

INFORMATION ON THE PROCESSING OF PERSONAL DATA by Trans World Hotels & Entertainment, a.s.

HOTEL CUSTOMERS

1. INTRODUCTORY PROVISIONS

Trans World Hotels & Entertainment, a.s., with its registered office at No. 64, Česká Kubice, Postcode 345 32, Company ID No.: 643 58 267, registered in the Commercial Register maintained by the Regional Court in Pilsen, Section B, File No. 492 (hereinafter referred to as “**TWHE**”), is a company which operates the **Trans World Hotel Savannah**, located at No. 198, Chvalovice-Hatě, Znojmo, Postcode 669 02.

Based on its scope of business, TWHE acts as the data controller for its customers, as required by Regulation 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 (hereinafter referred to as the “**GDPR**”).

The purpose of this text is to inform you, as a TWHE customer, of how, for what purpose and based on what legal reason, within the meaning of Article 6 (1) of the GDPR, we process your personal data.

2. PROCESSING BASED ON THE FULFILLMENT OF A LEGAL OBLIGATION

TWHE processes personal data that is necessary to fulfill a legal obligation.

CITIZENS OF THE CZECH REPUBLIC

2.1. Local Fees Act

Under the generally binding ordinance of the municipality of Chvalovice No. 7/2012, on local fees, applicable to the Trans World Hotel Savannah, TWHE, as an accommodation provider, is obliged to collect a fee from the accommodation capacity. Pursuant to this generally binding ordinance, in conjunction with Act No. 565/1990 Coll., on local fees, the accommodation provider is obliged to keep a record book in order to record and, consequently, process the following personal data:

- Name
- Surname
- Address of permanent residence or permanent residence abroad
- ID card number and type of ID
- Date of arrival
- Date of departure
- Purpose of stay

All of the aforementioned personal data is obtained by TWHE from the registration form which is completed when checking in the Savannah Hotel.

2.2. Purpose of the processing of personal data

All of the personal data listed in this article is processed by TWHE for the purposes of proper operation of accommodation services.

2.3. Period of keeping personal data

Pursuant to Act No. 565/1995 Coll., on local fees, TWHE is obliged to keep the personal data referred to in Article 2.1 for the period of 6 years after the last entry in the record book.

TWHE keeps the record book in electronic form and original of registration form management. Personal data is therefore kept in the record book for the period of 6 years from the moment of ending the accommodation.

2.4. Access to personal data

The personal data listed in this article is made available to the TWHE employees working in the following departments or positions:

- Reception
- Front Office Manager
- Reservation Manager
- Food & Beverage Manager, to the following extent only: name, surname, date of arrival, date of departure

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- management
- Sales Manager

The personal data listed in this article is processed by TWHE, but it may also be processed for TWHE by the following processors:

- Espiral s.r.o., Company ID No.: 283 12 546, with its registered office at Slámová 1013/72, Černovice, 618 00 Brno, registered in the Commercial Register maintained by the Regional Court in Brno, Section C, File No. 60561, which provides TWHE with services in marketing;
- Amadeus Hospitality Netherlands B.V. ("Amadeus"), having its principal place of business at Chasséveld 15-G, 4811 DH Breda, The Netherlands, which provides the company with the IDPMS system for storing customers' personal data and for keeping records of the accommodated persons.
- HRS Praha | Hospitality and Retail Systems Budějovická 1550/15a, 140 00 Praha 4, Česká republika, which provides the company with the FIDELIO system for storing customers' personal data and for keeping records of the accommodated persons.

2.5. Other information on the processing of personal data

In the event of failure to provide personal data under this article, the data subject may not be allowed to stay at the Savannah Hotel.

FOREIGNERS

TWHE processes personal data that is necessary to fulfill a legal obligation.

2.6. Act on the residence of aliens in the territory of the Czech Republic

Pursuant to Act No. 326/1999 Coll., on the residence of aliens in the territory of the Czech Republic, the accommodation provider is obliged to keep a house book in

order to record and, consequently, process the following personal data:

- Name
- Surname
- Date of birth
- Citizenship
- Address of permanent residence abroad
- Travel document and visa number and type of ID
- Start of stay
- Estimated length of stay
- Purpose of stay

All of the aforementioned personal data is obtained by TWHE from the registration form which you complete when checking in the Savannah Hotel.

