



Izjava o zaštiti podataka i privatnosti

HOTEL MORE d.o.o., sa sjedištem u Dubrovniku, Kardinala Stepinca 33, OIB: 74412010990 (dalje: Hotel) u cilju zaštite Vaših osobnih podataka, sve sukladno Općoj odredbi o zaštiti podataka (Službeni list Europske unije L119, 4) i Zakonu o provedbi Opće uredbe o zaštiti podataka (Narodne Novine br. 42/2018), ovim putem daje sve informacije o tome koje Vaše osobne podatke i na koji način prikuplja i obrađuje.

Ukoliko budete koristili bilo koju od naših usluga primjerice uslugu smještaja, usluga u našim restoranima, ili usluge naših partnera vezano uz izlete i transfere, pristajete na prikupljanje i obradu Vaših osobnih podataka sve kako je to dalje propisano ovom Izjavom.

Ovim putem vas obavještavamo kako imate sljedeća prava:

- ❖ informiranje kako se Vaši podaci prikupljaju, upotrebljavaju, daju na uvid ili na drugi način obrađuju
- ❖ podnošenje zahtjev za izdavanjem preslike Vaših osobnih podataka koji se obrađuju, bez naknade
- ❖ zatražiti ispravljanje netočno navedenih osobnih podataka
- ❖ brisanje osobnih podataka, uključivo onih s interneta, uz iznimku onih koje je Hotel dužan prikupljati i čuvati na temelju nekog od pozitivnih propisa (zakonska obveza)
- ❖ ograničenje obrade osobnih podataka
- ❖ podnijeti prigovor i uskratiti suglasnost prilikom prvog kontakta Hotela radi nuđenja usluga ili proizvoda za potrebe izravnog marketinga (newsletter).

U slučaju da imate bilo kakav prigovor ili pitanje vezano uz prikupljanje ili obradu Vaših osobnih podataka, posebice onih koji se odnose na one koji se prikupljaju u svrhu realizacije naše poslovne djelatnosti, isti možete uputiti putem recepcije našeg Hotela odnosno pisanim putem na našu adresu HOTEL MORE d.o.o., Kardinala Stepinca 33, 20 000 Dubrovnik, Hrvatska. Po Vašem zahtjevu postupit ćemo bez odgode odnosno najkasnije u roku od 30 dana te Vas obavijestiti o radnjama koje smo poduzeli.

Tehničke i organizacijske mjere zaštite Vaših osobnih podataka

U cilju zaštite Vaših osobnih podataka od manipulacije, gubitaka, prijetnji ili prijestupa od strane neovlaštenih osoba poduzimamo različite mjere zaštite, i to mjere informatičke sigurnosti, mjere tehničke zaštite te razne organizacijske mjere. Cilj ovih mjera je osigurati da Vašim osobnim podacima



moгу pristupiti samo za to određene osobe kojima je to nužno radi izvršenja točno određenih zadataka iz djelatnosti Hotela, u opsegu koji je za izvršavanje tih poslova propisan ili nužan. Naše sigurnosne mjere će se kontinuirano unaprjeđivati sukladno tehnološkom razvoju.

Kao mjere informatičke sigurnosti poduzete su sve mjere koje bi mogle osigurati sigurno davanje i prijenos Vaših osobnih podataka i finansijskih sredstava prilikom rezerviranja smještaja ili neke slične aktivnosti putem naše web stranice ili drugih rezervacijskih kanala enkripcijom istih, bez mogućnosti zlouporabe. Istim ili sličnim mjerama zaštićujemo korištenje Vaših osobnih podataka i od internih rizika, kako u odnosu na pristup istima od strane neovlaštenih zaposlenika tako i od strane tvrtki koji održavaju naš rezervacijski sustav i centralizirane rezervacijske sustave s kojima imamo posebne ugovore. S takvim tvrtkama smo obzirom na uvid u Vaše osobne podatke zaključili posebne klauzule o povjerljivosti podataka te smo sa pružateljem IT usluga proveli zaštitu podataka na našim serverima na najvišoj razini. Dokumentacija koja sadrži povlaštene podatke i osobne podatke koji uživaju posebnu zaštitu se nalazi pod zaštitom od neovlaštenog pristupa odnosno u zaključanim prostorima dostupnima samo za to određenom osoblju.

