



Privacy Policy Radisson Blu Hotel & Residences, Zakopane

Updated: 2019-08-28

Scope

This policy defines how POLONIA TATRY Sp. z o.o. collects, uses, consults or otherwise processes personal data of individuals in the context of hotel and catering services provided, organized meetings or events, marketing activities, loyalty programs, as well as supply and purchase services, personnel and employee policy (hereinafter referred to as "**Service**").

The privacy policy describes your data protection rights, including the right to oppose some of the processing operations we perform.

The expression "we" refers to the company POLONIA TATRY Sp. z o.o., based on Jamesa Gordona Bennetta 12, 02-159 Warszawa, Vat no. 5252191410, registered in District Court for Warszawa, KRS 0000181925 and with office located in Radisson Blu Hotel, Bulwary Słowackiego 1, 34-500 Zakopane, email: dataprivacy.zakopane@radissonblu.com.

We will process your personal data as a data controller.

For purposes of this policy, the expression "**General Data Protection Regulations**" means REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (referred to as hereinafter "**GDPR**"), as well as laws and/or regulations implementing the GDPR or issued on the basis of the GDPR, regulations on the protection of privacy and electronic communications or regulations that change, replace, re-issue or consolidate any of the above regulations, as well as all applicable national laws on the processing of personal data and privacy.

Definitions

For the purposes of this policy, the terms "controller", "processor", "third party", "supervisory authority", "personal data", "processing", "data subject" have the meaning as defined in applicable laws on data protection:

1. **Controller**: means any natural or legal person, public body, unit or other entity that independently or jointly with others sets the purposes and means of processing personal data; if the purposes and means of such processing are set out in Union law or in the law of a Member State, the controller may be designated or specific criteria may be laid down in Union or Member State law;
2. **Processing entity**: means any natural or legal person, public authority, unit or other entity that processes personal data on behalf of the controller;
3. **Supervisory authority**: has the meaning set out in the GDPR, i.e. "an independent public authority set up by a Member State in accordance with Article 51";
4. **Personal data**: means information about an identified or identifiable individual; an identifiable natural person is a person who can be directly or indirectly identified, in particular on the basis of an identifier such as name, identification number, location data, internet identifier or one or more specific factors determining physical, physiological, genetic, psychological the economic, cultural or social identity of a natural person;

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ul. Bulwary Słowackiego 1, 34-500 Zakopane

T: +48 18 532 55 55

info.zakopane@radissonblu.com

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5. **Processing:** means an operation or set of operations performed on personal data or personal data sets in an automated or non-automated manner, such as collecting, recording, organizing, organizing, storing, adapting or modifying, downloading, browsing, using, disclosing by sending, distributing or other types of sharing, matching or combining, limiting, deleting or destroying;
6. **Data subject:** means an identified or identifiable natural person whose personal data is processed;
7. **Data Processing Agreement:** means a contract between a controller and a data processor in accordance with Article 30 GDPR;
8. **Privacy Shield:** means the legal framework of the EU-US Privacy Shield, developed by the US Department of Commerce, the European Commission and the Swiss Administration to provide companies on both sides of the Atlantic with a mechanism to comply with personal data protection requirements in connection with the transfer of personal data from the Union European Union and Switzerland to the United States in support of transatlantic trade;
9. **Standard Contract Clauses:** means sets of standard contractual clauses adopted by the European Commission regarding the transfer of personal data abroad;
10. **Subcontractor for data processing:** means a processor that is engaged by a Processing Entity to perform specific processing operations on behalf of the controller;
11. **Third Party:** means in GDPR "natural or legal person, public body, unit or entity other than the data subject, administrator, processor or persons who - under the authority of the controller or processor - may process personal data ";
12. **EOG:** means the European Economic Area
13. **RHG:** Radisson Hotel Group

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Processed data categories, ground for processing, recipients of data

