, which allows us to process personal data on the basis of freely given consent.

4. For the purpose of invoicing and fulfilling other obligations under tax law, such as, for example, keeping accounting records for 5 years, we process personal data such as:

- Name and surname;
- Company;
- Address of residence or registered office address;
- NIP (Tax Identification Number);
- Booking number.

The legal basis for such processing is Article 6(1)(c) of the GDPR, which allows the processing of personal data where such processing is necessary for the Controller to comply with its obligations under the law;

5. For the purposes of surveying customer satisfaction with the services offered, auditing, improving and modifying our services, we process personal data such as:

- E-mail address;
- Booking number;
- Name and surname;
- Comments or suggestions from visitors.

The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows personal data to be processed if, by doing so, the Personal Data Controller is pursuing its legitimate interest (in this case, the Hotel's interest is to find out Client opinions on the services provided in order to tailor them to the needs and expectations of those concerned);

6. In order to ensure the security of the Hotel's employees and guests, prevent fraud, we process personal data such as:

- Data from the key card system;
- Facial image extracted from video surveillance;
- Name and surname;
- E-mail address;
- Phone number;
- IP address.

The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows personal data to be processed if, by doing so, the Data Controller is pursuing its legitimate



interest (in this case, the Hotel's interest is to ensure the security of any persons on the Hotel's premises). CCTV data is deleted after a maximum of 30 days from the date of recording.

7. In order to create records and registers relating to GDPR, including for example a register of clients who have reported an objection under GDPR, we process personal data such as:

- Name and surname;
- E-mail address.

GDPR regulations impose certain documentation obligations on us to demonstrate compliance and accountability. In the event that you report, for example, that you object to the processing of your personal data for marketing purposes, we need to know to whom not to apply direct marketing.

The legal basis for such processing is Article 6(1)(c) of the GDPR, which allows us to process personal data if such processing is necessary for the Personal Data Controller to comply with its obligations under the law (the provisions contained in the GDPR) and Article 6(1)(f) of the GDPR, which allows us to process personal data if, by doing so, the Personal Data Controller is pursuing its legitimate interest (in this case, the Hotel's interest is to know about individuals who are exercising their rights under the GDPR);

8. In order to establish, assert or defend against claims we process personal data such as:

- Name and surname (if a name has been provided) or possibly company;
- Residential address (if provided);
- PESEL (National Identification Number) or NIP (Tax Identification Number) (if provided);
- E-mail address;
- IP address;
- Booking number.

The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows personal data to be processed if, by doing so, the Personal Data Controller is pursuing its legitimate interest (in this case, the Hotel's interest is to have personal data to establish, assert or defend against claims, including those of Clients and third parties);

9. For analytical purposes, i.e. researching and analysing activity on the website belonging to the Hotel, we process personal data such as:

- Date and time of visiting the website;
- Type of operating system;
- Approximate location;
- The type of web browser used to view the website;
- Time spent on the site;
- Subpages visited;
- Subpage where a contact form was filled in.

The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows personal

data to be processed if, by doing so, the Personal Data Controller is pursuing its legitimate interest (in this case, the Hotel's interest is to learn about Client activity on the website).

10. In order to use cookies on the website, we process such textual information (cookies will be described in a separate point). The legal basis for such processing is Article 6(1)(a) of the GDPR, which allows us to process personal data on the basis of freely given consent (when you first access the website, you are asked if you agree to the use of cookies);
11. In order to administer the website we process personal data such as:
  - IP address;
  - Server date and time;
  - Browser information;
  - Information on the operating system– this data is saved automatically in so-called server logs every time the website belonging to the Hotel is accessed. Administering the website without the use of a server and without this automatic recording would not be possible. The legal basis for such processing is Article 6(1)(f) of the GDPR, which allows personal data to be processed if, by doing so, the Personal Data Controller is pursuing its legitimate interest (in this case, the Hotel's interest is the administration of the website);

## §4 Cookies

1. The Hotel uses so-called 'cookies' on its website, as do other entities, which are short text information stored on your computer, phone, tablet or other device. They can be read by our system and also by systems belonging to other entities whose services we use (e.g. Facebook, Google).
2. Cookies perform a great many functions on the website, most often useful ones, which we will try to describe below (if the information is insufficient, please contact us):
  - providing security – cookies are used to authenticate users and prevent unauthorised use of the Client panel. They therefore serve to protect your personal data from unauthorised access;
  - impact on the processes and efficiency of the use of the website – cookies are used in order for the website to function efficiently and for the functions available on the website to be used, which is possible, among other things, by remembering your settings between subsequent visits to the website. They therefore enable the website and individual pages to be navigated efficiently;
  - status of the session – cookies often store information about how visitors use the website, e.g. which subpages they view most often. They also make it possible to identify errors displayed on certain subpages. So-called 'session' cookies therefore help to improve services and the browsing experience;
  - maintaining the status of the session – if the client logs in to their panel, cookies make it possible to maintain the session. This means that you do not have to re-enter your login and password each time you go to another subpage, which contributes to the user experience of the website;