Raznim pravilnicima i postupcima propisali smo opseg, način i vrste prikupljanja osobnih podataka i za to ovlaštene osobe, u koju svrhu smo obavili edukacije osoblja kako bi bili upoznati sa istima u cilju provođenja za Hotel jako važne politike zaštite Vaših osobnih podataka a time osiguranja Vašeg povjerenja u Hotel.

Naši poslovni partneri, većinom turističke i putničke agencije, te prijevoznici, koji pružaju dodatne usluge za naše goste, a koji posredno dobivaju Vaše osobne podatke prema privoli koju dajete recepciji Hotela prilikom rezervacije tih usluga, su se ugovorno obvezali primjenjivati sve mjere zaštite Vaših osobnih podataka kako je to određeno i ovom Izjavom odnosno Općom uredbom o zaštiti podataka.

Jednake mjere zaštite osobnih podataka su ugovorno prihvatili primijeniti i svi dobavljači roba, i izvođači radova, s kojima se Hotel nalazi u poslovnom odnosu.

Od strane poslovnih partnera iz ovog stavka prikupljamo kontakt podatke njihovih zaposlenika (npr. ime i prezime, broj poslovnog telefona i mobitela, e-mail adresu). Ove podatke čuvamo do prestanka poslovne suradnje te ih ne dostavljamo trećim osobama ni iznosimo u inozemstvo.

Gosti / korisnici usluga Hotela

Vaše osobne podatke prikupljamo i obrađujemo u slučajevima kada:

- postoji zakonska obveza,
- kada nas angažirate za pružanje neke usluge, pa to proizlazi iz ugovorne obveze,
- te uz Vašu pisanu privolu, u različite svrhe.

Neki od razloga su:

- ❖ organizacija pružanja usluge smještaja, pansionerske i vanpansionerske prehrane, svadbi i drugih
- ❖ svečanih i poslovnih događanja (bili sudionik ili posjetitelj) putem Vaše rezervacije odnosno upita



- ❖ plaćanje svih korištenih hotelskih usluga (smještaj, trošak učinjen u restoranima, barovima, wellnessu, mini baru, room service-u, i sl.) u koju svrhu se prikuplja podatak kreditne kartice gosta/korisnika usluga
- ❖ prijava i odjava gosta iz Hotela u kojem slučaju se prikupljaju i prenose podaci o boravku na osnovi zakonske regulative
- ❖ anketiranje zadovoljstva gosta Hotelom i njegovim sadržajima i uslugama sve u svrhu poboljšanja kvalitete i udovoljenja propisanim standardima, kao i ostvarenje kontakta iz razloga udovoljenja svim upitima i eventualnim prigovorima na uslugu
- ❖ udovoljavanje propisima iz područja mjenjačkih poslova u postupcima promjene deviza
- ❖ zaštita sigurnosti i imovine sustavom video nadzora; dio unutarnjih i vanjskih prostora Hotela je pod video nadzorom, na kojim mjestima su vidljive obavijesti o tome.

Podaci koji se u gore navedene svrhe od Vas prikupljaju, kao i od osoba koji s Vama putuju mogu biti: ime i prezime, datum rođenja, podaci kreditne kartice, broj identifikacijske isprave, državljanstvo, e-mail adresa, period boravka u Hotelu, mjesto prelaska Hrvatske granice, potrošnja hotelskih usluga, informacije o vremenu slijetanja ili polijetanja aviona i aviokompaniji kojom letite, iznimno broj sobe, podatci o svečanim ili poslovnim eventima koje organizirate u našem prostoru sa brojem i imenima sudionika, ali i druge podatke koje nam dragovoljno date.