BOOKING PERSONS AND HOTEL GUESTS			
Purpose: booking process			
In the context of the hotel booking process – whether this takes place online on one of our brand websites, through an online booking channel, via a travel agent, through our call center or directly at the hotel – we process your Personal Data for the purpose of: 1. Enabling you to reserve a room in the hotel of your choice, 2. Verifying the availability of the hotel and to administer the booking, 3. Sending you a booking confirmation, 4. Sending you non-commercial pre-arrival emails. You may unsubscribe from pre-arrival emails at any time by clicking on the unsubscribe link in the emails sent to you.			
Processed data categories	Source of data	Ground for processing	Recipients of data
First name, last name (of all co-guests), email address, date of arrival and departure, telephone number, address, car registration plates, payment card type, number and expiration date, Radisson Rewards membership number, food, accommodation and health preferences (allergies, disabilities, restrictions)	Depending on the booking mechanism used: Directly from you through the online booking form Through the online booking channel you used to make the booking From your travel agent From our call center From the Radisson hotel you made a direct booking with	Ad hoc consent obtained through ordering or booking process Processing is necessary to take steps to enter into and perform a contract.	Other Radisson Hotel Group entities involved IT service providers Gift card platform provider Gift card manufacturer Payment service provider
Purpose: Interrupted or incomplete online booking process			
When you are booking online but for some reason are not able to finalize the booking process, we process your Personal Data for the purpose of enabling you to easily continue the online booking process by sending you an email with a link to the online booking form, which is pre-filled on the basis of the data you had already provided in the form.			
Processed data categories	Source of data	Ground for processing	Recipients of data
First name, last name (of all co-guests), email address, date of arrival and departure, telephone number, address, car registration plates, payment card type, number	Directly from you through the online booking form.	It is in Radisson Hotel Group's legitimate interest as a business to re-market an interrupted or incomplete booking process. In this	Email communications service provider Provider of targeted advertisements

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and expiration date, Radisson Rewards membership number, food, accommodation and health preferences (allergies, disabilities, restrictions)		context, Radisson Hotel Group's business interests prevail over yours.	
Purpose: guest satisfaction surveys			
We may send you guest satisfaction surveys by email during or after your stay to enable us to measure the performance of our hotels. You may unsubscribe from our guest satisfaction survey emails at any time by clicking on the unsubscribe link in the emails sent to you.			
Processed data categories	Source of data	Ground for processing	Recipients of data
Country of residence, date of arrival and departure, email address, first name, last name, nationality, Radisson Rewards membership number, stay details	Depending on the booking mechanism used: Directly from you through the booking form Through the online booking channel you used to make the booking From your travel agent From our call center From the Radisson hotel you made a direct booking with	Processing is necessary to ensure and follow up on the good performance of the contract you have with us.	Other Radisson Hotel Group entities involved Guest satisfaction survey provider
Purpose: service emails analytics			
In the context of service emails, which includes guest satisfaction survey emails and any non-commercial pre-arrival emails concerning your booking, we may process and collect your Personal Data, and notably whether you have opened and actioned a service email, for analytical purposes in order to measure the click-through rate and improve the content of our service emails. You may unsubscribe from our service emails at any time by clicking on the unsubscribe link in the service emails sent to you.			
Processed data categories	Source of data	Ground for processing	Recipients of data

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Email address, email clicking behavior, email opening behavior, first name, last name, Radisson Rewards membership number	From our email analytics service provider	It is in Radisson Hotel Group's legitimate interest as a business to understand the email clicking behavior of its guests in order to determine whether improvements are needed. In this context, Radisson Hotel Group's business interests prevail over yours.	Other Radisson Hotel Group entities involved IT service providers Email analytics service provider
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Purpose: hotel check-in and check-out

When staying at the hotel of your choice, we will collect and process your Personal Data for the purposes of: 1. Registering your arrival and departure at the hotel, 2. Assigning you a key card to your room or allowing you to use your mobile device as a room key, 3. Obtaining a credit card guarantee or hotel deposit to ensure payment of your stay, 4. Managing (and archiving) your hotel registration card, 5. Creating or updating your profile in our hotel management system, 6. Assessing your eligibility for a room upgrade and managing this if applicable, 7. Managing payment of your stay, 8. Establishing, printing or sending an invoice for your stay, 9. Paying a commission to your travel agent (if applicable).

In the event you have booked a room in one of our hotels but do not show up – without cancelling – on the date of arrival communicated, we will process your Personal Data for the purposes of: 1. Cancelling your stay and any other reservation you may have made, 2. Managing, processing and settling any outstanding payment that may be due.

Processed data categories	Source of data	Ground for processing	Recipients of data
First name, last name (of all co-guests), email address, date of arrival and departure, telephone number, address, car registration plates, payment card type, number and expiration date, Radisson Rewards membership number, other reservations (theatre, restaurants, etc.)	Depending on the booking mechanism used: Directly from you through the booking form Through the online booking channel you used to make the booking From your travel agent From our call center From the Radisson hotel you made a direct booking with Directly from you through the hotel registration card	Processing is necessary to perform the contract you have with us.	Other Radisson Hotel Group entities involved IT service providers Your travel agent, if applicable

Purpose: payment process

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To ensure payment for all guests staying in a hotel room, each hotel guest is asked for a credit card or deposit upon arrival. In order to ensure that you do not exceed your credit limit during your stay, we produce a credit limit report multiple times a day for the purposes of verifying whether your credit limit has been exceeded. These credit limit reports may contain your Personal Data. Please note that in limited circumstances these credit limit reports may be subject to one of our internal financial audits, and may therefore be accessed by members of our internal audit department, in order to ensure that our hotels follow the Radisson Hotel Group internal guidelines and policies.

