

# DUTY TO INFORM FOR GUESTS AND POTENTIAL GUESTS

**Energie – nemovitostní a.s.**, with its registered office at Vašíčkova 3081, Postal Code 272 04 Kladno, Business ID No.: 02459779, registered in the Commercial Register maintained by the Municipal Court in Prague under File No. B 19535 (hereinafter the “**Company**”), as the controller, in accordance with Regulation No. 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data (hereinafter the “**Regulation**”), version effective as of May 25, 2018, hereby informs its guests and potential guests (hereinafter the “**Data Subjects**”) of the processing of their personal data.

The Company places high priority on protecting the privacy and personal data of guests and potential guests. We consider personal data to be confidential, and we treat it accordingly. In processing personal data, we place a high emphasis on security, choosing appropriate contractual partners with access to the personal data of potential clients and clients, and strict adherence to all the rules that apply to us.

The Company hereby informs the Data Subjects that it processes their personal data based on the following legal grounds and for the following purposes:

## a) Reservations for Accommodations

Legal grounds:	performing contractual obligations
Data subject:	future guest with a reservation
Purpose:	reservation of services associated with accommodation in a hotel
Retention period	i) for the duration of the reservation ii) in the necessary scope after the reservation until the statute of limitations on any claim on the part of the Company and/or Data Subjects has passed

## b) Guest Accommodations

### a. Providing accommodation services

Legal grounds:	performing contractual obligations
Data subject:	guest
Purpose:	providing accommodation services
Retention period	i) for the duration of providing the accommodation services ii) in the necessary scope after the reservation until the statute of limitations on any claim on the part of the Company and/or Data Subjects has passed

### b. Bookkeeping

Legal grounds:	meeting obligations imposed by law
Data subject:	guest
Purpose:	bookkeeping records for payment of fees
Retention period	i) for a period of six years after the last entry ii) in the necessary scope after the reservation until the statute of limitations has passed on any claim on the part of the Company and/or

### c. Log book

Legal grounds:	meeting obligations imposed by law
Data subject:	guest (if a natural person who is not a citizen of the Czech Republic, including EU citizens)
Purpose:	keeping a log book for inspection by the police
Retention period	i) for the period of six years ii) in the necessary scope after the reservation until the statute of limitations has passed on any claim on the part of the Company and/or

### d. Reporting stays

Legal grounds:	meeting obligations imposed by law
Data subject:	guest (if a natural person who is not a citizen of the Czech Republic, including EU citizens)
Purpose:	reporting stays by foreigners
Retention period	i) for the period of six years after the end of the foreigner's stay ii) in the necessary scope after the reservation until the statute of limitations has passed on any claim on the part of the Company

### c) Sending by (e-mail) commercial offers for goods and services to guests and future guests with reservations

Legal grounds:	legitimate interest
Data subject:	guest, future guest with a reservation
Purpose:	offering transactions and services
Retention period:	three years, unless the Data Subject states that they do not consent to receive offers

### d) Sending commercial offers for goods and services to potential guests

Legal grounds:	consent to personal data processing
Data subject:	potential guest
Purpose:	offering transactions and services
Retention period:	three years, or until the Data Subject revokes consent

### e) CCTV system monitoring

Legal grounds:	legitimate interest – protection of property
Data subject:	guests and any person (including employees) entering the monitored area
Purpose:	protection of property
Retention period:	CCTV recordings will be held for a period of seven days

For more information on personal data processing via CCTV, the Data Subject may review the document Information on Processing the Personal Data of Natural Persons via a CCTV system, which is available at: [www.pronajmyenas.cz](http://www.pronajmyenas.cz)

Personal data processed under d) is voluntary, and thus provided by the Data Subjects voluntarily.

Once granted, the consent can be revoked at any time with effect in the future by a written statement sent to our Company's address. The Data Subject may not be sanctioned by the Company in any way for not granting consent or revoking consent once granted. Granting, not granting, or granting and later revoking any consent to processing personal data has no effect on the performance of the contractual relationship between the Company as the service provider and the Data Subject. The Data Subject can revoke consent once granted by sending a written statement to the Company's address.

The Data Subject's personal data will be processed both automatically and manually by Company employees. However, the Company does not make any individual decisions in automated form, including profiling.

The personal data can be disclosed/handed over for processing in the scope absolutely necessary to the following recipients:

- i. Travel agencies or other corporations
- ii. Websites for making reservations on accommodations (booking.com, bookassist.org)
- iii. Hotel catering provider
- iv. External bookkeeping company

The Company informs the Data Subject that under the conditions stipulated in the Regulation, the Data Subject has the following rights with regard to the Company:

- Right to access – the Data Subject can request the Company for access to their personal data processed by the Company. The Company will also provide a copy of the personal data being processed.
- Right to correction – the Data Subject can request the Company to correct any inaccurate or incomplete personal data processed by the Company.
- Right to deletion – the Data Subject can request the Company to delete their personal data in one of the following situations:
  - a. the personal data is no longer needed for the purposes for which it was collected or otherwise processed;
  - b. the Data Subject revoked the consent based on which the personal data was processed, and there are no other legal grounds for processing it;
  - c. the Data Subject objected to being the subject of a decision based on automated processing of their personal data, and there is no overriding legitimate reason for their processing in this manner, or the Data Subject objected to the processing of their personal data for the purposes of direct marketing;
  - d. the Data Subject's personal data was processed unlawfully;
  - e. the Data Subject's personal data must be deleted in order to meet the legal obligations stipulated in EU law or a member state's law applying to the controller;
  - f. the Data Subject's personal data was collected in connection with an offer of information society services

- Right to restricted processing – the Data Subject can request the Company to restrict the processing of their personal data in one of the following situations:
  - a. If the Customer denies the accuracy of the Personal Data, for the period necessary for the Company to verify the accuracy of the Personal Data;
  - b. If the processing of the Data Subject's personal data is unlawful and the Data Subject refuses the deletion of their Personal Data and requests instead that its use be restricted;
  - c. If the Company no longer needs the Personal Data for processing, but the Data Subject requests the Personal Data in order to determine, exercise or defend their legal claims;
  - d. If the Customer objected to the processing of their personal data pursuant to Section 21(1) of the Regulation, then until it can be verified whether the Company's legitimate reasons outweigh those of the Customer
- Right to data transferability – in cases anticipated by the GDPR, the Data Subject has the right to acquire the personal data concerning them that they provided to the Company, in a structured, commonly used and machine-readable format; this right must not have an unfavourable effect on the rights and freedoms of other persons
- Right to revoke consent – if the Data Subject's personal data is processed on the basis of consent, the Data Subject has the right to revoke their consent at any time to processing their personal data for the purpose for which they granted the consent
- Right to raise an objection – the Data Subject can object at any time to the processing of their personal data by or for the Company for the purposes of direct marketing performed on the basis of the Company's legitimate interest
- Right to make a complaint – the Data Subject has the right to make a complaint with the supervisory body, which is the Office for the Protection of Personal Data, Pplk. Sochora 27, 170 00 Praha 7, [www.uoou.cz](http://www.uoou.cz)

The Data Subject can contact the Company in writing at the Company's registered office or by email at: [gdpr@e-nem.cz](mailto:gdpr@e-nem.cz) in order to exercise their rights.

The Data Subject has hereby been informed of their rights and protection of their rights pursuant to Section 13 through 22 of the Regulation.