2.7. Purpose of the processing of personal data

All of the personal data listed in this article is processed by TWHE for the purposes of proper operation of accommodation services.

2.8. Period of keeping personal data

Pursuant to Act No. 326/1999 Coll., on the residence of aliens in the territory of the Czech Republic, TWHE is obliged to keep the personal data referred to in Article 2.6 for the period of 6 years after the last entry in the house book.

TWHE keeps the record book in electronic form. Personal data is therefore kept for the period of 6 years from the moment of ending the accommodation. TWHE also keeps the record book in paper form, in which personal data is kept for the period of 6 years after the last entry.

2.9. Access to personal data

The personal data listed in this article is made available to the TWHE employees working in the following departments or positions:

- Reception

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- Front Office Manager
- Reservation Manager
- Food & Beverage Manager, to the following extent only: name, surname, date of arrival, date of departure
- management
- Sales Manager

2.10. Other information on the processing of personal data

In the event of failure to provide personal data under this article, you may not be allowed to stay at the Savannah Hotel.

3. PROCESSING BASED ON CONSENT

TWHE processes personal data based on your consent.

3.1. Scope of personal data

Based on the data subject's consent, TWHE processes the following personal data:

- Name
- Surname
- Telephone number
- Email

3.2. Purpose of the processing of personal data

The personal data processed pursuant to this article is processed by TWHE for the purpose of sending commercial communications.

The personal data pursuant to this article is processed if TWHE has not obtained your personal data in connection with the provision of accommodation services or if TWHE does not offer its own accommodation services within commercial communications.

3.3. Period of keeping personal data

The personal data processed pursuant to this article is kept by TWHE for the period of 5 years.

The personal data pursuant to this article is kept in electronic form.

After the personal data retention period has elapsed, the personal data will be erased from TWHE's database.

3.4. Access to personal data

The personal data listed in this article is made available to the TWHE employees working in the following departments or positions:

- Reception
- Hotel Management and Director
- Sales Manager
- Marketing Department

The personal data listed in this article is processed by TWHE, but it may also be processed for TWHE by the following processors:

- Espiral s.r.o., Company ID No.: 283 12 546, with its registered office at Slámová 1013/72, Černovice, 618 00 Brno, registered in the Commercial Register maintained by the Regional Court in Brno, Section C, File No. 60561, which provides TWHE with services in marketing;
- Amadeus Hospitality Netherlands B.V. ("Amadeus"), having its principal place of business at Chasséveld 15-G, 4811 DH Breda, The Netherlands, which provides the company with the IDPMS system for storing customers' personal data and for keeping records of the accommodated persons.
- HRS Praha | Hospitality and Retail Systems Budějovická 1550/15a, 140 00 Praha 4, Česká republika, which provides the company with the FIDELIO system for storing customers' personal data and for keeping records of the accommodated persons.

3.5. Other information on the processing of personal data

You are not obliged to provide TWHE with the personal data listed in this article. If you do not provide the personal data listed in this article, you will not be sent commercial communications.

You are entitled to withdraw consent to the processing of personal data at any time using the following contact details:

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- email: Reception.Savannah@TWHotels.eu
- telephone number : +420 515 284 084
- address: Chvalovice - Hatě 198, , 669 02 Znojmo
- Front Office Manager
- Reservation Manager
- Spa Receptionist, to the following extent only: name, surname, date of birth, language of registration, transactions within the programme

4. PROCESSING BASED ON CONTRACT PERFORMANCE SAVANNAH GOLD PROGRAM

TWHE processes personal data that is necessary for the performance of a contract concluded with you the subject of which is participation in the Savannah Gold Program loyalty programme.

4.1. Scope of personal data

Based on the performance of the contract, TWHE processes the following personal data:

- Email
- Name
- Surname
- Address
- Telephone number
- Date of birth
- Language of registration
- Overview of transactions

4.2. Purpose of the processing of personal data

The purpose of the processing is to enable your participation in the Savannah Gold Program loyalty programme at TWHE and to fulfil the rights and obligations arising from the contract between you and TWHE the subject of which is participation in the loyalty programme.