Processed data categories	Source of data	Ground for processing	Recipients of data
Date of arrival and departure, first name, last name, payment card type, number and expiration date	Depending on the booking mechanism used: Directly from you through the booking form Through the online booking channel you used to make the booking From your travel agent From our call center From the Radisson hotel you made a direct booking with Directly from you through the hotel registration card	Processing is necessary to ensure the performance of the contract you have with us.	Other Radisson Hotel Group entities involved IT service providers

Purpose: hotel stay

When you stay in one of our hotels, we endeavor to make your stay as pleasant as possible. This requires processing your Personal Data for the purposes of providing specific services during your hotel stay. These services include: 1. Housekeeping and maintenance, 2. Returning lost or forgotten items to you, 3. Managing your and your co-guests' preferences, such as dietary requirements and pillow preferences, in order to provide you with a better service during your stay with us.

Processed data categories	Source of data	Ground for processing	Recipients of data
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Address, consumption habits, date of arrival and departure, dietary requirements, email address, first name, last name (of all adult co-guests), other preferences, telephone number	Depending on the booking mechanism used: Directly from you through the booking form Through the online booking channel you used to make the booking From your travel agent From our call center From the Radisson hotel you made a direct booking with Directly from you during your stay at the hotel	It is in Radisson Hotel Group's legitimate interest as a business to organize its day-to-day hotel maintenance activities, to personalize the services it provides, and/or to be able to identify the owner of a lost or forgotten item. Taking into account the limited Personal Data processed and shared for such purpose(s), Radisson Hotel Group's business interests prevail over yours. us.	Hotel personnel, including housekeeping, maintenance, front desk, and/or other hotel personnel concerned Other Radisson Hotel Group entities involved IT service providers
Purpose: additional services and facilities			
In many of our hotels you can benefit from additional services and facilities, such as breakfast, room service, minibar, pool, restaurants and bars, spa treatments, laundry services, parking, taxi requests, free Wi-Fi, etc. In the event you make use of additional services or facilities at one of our hotels, your Personal Data may be processed to: 1. Manage the booking and use of such additional hotel services and/or facilities, 2. Administer any advance bookings of additional services and/or facilities to your file, 3. Personalize returning guests' arrival to the hotel and the choice of room amenities and room features, 4. Manage the expenses incurred for such additional services and/or facilities.			
Processed data categories	Source of data	Ground for processing	Recipients of data
Consumption habits, date of arrival and departure, dietary requirements, email address, first name, last name (of all adult co-guests), payment card type, number and expiration date, Radisson Rewards membership number, title	Directly from you through the online booking form Through the online booking channel you used to make the booking From your travel agent From our call center Directly from you through the hotel registration card Directly from you when making your additional service/facility request with the hotel front desk or the concierge	Processing is necessary to take steps with a view to entering into a contract and/or to perform the contract.	Hotel personnel, including front desk, room service, and/or other hotel personnel concerned Other Radisson Hotel Group entities involved IT service providers
Purpose: loyalty program Radisson Rewards			

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Radisson Rewards is a global hotel rewards program applicable throughout the hotels of the Radisson Hotel Group that is available to guests staying in our hotels, and to professional partners irrespective of whether the professional partners stay as guests or book on behalf of others. The Radisson Rewards program is managed by Radisson Hospitality, Inc. The Radisson Rewards program provides you with a number of benefits during your stay at our hotel, and enables you to collect Radisson Rewards points during your stay in our hotels and when purchasing from our selected partners. In such context, we may process your Personal Data in order to be able to: 1. Create your online Radisson Rewards profile, including sending you an activation link by email, 2. Provide you with information on your Radisson Rewards points, 3. Register your bookings and award points to your membership card, 4. Inform you about your rewards once you reach a certain points level, 5. Inform you about any changes to the Radisson Rewards program.

Processed data categories	Source of data	Ground for processing	Recipients of data
First name, last name, hotel stay details, Radisson Rewards membership number, booking details, email address, title, address, telephone number, country of residence, language preference	Directly from you when signing up to Radisson Rewards or claiming or redeeming Radisson Rewards points	Processing is necessary to take steps at your request with a view to perform the contract you have with us.	Other Radisson Hotel Group entities involved IT service providers Relevant partner company

Purpose: other loyalty programs

Apart from Radisson Rewards, we also offer our guests the possibility to earn miles or points in loyalty programs of our partners, such as frequent flyer programs, car rental programs and railway programs. In such context, we may process your Personal Data in order to be able to: 1. Award miles or points to your membership account with one of our recognized partners following your stay at our hotel, 2. Assess and fulfil your request to redeem your miles or points of our recognized partners' loyalty programs at our hotel.