Podatke o zdravlju i religijskim uvjerenjima nam možete dragovoljno dati jedino u slučaju kada su isti neophodni za Vašu sigurnost tijekom korištenja naših usluga i boravka u Hotelu npr. smještaj i kretanje osobe s invaliditetom, postojanje alergije na neku hranu i sl.

Vodeći računa o zaštiti privatnosti djece ne prikupljamo i ne obrađujemo podatke o osobama za koje znamo da su mlađe od 16 godina bez prethodne privole njihovog zakonskog zastupnika. Zakonski zastupnik ima pravo zahtijevati uvid u podatke koje je dalo dijete te može tražiti njihovo brisanje.

Način na koji dolazimo do Vaših osobnih podataka će u većini slučajeva biti neposrednim putem, direktno od Vas, i to putem e-maila, telefonskog razgovora, on-line rezervacijskih obrazaca i web stranica, ali i od putničkih i turističkih agencija, organizatora svečanih ili poslovnih događanja, izdavatelja kreditnih kartica, poslovnih banaka i sl. Ne odgovaramo za način saznanja i privole za korištenje Vaših osobnih podataka od strane trećih osoba, te ćemo smatrati da su podaci koji dobivamo od istih točni, prikupljeni uz Vašu privolu i zakonit način, te da i te treće strane prihvaćaju sva propisana pravila iz područja zaštite osobnih podataka. Ne možemo odgovarati za postupanje sa Vašim osobnim podacima od strane treće strane prethodno ustupanju nama.

Drugi primatelji Vaših osobnih podataka

Obzirom da u Hotelu posređujemo i u pružanju dodatnih turističkih i sličnih usluga, i to od strane partnerskih putničkih i turističkih agencija, agencija za vjenčanja, taxi prijevoznika, pravnih i fizičkih osoba za najam vozila i brodice, tvrtki i osoba za najam sportske opreme i organizaciju sportskih i rekreativnih aktivnosti i sl, te možemo za Vas kontaktirati treće osobe koji pružaju različite usluge na Vaše traženje, istima je potrebno dati nužne osobne podatke kojima postaje moguće potvrditi Vaše sudjelovanje u tim



aktivnostima ili uslugama. Naše partnerske agencije također pisano tražimo za povjerljivost Vaših osobnim podataka.

Vaše osobne podatke možemo otkriti u slučaju kada je to naša zakonska obveza, u slučajevima kada postupamo po zahtjevima raznih državnih tijela i institucija, zatim da bismo zaštitili naša bitna prava ili prava naših gostiju, zaposlenika i javnosti, te u djelovanju u slučaju nužde.

Rokovi čuvanja osobnih podataka

Pohrana Vaših podataka je ograničena na minimum, samo onoliko koliko je potrebno da se svrha prikupljanja i obrade ostvari i/ili ispuni zakonska obveza čuvanja.

Podatak o kreditnoj kartici brišemo 15 dana od objave odnosno od predviđenog odlaska ukoliko se ne pojavite. Račune sukladno pozitivnim propisima čuvamo 11 godina.

Iznimno, Vaše osobne podatke čuvamo i duže u slučaju spornih situacija do njihova razrješenja.

Istekom navedenih rokova na papiru pohranjene osobne podatke uništavamo rezanjem ili paljenjem, a one elektronički pohranjene brišemo u potpunosti.

Društvene mreže i marketing / Newsletter

Uz Vaš pristanak ovlaštteni smo upotrijebiti s Vaše strane stvoren sadržaj kao što su fotografije s društvenih medija u svrhu oglašavanja na web mjestima i aplikacijama.

Naši gosti i poslovni partneri, te treće osobe od kojih dobijemo kontakt podatke uslijed nekog poslovnog odnosa, mogu dobiti naše newslettere koje šaljemo u svrhu promocije naših novih usluga, posebnih pogodnosti i akcija, i sl.

