SUN GARDENS
DUBROVNIK

INFORMATION
on collecting and processing personal data

Dubrovački vrtovi sunca d.o.o. (*hereinafter: "the Company")* dedicates a lot of attention to the protection and processing of personal data. In performing its registered activity, the Company processes personal data following all the applicable laws and regulations.

(1) The responsible party for data processing is the controller:

DUBROVAČKI VRTOVI SUNCA d.o.o., HR - 20234 Orašac, Na Moru 1, OIB: 40198223665,
T. +385 (0)20 361 500, F. +385 (0)20 361 651 info@sungardensdubrovnik.com,
www.sungardensdubrovnik.com

(2) The Data Protection Officer (DPO) is:
MARKO ANIĆ, T. +385 1 889 1027, Email: dpo@sungardensdubrovnik.com

(3) If we use external service providers to process your personal data ("Processors"), this is order-based processing (of personal data). In that case, we are still responsible for the protection of your personal data. In processing your personal data, we do not use service providers from outside the EU. Exceptionally, if it should prove important, we will do this if there is a European Commission decision on the appropriateness of such a third country, or if we have contracted appropriate guarantees or conformity with compulsory personal data protection regulations with the service provider as the processor.

This Information on collecting and processing personal data *(hereinafter: "Information"*) describes which data we collect, how we process it, what we use it for, as well as your rights related to your data. The purpose of this Information is to inform you about all the relevant features of the collection of your personal data, as well as its processing and storage. The listed applies to all personal data you have transferred to us via electronic, written or verbal communication or that we have received through a travel agency and other businesses with whom you are (and if you are) in a contractual or other similar relationship, as well as data collected from other sources.

Personal data that we collect

We process the following personal data:

a) **Your basic personal data** made available to us by you or by third parties during reservation - first name, family name, country, city, residential address, email address, telephone number, age of your child, first name and family name of your child and date of birth (for the purpose of identification and possible discounts), special requests and habits, and data on your co-passengers; **data required to fulfil the reservation -** credit card number, **contact information in emergency cases -** first name and family name, telephone number; **other required data -** email address, **health data -** in case of requests for a special dietary regime

or a doctor, **data related to web use -** IP address, visits to the website, social network data, and similar data related to Internet browser use.

b) Guest check-in and check-out - First name and family name, date of birth, sex, personal document number (identity card, passport, driver's licence), credit card number, country of birth, place of birth, nationality/citizenship, visa number if the guest is subject to a visa regime, border crossing or location of entry into the Republic of Croatia, date of the guest's arrival at the facility and date of departure.

c) Hotel services usage - data on guests' expenditures during their stay in the hotel. Data is collected on the type of service provided and its price, e.g.: room service, list of telephone calls, minibar usage, bar usage, à la carte, list of films viewed, data related to web use - IP address, website visits, social network data and similar data related to the use of Internet browsers, the use of transport services, excursions etc. Data on guests' special requests are also collected so that the Company can provide the required quality service.

d) Monitoring and improving the quality of hotel services - first name and family name, sex, age, country from which the guest is coming and length of stay in the hotel, ratings for individual types of services, comments. Data collection is voluntary.

The purpose of collecting personal data and the legal basis for processing

The Company determines the purpose and the means to process personal data and is in that sense the controller of the personal data. The basic purpose of collecting personal data is the legal obligation and/or concluding and executing contracts on accommodation and providing hospitality and tourism services, or so that actions may be taken at your request before and during the contract. The scope of the personal data collected depends on the purpose of the contract that you intend to conclude or that you are concluding, or the request to exercise rights (the type of service provided and price). Actions at your request before the conclusion of the contract mean checking your requests and needs, checking the appropriateness or applicability of our products and services to your special circumstances, as needed, all with the goal of creating an offer and/or an informative price figure. If you are not a contractual party but a person exercising a right from an allotment contract, travel agency contract etc., the purpose of collecting your personal data is to comply with the Company's obligation arising from the concluded contract, or the collection of your data is required so that the contract may be concluded, or the users of the service may be identified, e.g. in Internet platforms for online reservations. In this case, the scope of the personal data collected by us depends on the type of the request we received, and the information necessary to fulfil the request. The purpose of the processing of the personal data may be the Company's obligation to fulfil contracted services with such a service provider.