Processed data categories	Source of data	Ground for processing	Recipients of data
First name, last name, hotel stay details, membership number of loyalty program of relevant partner company	Directly from you when claiming or redeeming miles or points	Processing is necessary to take steps at your request with a view to perform the contract you have with us as well as to perform the contract you have with our recognized partner(s).	Other Radisson Hotel Group entities involved IT service providers Relevant partner company

Purpose: redemption

We provide you with the opportunity to redeem your loyalty points for items such as gift cards, partner offers or charities. When you make a redemption, we process your and, if applicable, the gift card recipient's Personal Data for the purpose of managing and successfully completing your redemption. In cases where you purchase a gift card for another person, we will process additional Personal Data for the purpose of delivering the gift card to the recipient by email or by post.

Processed data categories	Source of data	Ground for processing	Recipients of data
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<p>First name, last name, payment card type, number and expiration date, your address, telephone number, connection logs, email address and IP address</p> <p>If you purchase a gift card for someone else and depending on the mode of delivery, we will also process the address of the recipient, email address of the recipient, first name, last name of the recipient, telephone number of the recipient</p>	<p>Directly from you when redeeming your points at the hotel or online</p>	<p>Processing is necessary for the performance of the contract you have with us.</p>	<p>Other Radisson Hotel Group entities involved</p> <p>IT service providers</p> <p>Gift card platform provider</p> <p>Payment service provider</p> <p>IT service providers involved in the (online) booking process</p>
<p>Purpose: purchasing a gift card</p> <p>When you purchase a gift card at one of our hotels or online, we process your and, if applicable, the gift card recipient's Personal Data for the purposes of managing and successfully completing your purchase of the gift card. If you are purchasing the gift card for another person, we will process additional Personal Data for the purpose of delivering the gift card to the recipient by email or by post.</p>			
<p>Processed data categories</p> <p>First name, last name, payment card type, number and expiration date If a gift card is purchased online, in addition to the above, we will process your address, connection logs, email address and IP address.</p> <p>If you purchase the gift card for someone else and depending on the mode of delivery, we will also process the address of the recipient, email address of the recipient, first name, last name of the recipient, telephone number of the recipient</p>	<p>Source of data</p> <p>Directly from you when purchasing the gift card at the hotel or online</p>	<p>Ground for processing</p> <p>Processing is necessary to take steps at your request with a view to enter into and perform a contract.</p>	<p>Recipients of data</p> <p>Other Radisson Hotel Group entities involved</p> <p>IT service providers</p> <p>Gift card platform provider</p> <p>Gift card manufacturer</p> <p>Payment service provider</p>
<p>Purpose: registering your gift card</p> <p>As a recipient of one of our gift cards, you may choose to register your gift card online in order to protect the remaining value on the card in case it is lost or stolen. Should you decide to register your gift card, we will process your Personal Data for the purpose of processing such registration.</p>			

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Processed data categories	Source of data	Ground for processing	Recipients of data
Address, date of birth, email address, first name, last name, telephone number, title	Directly from you during the online registration of the gift card	Ad hoc consent obtained during the registration of the gift card	Other Radisson Hotel Group entities involved IT service providers Gift card platform provider
Purpose: newsletters and marketing communications			
<p>If you have explicitly consented to receive our newsletters or marketing communications, including in relation to Radisson Rewards, we may, from time to time, contact you with information about our services and latest offers and process your Personal Data for this purpose.</p> <p>If you no longer want to receive our newsletters or marketing communications, please let us know by sending us an email at privacyquestion@radissonhotels.com. You can also unsubscribe from our marketing emails by clicking on the unsubscribe link in the emails sent to you. For Radisson Rewards, you may also unsubscribe by updating your profile.</p>			
Processed data categories	Source of data	Ground for processing	Recipients of data
Address, date of birth, email address, first name, last name, gender, hobbies and interests, telephone number, hotel stay history, country of residence	Directly from you when subscribing to our newsletter or later when completing your account	Ad hoc consent obtained during the subscription to our newsletter	Other Radisson Hotel Group entities involved IT service providers Email communications service provider
Purpose: newsletters and marketing communications – analytics			
<p>In the context of our newsletters and marketing communications, we may also process and collect your Personal Data, and notably whether you have opened and interacted with one of our communications, for analytical purposes in order to measure the click-through rate and improve the content of our newsletters and marketing communications.</p>			
Processed data categories	Source of data	Ground for processing	Recipients of data
Email address, email clicking behavior, email opening behavior, first name, last name, Radisson Rewards membership number	From our email analytics service provider	It is in Radisson Hotel Group's legitimate interest as a business to understand the click-through rate of its emails in order to determine whether improvements are needed. In this context, Radisson Hotel Group's business interests prevail over yours.	Other Radisson Hotel Group entities involved IT service providers Email analytics service provider
Purpose: mobile applications			