U slučaju da ne želite primati naše newslettere možete se u svako doba odjaviti klikom na *unsubscribe* ili upućivanjem prigovora slanjem povratnog e-maila, u kojem slučaju ćemo brisati Vaše osobne podatke kako Vam ih dalje ne bi slali.

Pružanje usluga interneta i web poveznice

Vaša uporaba internetske usluge u Hotelu je podložna uvjetima uporabe i pravilima o privatnosti pružatelja internetske usluge.

Naša web stranica može sadržavati poveznice na web stranice trećih strana. Hotel nije odgovoran za prikupljanje i uporabu podataka od strane tih trećih strana.



Sustav video nadzora

U našim prostorima, kako unutar objekta tako i na vanjskim površinama, kao naš legitimni interes koristimo sustav video nadzora radi:

- ❖ zaštite sigurnosti gostiju, zaposlenika i prolaznika koji se iz bilo kojeg razloga nađu na prostoru pod kontrolom Hotela,
- ❖ kontrole svih ulaza objekta radi smanjenja izloženosti zaposlenika razbojstvima, provalama, vandalizmu, krađi i sličnih događaja na radu ili u vezi s radom,
- ❖ zaštite imovine Hotela, te sprječavanje neovlaštenih ulaza u prostore Hotela,
- ❖ povećanja zaštite osoba i smanjenja svih rizika vezano uz obavljanje mjenjačkih poslova.

Do automatskog brisanja snimki dolazi svakih 7 dana presnimavanjem, a pristup sustavu video nadzora imaju samo ovlaštene osobe. Snimke se od strane ovlaštene osobe analiziraju u slučaju kada postoji opravdan razlog za to. Takve snimke se mogu čuvati duže sve dok za to postoji potreba.

Snimke sustava video nadzora se iznimno prosljeđuju državnim tijelima kada to isti zatraže npr. MUP, državno odvjetništvo, sudovi, razni inspektorati i sl. Snimke se mogu koristiti kao dokaz u sudskom, upravnom ili drugom postupku, sukladno važećim procesnim pravilima. Snimke se ne prenose u inozemstvo.



Statement of Data Protection and Privacy

HOTEL MORE, d.o.o., headquartered in Dubrovnik, at Kardinal Stepinca 33, National Identification No. (OIB): 74412010990 (in subsequent text: the Hotel) for the purpose of protecting personal data, in accordance with the General Regulations of Data Protection (Official publication of the European Union L119, 4) and the Law governing the implementation of General Regulations for Data Protection (Official Gazette no. 42/2018), in this manner provides all information regarding your personal data and in the way in which it is gathered and processed.

To the extent that you use any of our services, for example, accommodation services, restaurant facilities, or our partnering services connected with excursions and transfers, you accept the gathering and processing of your data, as is further described in this declaration.

In this manner, we wish to inform you of the following rights at your disposal:

- ❖ We wish to inform you how your data is gathered, its usage, evidenced or otherwise processed.
- ❖ At your request, a visual copy of your personal data which has been processed will be provided, free of charge
- ❖ You may wish to correct any inaccurate personal information
- ❖ You may choose to erase your personal information, including data obtained from the internet, with the exception of that which the Hotel is bound to collect and preserve, based on our legal obligation and regulations (legal requirements)
- ❖ Limitations to the processing of personal data.
- ❖ You may file a complaint and modify your consent at your earliest opportunity, contact the Hotel in regarding any subsequent offering of services or products for the intent of direct marketing (our newsletter).

In the event that you have any complains or questions regarding the collection or processing of your personal data, especially that which relates to the data used for the purpose of realizing our professional activities, you may notify us directly, at the reception in our Hotel, or in written format to our address, HOTEL MORE d.o.o., Kardinala Stepinca 33, 20000 Dubrovnik, Republic of Croatia. In accordance with your request, we shall respond without any delay within a period of no later than 30 days in regards to those actions assigned to us on your behalf.

