

## **Topolowa Residence Privacy Policy 20.05.2018**



What makes Topolowa Residence distinct from other lodging establishments is great attention to detail, individual approach and the wish to provide the highest standard of comfort to our guests.

Our Privacy Policy is an expression of our concern for the privacy and security of all people using our services. We wish for our guests to fully understand how their personal data is processed and protected.

Privacy Policy has been prepared in two languages: Polish and English, with the provision that all disputes and claims referring to its content will be considered only with regard to its Polish language version.

### **1. Who we are**

Topolowa Residence is a young, independent lodging establishment, operating from March 2014.

The terms used in the policy, such as “Topolowa Residence”, “lodging establishment”, “hotel” „apartments”, „premises” refer to the business entity: Apartamenty Topolowa S.C. Artur Dobrowolski Katarzyna Dobrowolska (NIP) 675-14-95-778, ul. Topolowa 27, 31-506 Kraków.

„Service” means hotel service provided by Topolowa Residence with accordance to Law of 29 August 1997 on tourist services (Office Journal 1997, No. 133, item 884).

The terms „guests”, “ you”, „yours” refer to people that have used the services provided by Topolowa Residence and whose personal data is processed by the hotel.

The term „website” refers to the internet domain <http://www.topolowaresidence.pl>.

Topolowa Residence is the „controller of personal data”, which means that it outlines the purposes and scope of its processing and is responsible for the security of the data belonging to the hotel’s guests (the „data subjects”), who are entitled to a series of rights and freedoms.

Personal data is processed by Topolowa Residence at safe locations, in accordance with the law acts regulating personal data protection. The level of access to the data is specified through the requirements related to the position in question and is restricted to the necessary group of employees only.

The services provided by Topolowa Residence are not dedicated to people under 16 years old. Such people may use our services only with a formal consent of their parents or legal guardians. Topolowa Residence is entitled to store and process only this information about children which was shared by their parents or legal guardians or with their consent. In case we come in possession of data of a minor of under 16 years of age without a formal consent of their parent or legal guardian, we reserve the right to delete this data.

## 2. What data do we collect?

Personal data is the information that allows personal identification of a specific, individual (natural) person.

When making a **reservation** at Topolowa Residence you may be asked to share your basic personal data, such as:

- Name;
- Surname;
- Telephone number;
- Address;
- e-mail address;

and, in some cases, additional information, such as:

- credit card information;
- payment information;
- names and surnames of your fellow travellers;
- your preferences or other additional information specified during the making of reservation

We collect your personal data when you share them directly with us, as well as when you let third parties share them with us.

Among the third parties that share personal data with us are:

- Profitroom
- Booking.com
- Expedia and its partners
- HRS
- hotele.pl (eTravel S.A.)

During **check-in** at Topolowa Residence you will be asked to share the following personal data:

- Name;
- Surname;
- Date of birth;
- Country of residence;
- Names and surnames of fellow travellers;
- Fellow travellers' dates of birth;
- Number of accompanying minors ;
- E-mail address

and, in some cases:

- Sex;
- Address for the issue of the invoice;
- Telephone number.

## 3. When do we process personal data?

Guests' personal data can only be processed by Topolowa Residence in the following cases:

- **On the basis of a consent of the data subject.**  
Hotel's guest may be asked to give consent to receive specified marketing communication. The consent can be withheld at any moment.
- **If the processing is necessary for reservation purposes and for the service to be provided correctly.**

We process personal data because it is necessary for the correct performance of the contract between us and the guest or for the actions that need to be taken so that it is concluded. Without the information about the guest's name and surname we would not be able to check them in, whereas without the processing of their e-mail address or telephone number, we would not be able to contact them with regard to their visit. In short, not being able to process the mentioned personal data, Topolowa Residence could not finish the reservation process nor provide the highest quality service that we aim for;

- **If the processing is necessary for Topolowa Residence in order to meet its legal obligations.**

- **If the processing is necessary to protect the vital interests of our guests.**

We may process personal data in order to protect life or health of those present at the premises.

- **If the processing is necessary for the purposes resulting from the legitimate interests of Topolowa Residence or third parties, except where the interests or basic rights and freedoms of our guests override them.**

More about the legitimate interests in section 7 of Privacy Policy.

#### 4. How long do we store your data?

According to the minimisation principle, we store your personal data as long as it is required by the law and necessary for the purpose the data was collected for.

Please also note that we can store the mentioned data longer in order to protect the rights, property and security of the hotel or our partners as well as for archiving purposes.