4.3. Period of keeping personal data

The aforementioned data is kept by TWHE for the duration of your participation in the Savannah Gold Program loyalty programme, i.e. for the effective period of the contract for such participation. Personal data is only kept electronically in TWHE's internal system.

After the personal data retention period has elapsed, the personal data defined in this article will be erased from TWHE's internal system.

4.4. Access to personal data

The personal data listed in this article is made available to the TWHE employees working in the following departments or positions:

- Reception

- Food & Beverage Manager, to the following extent only: name, surname, date of birth, language of registration, transactions within the programme
- Hotel Management and Director
- Sales Manager

The personal data listed in this article is processed by TWHE, but it may also be processed for TWHE by the following processors:

- Espiral s.r.o., Company ID No.: 283 12 546, with its registered office at Slámova 1013/72, Černovice, 618 00 Brno, registered in the Commercial Register maintained by the Regional Court in Brno, Section C, File No. 60561, Savannah Gold Program system provider;
- Amadeus Hospitality Netherlands B.V. ("Amadeus"), having its principal place of business at Chasséveld 15-G, 4811 DH Breda, The Netherlands, which provides the company with the IDPMS system for storing customers' personal data and for keeping records of the accommodated persons;
- HRS Praha | Hospitality and Retail Systems Budějovická 1550/15a, 140 00 Praha 4, Česká republika, which provides the company with the FIDELIO system for storing customers' personal data and for keeping records of the accommodated persons.

4.5. Other information on the processing of personal data

In the event of failure to provide personal data under this article, the contract between you and TWHE cannot be

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performed and you may not be allowed to participate in the Savannah Gold Program loyalty programme.

CONTRACT FOR THE PROVISION OF ACCOMMODATION SERVICES

TWHE processes personal data that is necessary for the performance of a contract concluded with you the subject of which is provision of accommodation services.

4.6. Scope of personal data

Based on the performance of the contract, TWHE processes the following personal data:

- Credit card number, including expiration date
- Room number
- Email
- Telephone number
- Language of registration

4.7. Purpose of the processing of personal data

The purpose of the processing of this personal data is to fulfil the rights and obligations arising from the contract for the provision of accommodation services, in particular documents of making payment for accommodation(f.e. restaurant, SPA Wellness etc), as well as communication with you during booking and within the accommodation itself.

4.8. Period of keeping personal data

The aforementioned data is kept by TWHE until the period of three months has elapsed after the end of your accommodation at the Savannah Hotel in order to enable communication with you in the event of any disputes arising from the accommodation contract. If the payment for accommodation is made after the period of three months has elapsed after the end of your accommodation at the Savannah Hotel, the personal data is kept until the payment has been received.

After the personal data retention period has elapsed, the personal data defined in this article will be erased from TWHE's internal system and paper documents destroyed.

4.9. Access to personal data

The personal data listed in this article is made available to the TWHE employees working in the following departments or positions:

- Reception
- Front Office Manager
- Reservation Manager

- Food & Beverage Manager, only the room number
- Spa Receptionist, only the room number
- Hotel Management and Director
- Sales Manager

Personal data is made available to the TWHE employees in the Food & Beverage Manager or Spa Receptionist position only if you use the Restaurant or Spa services.

The personal data listed in this article is processed by TWHE, but it may also be processed for TWHE by the following processors:

- Espiral s.r.o., Company ID No.: 283 12 546, with its registered office at Slámova 1013/72, Černovice, 618 00 Brno, registered in the Commercial Register maintained by the Regional Court in Brno, Section C, File No. 60561, Savannah Gold Program system provider;
- Amadeus Hospitality Netherlands B.V. ("Amadeus"), having its principal place of business at Chasséveld 15-G, 4811 DH Breda, The Netherlands, which provides the company with the IDPMS system for storing customers' personal data and for keeping records of the accommodated persons;
- HRS Praha | Hospitality and Retail Systems Budějovická 1550/15a, 140 00 Praha 4, Česká republika, which provides the company with the FIDELIO system for storing customers' personal data and for keeping records of the accommodated persons.