Technical and organizational measures of protection for your personal data

With the aim of protecting your personal data from manipulation, loss, threat or access by any unauthorized individuals, we have taken on different measures of protection, and as a measure of information security, measures of technical protection as well as various organizational measures.



The purpose of these measures is to insure that your personal data may be accessed only by those authorized individuals which, due to necessary activities to be executed for specific purposes from a range of Hotel activities, to the extent which is prescribed or necessary for the execution of those activities. Our security measures will be continually updated in accordance with technical developments and advancements.

As a measure of informational security, we have taken all measures at our disposal to ensure the safe dispensation and transferring of your personal data and financial resources at the moment of reserving accommodations, or any other related activity via of our website or other reservation canals of encryption, without any possibility of misuse. In the same way, similar measures have been adopted to protect your personal data from any internal risks, as well as access to your data by unauthorized personnel as well as by other companies which maintain our reservation system and centralized reservation system, with whom we have a special agreement. In regards to our association with these firms, in consideration to your personal data, we have prepared special clauses regarding data confidentiality, and in regard to our IT service provider, we have implemented data protection on our internet servers at the highest level.

Documentation which now contains preferential details and personal data which are now within such personal protection may be found under the protection against any unauthorized access, respectively in locked areas which only specially designated personnel are allowed access.

By means of different regulations and procedures, we have described the scope, method and types of gathering personal data to authorized personnel, for the purpose of conducting employee education to our staff in order to familiarize them of the Hotel's objectives and very important political stance in protecting your personal data to further ensure your trust and confidence in the Hotel.

Our professional partners, which are predominantly tourist and travel agencies, as well as transportation firms and companies providing additional services to our guests, who may, in the course of business, indirectly receive your personal information according to the location you provide to the hotel reception upon booking these services, are contractually obliged to apply all protective measures towards your personal data as determined by this Declaration or by the General Data Protection Act.

Universal measures of protection for personal data have been contractually accepted by all distributors of goods and other contractors with whom the Hotel has formed a professional relationship.

On the part of professional business partners from this paragraph, the gathering of personal data by their employees is limited to contact details (i.e. Name and surname, business phone and cellular phone, and email address). These personal details are protected until the professional cooperation is completed, and we do not provide these details to any third party nor are they forwarded abroad.

Guests / users of Hotel services

Your personal data which has been gathered and processed in cases when:

- there exists a legal obligation to do so,
- when our services have been arranged, in order to carry out the agreed upon duties



- in accordance with your written permission, for different purposes.

Some of the reasons include:

- ❖ Organization or providing accommodation services, dining and off-site dining options, wedding and other festive occasions and professional events (as a participant or as a guest) via your reservation or inquiry.
- ❖ Payment for the use of all hotel services (accommodation, other expenses incurred in restaurants, bars, wellness spas, mini bars, room service, and other such expenses) for the purpose of collecting credit card data of the guest/user of these services.
- ❖ Checking in and checking out of the Hotel in which case the collection and transmission of data regarding the length of stay is legally required
- ❖ Surveying the satisfaction Hotel guests regarding the facilities as well as the services for the purpose of the continually improved quality and fulfillment of regulative standards, as well as creating contact for the objective of fulfilling all queries, including the possibility of service complaints
- ❖ Compliance with legal regulations in the area of currency exchange in foreign currency exchange procedures.
- ❖ Protection of one's security and property are conducted via a video control system, partially inside and outside of the Hotel space, in which areas posted information of such video control may be seen.

The personal details which have been gathered above may include: your name and surname, date of birth, credit card details, personal identification card number, nationality, email address, length of stay at the Hotel, entrance point for the Republic of Croatia, hotel services used, information regarding flight departure times, airfare provider and flight number, exceptionally your room number, details regarding festivities or a business event which will be organized in your space with the number of and names of participants, as well as other data which you voluntarily provide.

Details regarding health and religious faith may be given to us freely, only in cases when they are relevant for your security during the time of using our services and during your stay at the Hotel, i.e. The exact location of your room for movement by individuals who are invalids, or those with an allergy to some types of food, etc.