Your basic personal data, and data from guest check-in and checkout are processed pursuant to the legal obligation to enter the guests into the eVISITOR system, in accordance with the Ordinance on the manner of keeping the register of tourists and on the form and content of the tourist registration form for the Tourist Board, and the Soujourn Tax Act, or for the purposes of the Ministry of the Interior, in accordance with the Foreigners Act, and the provision of the listed data is required during reservation (in case of amendments and supplementations of the regulations and/or new regulations, these will be immediately applied to this Information). This data is erased after being transferred to the eVISITOR system or after transferring the data to the Ministry of the Interior.

Following this, the collection of personal data, considering the defined purpose, represents a legal and contractual obligation and a necessary precondition for the conclusion of contracts. If you refuse to provide certain data, we will not be able to fulfil our legal or contractual obligations, resulting in the impossibility of concluding a contract for accommodation, hospitality and tourism services, or the impossibility of fulfilling the contractual obligation.

The data required for the fulfilment of the contractual obligation of using hotel services are required so that we can confirm the reservation by way of a deposit, in accordance with the Company's internal regulations, and it is not possible to reserve or conclude an accommodation contract without revealing the mentioned data, which stored until the end of the accommodation contract.

The credit card number is collected because it is required for concluding and executing the contract with the guest. It is used as insurance for the payment of accommodation costs and costs of other services that might be incurred if the guest does not settle his or her debt towards the Company. The mentioned data is also used for service payment.

The data on the usage of hotel services is collected and processed for the purpose of fulfilling contractual obligations. Data on guests' spending during their stay at the hotel are also collected to execute the contract with the guests, and so that a receipt may be issued for the services provided.

Emergency contact information are processed on the basis of legitimate interest, i.e. potential situations where it is necessary and urgent to transmit certain relevant information to your close ones (in case of extraordinary circumstances, such as sickness, accidents, etc.). Other required data, i.e. email address, is processed based on a legitimate interest in good communication between the contractual parties for the purpose of fulfilling all aspects of the contract, i.e. easier communication in the sense of organising your arrival and reserving the accommodation itself, and this data is also erased when the accommodation service contract expires.

Special personal data categories

In principle, the following types of personal data are not processed: data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of the unique identification of individuals, and data related to health, sex life and an individual's sexual orientation.

The above-mentioned personal data categories are nevertheless processed by the Company in the following situations: 1) if the guest has provided explicit consent to the processing of this personal data, and for one or several determined purposes, except if applicable regulations state that such a consent does not have an effect; 2) processing is important for the protection of a vitally important interest for the Subject or another individual, if the guest cannot physically or legally provide consent; 3) processing is related to personal data obviously made public by the guest, 4) processing is required for the establishment, fulfilment, or defence of legal requirements, or whenever courts act in their capacity as courts; 5) processing is necessary for the purpose of significant public interest, on the basis of applicable regulations and in proportion to the desired goal, with respect to the essence of data protection rights, and ensured appropriate and special measures for the protection of the Subject's basic rights and interests; 6) processing is required for the purpose of preventive medicine, medical diagnosis, the provision of health or social care or treatment, or management of health or social systems and services, pursuant to applicable regulations.

All your personal data transferred to us by you or by a Third Party is processed in accordance with the goal of their processing (whereby we mention that, if you are travelling with children under 16 years of age, their personal data, regardless of the basis, is only processed with your explicit consent).

There is a possibility of using the internal surveillance camera network and other security measures in our facilities, whereby we may take images or record guests, and process information related to your location while you are in our facility (by way of key cards and other technologies), all for the purpose of the legitimate interest of maintaining safety.