4.10. Other information on the processing of personal data

In the event of failure to provide personal data under this article, the contract between you and TWHE cannot be performed and you may not be allowed to stay at the Savannah Hotel.

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5. PROCESSING BASED ON LEGITIMATE INTEREST

TWHE processes personal data that is necessary for the purposes of its legitimate interests.

CCTV SYSTEM

5.1. Scope of personal data

TWHE operates a CCTV system on the following hotel premises:

- reception
- lobby
- restaurant
- swimming pool
- car park (indoor and outdoor)
- lift

5.2. Purpose of the processing of personal data

The purpose of the processing of personal data is to protect the property of TWHE and the hotel guests, given the fact that the property and funds of TWHE and hotel guests are often handled, and personal belongings are put down, on the premises where the CCTV system is placed. The purpose of the processing of personal data using the CCTV system at the hotel's swimming pool is also to ensure surveillance over the activity at this swimming pool.

5.3. Period of keeping personal data

The CCTV system recordings are kept by TWHE for one week.

5.4. Access to personal data

The personal data listed in this article is made available to the TWHE employees working in the following departments or positions:

- Reception
- Front Office Manager
- management
- Camera Surveillance Department

5.5. Other information on the processing of personal data, proportionality test

In order to protect TWHE's property, your property and the property of other guests of the Savannah Hotel, and in order to carry out surveillance over the activity at the hotel

swimming pool, the use of a CCTV system seems to be the most effective way to achieve the desired goals. In such a case, it is necessary to interfere with your right to privacy due to TWHE's interest in operating the CCTV system and carrying out the aforementioned protection.

TWHE operates the CCTV system in the minimum scope possible, including the limitation of camera recording retention period.

MARKETING

5.6. Scope of personal data

TWHE processes your personal information under this article in the following scope:

- Name
- Surname
- Address
- Telephone number
- Email

5.7. Purpose of the processing of personal data

The purpose of the processing of personal data is to send commercial communications. TWHE has a legitimate interest in carrying out direct marketing for its services.

The personal data pursuant to this article is only processed if TWHE has obtained your personal data in connection with the provision of accommodation services and if TWHE offers accommodation services within commercial communications.

5.8. Period of keeping personal data

The personal data processed pursuant to this article is kept by TWHE for the period of 5 years.

The personal data pursuant to this article is kept in electronic form.

After the personal data retention period has elapsed, the personal data will be erased from TWHE's database.

5.9. Access to personal data

The personal data listed in this article is made available to the TWHE employees working in the following departments or positions:

- Reception
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- Sales Manager
- Marketing Department

The personal data listed in this article is processed by TWHE, but it may also be processed for TWHE by the following processors:

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- HRS Praha | Hospitality and Retail Systems Budějovická 1550/15a, 140 00 Praha 4, Česká republika, which provides the company with the FIDELIO system for storing customers' personal data and for keeping records of the accommodated persons.

5.10. Other information on the processing of personal data

If you do not wish to receive commercial communications, you can unsubscribe from their sending at any time using the link sent in each commercial communication.

6. RIGHTS OF THE DATA SUBJECT

Pursuant to the GDPR, you are entitled:

- to withdraw consent to the processing of personal data at any time;
- to request, at any time, from TWHE the information on how your personal data is processed;

- to require TWHE to provide you with access to your personal data, to correct or delete such personal data or, as the case may be, to limit processing;
- to object to processing;
- to require data portability;
- to lodge a complaint against the processing of personal data with the Office for Personal Data Protection.

You may exercise your rights laid down by the GDPR with TWHE using the following contact details:

- e-mail: podatelna@acc.cz
- telephone number: +420 379792011
- address: Trans World Hotels & Entertainment, a.s., Česká Kubice 64, 345 32 Česká Kubice

7. FINAL PROVISIONS

This information on the processing of personal data has been processed to provide information on the purpose, manner and legal reasons of the processing of personal data provided by TWHE hotel visitors and on the rights of such data subjects. It is available at the Savannah Hotel's reception, in all rooms at the Savannah Hotel, as well as online at [www.hotel-savannah.cz].

This information on the processing of personal data becomes effective on 25 May 2018.