- creating statistics – cookies are used to analyse how users use the website (how many open the website, how long they stay on it, which content is the most interesting, etc.). In this way, the website can be continuously improved and adapted to users' preferences. We use Google's tools, such as Google Analytics, to track activity and produce statistics; in addition to reporting website usage statistics, the Google Analytics pixel can also be used, together with some of the cookies described above, to help display more relevant content to you on Google's services (e.g. Google search) and across the web;
  - social features – we have a so-called Facebook pixel on the website, which allows you to like our fanpage on this site when using the website. However, in order for this to be possible, we must use cookies provided by Facebook.
3. By default, your Internet browser allows the use of cookies on your device, so please consent to the use of cookies on your first visit. However, if you do not wish to use cookies when browsing the website, you can change the settings in your internet browser – block the automatic handling of cookies completely or request to be notified whenever cookies are stored on your device. You can change your settings at any time.
  4. While we respect the autonomy of all those using the website, we feel obliged to warn you that disabling or restricting the use of cookies may cause quite serious difficulties in using the website, e.g. in the form of having to log in to every subpage, longer loading times, restrictions on the use of functionalities, restrictions on liking the Facebook page, etc.

## §5 Right to withdraw consent

1. If the processing of your personal data is based on consent, you may withdraw this consent at any time .
2. If you would like to withdraw your consent to the processing of your personal data, please proceed in accordance with section 11 point 5 for this purpose. If the processing of your personal data took place on the basis of your consent, the withdrawal of your consent does not render the processing of your personal data illegal until that point. In other words, until you revoke your consent, we are entitled to process your personal data and revoking your consent does not affect the lawfulness of the previous processing.

## §6 Requirement to provide personal data

1. The provision of any personal data is voluntary and at your discretion. However, in some cases, the provision of certain personal data is necessary in order to fulfil your expectations with regard to the use of the services.
2. In order to request a service from the Hotel, it is necessary to provide the data indicated in point 3 A of this Privacy Policy.
3. In order for you to be able to receive an invoice for the services, it is necessary that you provide all the data required by tax law – without this we are unable to correctly issue the invoice.

4. In order to be able to contact you by telephone regarding the service, it is necessary to provide a telephone number and e-mail address – without this we are unable to make telephone contact or send a booking confirmation.

## §7 Automated decision-making and profiling

We kindly inform you that we do not carry out automated decision-making, including on the basis of profiling. The content of the enquiry, which is sent via the form, is not assessed by the IT system. The proposed price of the service is given on the basis of our Hotel's price list.

## §8 Recipients of personal data

1. Like most entrepreneurs, we rely on the assistance of others in our business, which often involves the transfer of personal data. Therefore, if necessary, we share your personal data with lawyers cooperating with us to perform services, companies handling fast payments, accounting company, hosting company, company in charge of sending text messages, as well as insurance company (should there be a need to repair a damage).
2. In addition to this, it may also happen that, for example, on the basis of a relevant legal provision or a decision of a competent authority, we have to share your personal data with other authorities or entities.

## §9 Transfer of personal data to third countries

1. Like most businesses, we use a variety of popular services and technologies, offered by entities such as Facebook, Microsoft, Google or Zendesk. These companies are based outside the European Union and are therefore considered third countries under the GDPR.
2. The GDPR introduces certain restrictions on the transfer of personal data to third countries because, since European legislation does not apply there, in principle, the protection of personal data of EU citizens may unfortunately be insufficient. Therefore, each personal data controller is obliged to establish a legal basis for such transfers.
3. For our part, we assure you that when using these services and technologies, we only transfer personal data to entities in the United States and only to those that have joined the Privacy Shield programme, based on the European Commission's implementing decision of 12 July 2016 – you can read more about this on the European Commission website available at: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield\\_pl](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_pl). Entities that have signed up to the Privacy Shield programme guarantee that they will comply with the high data protection standards that apply in the European Union, so the use of their services and the technologies they offer in the processing of personal data is lawful.
4. We will provide you with further clarification on the transfer of personal data at



any time, in particular if the issue is of concern to you.