Links to websites and Third Party services

Our website and our mobile programmes, Wi-Fi network, and IPTV system record your usage data for the purpose of issuing receipts and contain links to Third Party websites. Bear in mind that we are not responsible for the collection, usage, maintenance, exchange or publishing of data and information by these Third Parties. If you provide data to Third Party websites i.e. use them, the privacy rules and terms and conditions of these websites apply. We recommend that you read the privacy rules of the website you are visiting before providing personal data.

The Company will conduct all reasonable measures to protect your personal data from unauthorised access, disclosure, modification or erasure, and will keep the personal data precise and updated as far as possible. We request our partners and service providers with whom we share personal data to invest reasonable efforts into maintaining the confidentiality

of your personal data. For network transactions, we apply a reasonable level of technological measures in order to protect the personal data you share with us via our website. However, it should be noted that no security system or Internet data transfer system can guarantee complete safety.

Legitimate interests of the Company as the purpose of processing personal data

Your personal data will be processed for the purpose of our legitimate interests, except when your interests or your basic rights and freedoms, requiring personal data protection, take precedence. The legitimate interest of the Company, in that sense, is processing personal data for the purpose of direct marketing, so that our service may completely adapt to your needs and wishes (e.g. special family packages etc.). The mentioned data may also be used for our internal statistical and analytical purposes.

You can object to this legitimate interest of the Company at any moment and, in that case, we will no longer process your data for that purpose, which will not affect the legality of the processing until the day of withdrawal.

Consent

Consent is the legal basis for collecting personal data on monitoring the quality of hotel services. The Company cares about your opinion on the services provided and, for that purpose, we ask you to fill in so-called quality surveys so that you can rate us. This allows us to analyse various aspects of our service, so that we can develop it and improve it even more.

The survey informs the guest that providing any personal data is voluntary. The guests decide for themselves whether or not they will fill in the survey, and they decide for themselves whether they will list personal data and, if so, which ones. If the processing of the previously mentioned data is based on your consent, the data mentioned is processed until you withdraw your consent or request its erasure. In accordance with the above, based on your consent, we may also process other personal data outside of those listed in this Information. Related to the above, please note that, in accordance with the applicable regulations, the Company nevertheless does not conduct erasure, despite the request of the Subject, if the processing of this personal data is necessary: a) to comply with a legal obligation that requires processing, and the Company being subject to this obligation, b) to exercise the right to freedom of expression and information; c) for a public interest in the area of public health; d) for the purpose of public interest, historical or scientific research, or for statistical purposes, i.e. for compliance with or defence of legal requirements.

In processing your personal data based on your consent, we partially apply automated processes for processing or profiling, so that contact with you may be of a more individual nature and so that we can adapt our service completely to your needs and wishes (e.g. special family packages etc.).

In case of providing marketing consent, for which we request your explicit approval, your personal data may, in exceptional cases, be involved in automated processing, based on which your profile will be created for the purpose of analysing the services provided and your rights, as well as for the purpose of improving the quality of the business relationship. Automated decision-making, including profile creation, will be conducted in cases of creating your client profile for the purpose of analysing the services provided and your rights, as well as to improve the quality of the business relationship and to process data based on an approval for marketing purposes, with the goal being to improve the quality of the business relationship and marketing, and so that we can specifically inform you about benefits and new features of our offer. If such processing of personal data is not required for the conclusion or execution of the contract, you have the right to request that a person employed by the Company decides on the outcome of the processing, the right to express your own viewpoint, and the right to object to a decision made through automated processing. We also hereby mention that the usage of your personal data for marketing purposes is only possible pursuant to your explicit consent. Should you provide such consent to us, we will duly provide information about all benefits, discounts, events and associated services that we believe might be of interest to you. You can withdraw this consent at any moment by notifying us via the contact information listed in the introductory section of this Information.

To whom will your personal data be disclosed?

The Company ensures that your personal data is processed exclusively for the purposes listed in this document. The purpose of personal data processing will require that your personal data is disclosed and that, in addition to the Company, other companies and persons process it as processors. Processor categories receiving your data include: government and public authorities, in accordance with the Company's legal obligations, health care institutions, information or legal services providers, delivery service providers etc. The collected personal data may be transferred to other hotels within our group, or to entrepreneurs providing services that you may find of interest, in accordance with your enquiry (e.g. related to rent-a-car or rent-a-boat services, tickets for a particular event, cinema, theatre, restaurants, etc.).