#### 5. Personal data sharing.

Listed below are the purposes of our potential sharing of personal data to third parties:

- **Performance of the contract**

We may share your personal data to third parties like our partners and intermediaries (e.g. tour operators and travel companies) whenever it is necessary for the provision of services. Your data may also be processed by the providers of reservation engines.

- **If it is required by law**

We may share our guests' data provided that it is required by the law, for example in order to prevent terrorism, for tax procedure purposes and whenever it is essential in prevention, detection and prosecution of offenders.

- **For marketing and communications purposes**

Following your formal consent, we may share your personal data to third parties such as customer service and marketing campaign tools, e-mail communication tools, software for analysis (for marketing purposes) and data visualisation tools (for analytic purposes).

In the event of a merger or takeover, we may be required to share your personal data with the potential seller or buyer.

In case any of our partners should have their headquarters outside of European Economic Area (EEA), we will share our guests' personal data only on the basis of justified exceptions in specific situations or if appropriate security measures are ensured, or on condition that enforceable rights of data subjects and effective legal remedies for data protection are available in the third country.

## 6. What are your rights?

Law grants each one of us a series of important rights with regard to personal data, among which there are:

- **Right to be informed**  
You have the right to be informed about the means in which we process your personal data.
- **Right of access and to portability of data**  
We are obliged to provide you with access to your stored personal data and enable its proper reuse for your own purposes (the information will be presented within one month of the date of the receipt of the request).
- **Right of rectification**  
You are entitled to revise or update your personal data in case it is incorrect or has changed.
- **Right to erasure**  
You are entitled to request us to erase the processed personal data of yours.
- **Right to be forgotten**  
In case we have made your personal data public, you are entitled to request us to delete or hide this information.
- **Right to restriction of processing**  
You are entitled to request us to stop the processing of your personal data.
- **Right to object**  
If your opinion is that our justified interests may infringe your rights, you are entitled to refuse your consent for the processing of the information relating to this legal base.

**If you are not satisfied with our means of processing of your personal data, you are entitled to lodge a complaint to the competent supervisory authority.**

Please note that each of listed rights may be limited by other laws and regulations.

## 7. Legitimate interests.

Justified interest is a specific legal basis of data processing and it indicates that we are allowed to process personal data when it is necessary in order to attain an objective, when we have reasonable ground for it and we do not prejudice your rights and freedoms.

Our legitimate interest is to provide a marvellous stay at the Topolowa Residence apartments. We believe that all of our guests are interested in the best and most secure experience possible.

We recognize that according to our legitimate interest we are entitled to process your personal data as follows:

- For inner administrative purposes, the management of your stay and the use of reservation engines for apartments and hotels.
- In order to appropriately manage the security of our networks and information, as well as to prevent possible frauds and other illegal or adverse actions.

## 8. Consent

We believe that if you have used our services, it is in your best interest to receive personalised updates and information about our offers and promotions.

With your consent, we are entitled to process your data for the following purposes:

- provision of personalised marketing communication;
- customer analysis, customer satisfaction surveys and CRM (Customer Relationship Management);
- promotional information about our offer;
- means of informing you about all changes in the services that we provide.

The above mentioned communication will be established with due respect to your privacy.

You are entitled to withdraw your consent at any moment through direct contact with us.

## 9. Cookie policy - [www.topolowaresidence.pl](http://www.topolowaresidence.pl)

**Our website [www.topolowaresidence.pl](http://www.topolowaresidence.pl) does not automatically collect any information, except for the information contained in cookie files. Cookie files are small text files stored in the terminal equipment of the user. They enable us to recognize you and store the information about your current activity and your preferences, so that we can personalize and improve [www.topolowaresidence.pl](http://www.topolowaresidence.pl)**

Cookie files and similar technologies may store data such as language preferences, information about previous visits and passwords.

We use the following cookie files:

Custom cookies – these are the cookie files that allow the basic use of our website [www.topolowaresidence.pl](http://www.topolowaresidence.pl)

Personalized cookies – these are the cookie files that allow personalization of our website [www.topolowaresidence.pl](http://www.topolowaresidence.pl), for example by remembering the preferred language.

Analytic cookies – these are the cookie files that allow us to verify in what way do you use our website [www.topolowaresidence.pl](http://www.topolowaresidence.pl), so that we can understand how to improve it.

By using our website [www.topolowaresidence.pl](http://www.topolowaresidence.pl), you allow for the described cookie files to be placed on your terminal equipment. At any moment you are entitled to withdraw your consent. In case you would like to remove our cookies, you can do it by changing the settings of your web browser.

Please note that blocking or removing cookie files may lead to some functions of our website [www.topolowaresidence.pl](http://www.topolowaresidence.pl) becoming unavailable.

## 10. Contact information

Topolowa Residence

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