## §10 Period of processing of personal data

1. In accordance with current legislation, we do not process your personal data 'indefinitely', but for the period of time that is necessary to achieve the stated purpose. After this period, your personal data will be irreversibly deleted or destroyed.
2. Where we do not need to perform operations on your personal data other than storing them (e.g. when we store the contents of an order for the purpose of defence against claims), we additionally protect them – by pseudonymisation – until they are permanently deleted or destroyed. Pseudonymisation involves encrypting personal data, or a set of personal data, in such a way that it cannot be read without an additional key, and therefore such information becomes completely useless to an unauthorised person.
3. Regarding the specific processing periods for personal data, we kindly inform you that we process personal data for the period of:
  - the duration of the contract – for personal data processed for the purpose of concluding and performing the contract;
  - 3 years or 10 years + 1 year – with regard to personal data processed for the purpose of establishing, asserting or defending claims (the length of the period depends on whether both parties are entrepreneurs or not);
  - 6 months – with regard to personal data collected in the course of pricing a service and at the same time the contract was not concluded immediately;
  - years – with regard to personal data involving the fulfilment of obligations under tax law;
  - until the consent is withdrawn or the purpose of the processing is achieved, but for no longer than 5 years – for personal data processed on the basis of consent;
  - until an effective objection is lodged or the purpose of the processing is achieved, but for no longer than 5 years – in relation to personal data processed on the basis of the legitimate interest of the Personal Data Controller or for marketing purposes;
  - until it becomes obsolete or is no longer relevant, but for a maximum of 3 years, with regard to personal data processed mainly for analytical purposes, the use of cookies and website administration.
4. We count the periods in years from the end of the year in which we started processing personal data in order to facilitate the process of deletion or destruction of personal data. Counting the period separately for each concluded contract would involve significant organisational and technical difficulties, as well as a significant financial outlay, so establishing a single date for the deletion or destruction of personal data allows us to manage the process more efficiently. Of course, if you exercise your right to be forgotten, such situations are dealt with on a case-by-case basis.
5. The additional year associated with the processing of personal data collected

for the performance of a contract is dictated by the fact that, hypothetically, you may make a claim moments before the expiry of the limitation period, the demand may be served with a material delay or you may misstate the limitation period for your claim.

## §11 Rights of data subjects

1. We inform you that you have the right to:
  - access your personal data;
  - rectify your personal data;
  - delete your personal data;
  - restrict the processing of your personal data;
  - object to the processing of your personal data;
  - be forgotten in the event that other legal provisions allow it;
  - receive a copy of your data;
  - portability of personal data.
2. We respect your rights under data protection legislation and strive to facilitate the exercise of these rights to the greatest extent possible.
3. We would like to point out that the rights listed are not absolute and that we may therefore legitimately refuse to comply with them in certain situations. However, if we refuse to grant a request, it is only after careful consideration and only if the refusal to grant the request is necessary.
4. Regarding the right to object, we clarify that you have the right to object at any time to the processing of personal data on the basis of legitimate interests of the Personal Data Controller (these are listed in point III) in relation to your particular situation. However, you must bear in mind that, according to the regulations, we may refuse to take your objection into account if we show that:
  - there are legitimate grounds for the processing which override your interests, rights and freedoms, or
  - there are grounds for the establishment, assertion or defence of claims.
5. Furthermore, you may object at any time to the processing of your personal data for marketing purposes. In such circumstances, we will cease processing for this purpose upon receipt of an objection.
6. You can exercise your rights in the following ways:
  - by sending an e-mail to the Data Protection Officer at: [iod@golebiewski.pl](mailto:iod@golebiewski.pl)
  - or by sending such a request to the Data Protection Officer at ul. Wołomińska 125, Ciemne, 05-250 Radzymin;
  - or by handing it to the receptionist when you visit one of our Hotels.

## §12 Right to lodge a complaint

If you believe that your personal data is being processed in violation of applicable law, you may lodge a complaint with the President of the Office for Personal Data Protection.



## §13 Final provisions

1. To the extent not covered by this Privacy Policy, the data protection regulations apply.
2. The Hotel reserves the right to amend this Privacy Policy with the proviso that services made prior to the amendment of the Privacy Policy shall be subject to the version in force at the time of booking the service.
3. Changes to the Privacy Policy must not affect the acquired rights of Guests.
4. Information on changes to the Privacy Policy will be published on the Hotel's website: [www.golebiewski.pl](http://www.golebiewski.pl) 14 calendar days prior to the effective date of such changes.
5. This Privacy Policy is effective as of 01 March 2023.