Keeping in mind the protection of children, we do not gather information of any individual who we know is under the age of 16 without the permission of their legal guardian. This legal guardian has the right to request a review of any data which may have been provided by the child and request the erasure of such data.

The method by which we come into contact with your personal data shall be, in the majority of cases, be directly provided to us by you personally, through email, telephone conversation, on-line reservation forms and websites, as well as tourist and travel agencies, organizers of festivities or professional events, issuers of credit cards, business banks, and other. We cannot comment regarding the method of use and discovery of your personal data by third parties, as we must consider that the data received by same is in



fact accurate, was gathered with your permission in a legal way, by which said third parties have encompassed all written rules within the area of personal data and its protection. We are also not responsible for the handling of your personal data by third parties who had access to such data prior to us.

Other recipients of your personal Data

Considering that the Hotel mediates by in providing tourist and other related services through partnering tour agencies, agency for organizing weddings, taxi service providers, legal and physical persons for the rental of automobiles and small boats, firms and individuals who rent sports equipment and organize sporting and recreational activities etc., we are in a position to contact these third parties who may require your personal data for the processing of your request for participation in the aforementioned activities or services. We also seek from our partnering agencies a written confidentiality clause regarding the protection of your personal data.

Your personal data may be revealed in cases when it is our legal responsibility to do so, in cases when we are assigned to do so by different state bodies and institutions, therefore, in order to protect our relevant rights and the rights of our guests, employees and the general public, i.e. in cases of absolute necessity.

Time frames for the keeping of personal data

Archiving your data is restricted to a minimum, only to the extent as needed for the purpose of gathering and processing to create and/or fulfill a legal obligation of archival.

Credit card details are erased 15 days following the departure or the expected departure in the case of a no-show. Hotel bills are retained, in accordance with legal regulations, for a period of 11 years.

Exceptionally, your personal details may be kept for a longer period of time in the event of a lawsuit until its resolution is finalized.

Expiration of the aforementioned time frames for paper archiving of personal data is destroyed via shredding or burning, and all electronic data is completely erased.

Social network and marketing / Newsletter

With your permission, we will be authorized to use your data which we may use as photos for social media for the purpose of advertising our websites and applications.

Our guests and business partners, as well as third party individuals receive contact information due to a business relationship, may receive our newsletters which we distribute for the purpose of promoting our latest services, features and special offers, etc.

In the event that you do not wish to receive our newsletters, you may at any time cancel by clicking on *unsubscribe* or send a complaint by email, in which case we shall remove all your personal data by which



we can no longer send you any mail.

Offers for internet service and web links

Your use of the hotel internet service is bound by the terms and conditions and the privacy policy of the internet provider.

Our website may contain third-party links. The hotel is not responsible for the collection and processing of your personal data by third parties.

System of Video control

A video system is in place within the parameters, both inside as well as outside the premises, as well as in locations of our legitimate interests for the purpose of:

- ❖ Protecting the security of our guests, employees, and passers-by who for whichever reason, find themselves on the area controlled by the Hotel.
- ❖ Control of all entrances to the facility reduces employees' exposure to burglary, break-in's, vandalism, theft and similar workplace or work related events,
- ❖ Protection of Hotel property, preventing unauthorized entrance into Hotel areas,
- ❖ Increased protection of individuals and the reduction of risk connected to foreign exchange activities.

To the automatic erasure of filming occurs after every 7 days of video, and access to the video control system is limited to authorized individuals only. The video film may be viewed and analyzed by authorized individuals only when a justifiable reason exists to do so. This film may be archived and kept for as long as a need for such exists.

The filming of video control is exceptionally accessible to state control bodies as warranted and required, for example, the police department, state attorney, court, different investigative inspectors, and other similar cases. This video recording may be used as evidence in court, administrative or other proceedings, in accordance with valid rights of procedure. Such video recordings may not be issued outside of the Republic of Croatia.