Personal data processors, with the exception of government and public authorities, process data exclusively according the Company's instructions, thereby abiding by the technical and organisational measures in order to ensure the protection of your rights.

Where will your personal data be processed

Processing of your personal data may be conducted within or outside of the European Economic Area, but will in any case be performed by processors whose responsibilities and obligations to protect personal data, as well as applicable technical and organisational security measures prescribed by the contractual relationship, are in conformity with all legal regulations governing the protection of personal data.

Period during which the personal data will be stored

Your personal data will be stored only for as long as necessary to fulfil the purpose of its processing. The period of storing personal data depends on the aim of the collection. If it is an accommodation contract or contract on providing hotel, hospitality and tourism services, this period shall be defined by the duration of the contract itself, i.e. by charging for these services, in the sense of legal obligations to keep records. An extension of this period is prescribed by the internal rules of the Company, which in turn depend on legally prescribed statutes of limitations for claims, or this time may be extended considering the legally defined storage periods, such as in the case of accounting documents.

Rights related to the collected personal data

In relation to the data you have disclosed to us, you have (I) the right to access the personal data being processed, (II) the right to modify or erase personal data, (III) the right to limit processing, (IV) the right to object to processing, (V) the right to transfer data to another controller, (VI) the right to withdraw consent, (VII) the right to submit a complaint to a supervisory authority. To exercise all of the rights listed herein, simply inform us in accordance with the contact information from the introduction to this Information.

For more information, our website www.sungardensdubrovnik.com includes our personal data Protection Policy.

The right to submit a complaint to a supervisory authority

At any moment, you may submit a complaint concerning the processing of your personal data to the competent supervisory authority, in accordance with the Act on the Implementation of the General Data Protection Regulation, or other legislation governing the protection of personal data and defining supervisory authorities regarding the processing of personal data.

Other information

This Information may change from time to time. When significant changes are made to this Information, we will publish a link to the modified Information on the homepage of our website. All changes to the Information will enter into force after the publication of the modified Information on the website.

This Information on collecting and processing personal data is applied as of 25 May 2018 in accordance with the 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 (*General Data Protection Regulation* - GDPR).[1]

RECEIPT CONFIRMATION FOR THIS INFORMATION ON COLLECTING AND PROCESSING PERSONAL DATA

Your signature confirms the receipt of this Information:

DATE _____ SIGNATURE _____

CONSENT FOR COLLECTING AND PROCESSING PERSONAL DATA

I consent to the Company's collection and processing of the personal data I have disclosed on an appropriate form for the purpose from this Information. For more information, our personal data Protection Policy is presented on our website www.sungardensdubrovnik.com (mark with a check mark in the marking field):

☐ YES, I CONSENT ☐ NO, I DO NOT CONSENT

EXPLICIT CONSENT FOR COLLECTING AND PROCESSING PERSONAL DATA

For special personal data categories related to health etc., I consent to the Company's collection and processing of the personal data I have disclosed, in accordance with the above-mentioned. For more information, our personal data Protection Policy is presented on our website www.sungardensdubrovnik.com (mark with a check mark in the marking field):

☐ YES, I CONSENT ☐ NO, I DO NOT CONSENT

EXPLICIT CONSENT FOR COLLECTING AND PROCESSING PERSONAL DATA FOR MARKETING PURPOSES

I consent to the Company's collection and processing of the personal data I have disclosed for marketing purposes, and in accordance with this Information. For more information, our personal data Protection Policy is presented on our website www.sungardensdubrovnik.com (mark with a check mark in the marking field):

☐ YES, I CONSENT ☐ NO, I DO NOT CONSENT

[1] Note: All expressions used in the text with a gendered meaning, regardless of their use in male or female gender, are gender-neutral.