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ul. Bulwary Słowackiego 1, 34-500 Zakopane

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We offer mobile applications (for all hotel brands in the Radisson Hotels Group group) for booking, planning and ensuring a good stay, which can be downloaded from the Apple App Store or Google Play Store.

Depending on the use of mobile applications, personal data may be used to: 1. Book a room in a hotel, 2. Check in online, 3. Manage room service orders, 4. Make reservations at local restaurants, 5. Provide services such as wake-up calls, late check-out, turn down service, 6. Conference booking, 7. Online check-out and obtaining reviews about your stay, 8. Execution of orders by applications, chats, 9. Verification of the number of collected loyalty points.

To protect your real-time location, please turn off the location service. If you do not want to receive messages via mobile applications, please also disable them in the application settings.

Processed data categories	Source of data	Ground for processing	Recipients of data
Email address, first name, last name, location data, stay details, telephone number	Directly from you when downloading our application(s) or when interacting with the application(s)	Ad hoc consent obtained during the installation of the application or in the context of your use of the application	The Radisson hotel of your choice Other Radisson Hotel Group entities involved Mobile applications provider Cloud and hosting service providers

Purpose: website forms

Should you have a particular query or feedback, including the exercise of one of your rights under the GDPR, you may contact us through the contact forms available on our website(s). In such context, we may process your Personal Data for the purposes of handling and providing an answer to your query or request or to follow up on your feedback. We also provide other forms on our websites which may assist you in requesting a particular service from us, such as the best online rate guarantee form.

Processed data categories	Source of data	Ground for processing	Recipients of data
Address, email address, first name, last name, Radisson Rewards membership number, stay details, telephone number and any other data you may decide to share with us in open comment boxes.	Directly from you through the form	Ad hoc consent obtained through the contact form	Other Radisson Hotel Group entities involved IT service providers

Purpose: meetings and events organization and feedback

If you wish to organize a meeting or event in one of our hotels or if you would like more information on this possibility, you can reach out to us by filling in the Request a Proposal form or dedicated contact form on our website(s), by interacting with the online meetings and events chatbot, by directly contacting the hotel of your choice or by contacting us by other means. The Personal Data collected will be processed for the purposes of fulfilling your request to organize a meeting or event.

We may also send you meeting satisfaction surveys after your meeting or event to enable us to measure the performance of our hotels as meeting venues.

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Address, date of meeting or event, email address, first name, last name, profession and employment, Radisson Rewards membership number, telephone number	Directly from you through the online Request a Proposal form the online contact form the meetings and events chatbot a request communicated by other means	Depending on whether you contract directly with us or on behalf of your company: <i>Processing is necessary to take steps at your request with a view to entering into and to perform a contract. It is in Radisson Hotel Group's legitimate interest as a business to have a lead contact person at the company organizing a meeting or event and providing feedback on that meeting or event. In this context, Radisson Hotel Group's business interests prevail over yours.</i>	The hotel of your choice Other Radisson Hotel Group entities involved IT service providers Online chatbot service provider Meeting satisfaction survey provider
Purpose: meetings and events marketing communications			
If you have opted in to receive commercial communications in the context of the organization of a meeting or event, we will also process your data to contact you with information about our services and latest offers.			
Processed data categories	Source of data	Ground for processing	Recipients of data
Address, email address, first name, last name, profession and employment, telephone number	Directly from you through the online Request a Proposal form the online contact form the meetings and events chatbot a request communicated by other means	<i>Ad hoc consent obtained through the Request a Proposal form online the contact form the meetings and events chatbot</i>	Other Radisson Hotel Group entities involved IT service providers Online chatbot service provider Email communications service provider
Purpose: meetings and events marketing communications analytics			
In the context of our marketing communications concerning meetings and events, we may also process and collect your Personal Data, and notably whether you have opened and interacted with one of our communications, for analytical purposes in order to measure the click-through rate and improve the content of our marketing communications.			
Processed data categories	Source of data	Ground for processing	Recipients of data

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Email address, email clicking behavior, email opening behavior, first name, last name, profession and employment, Radisson Rewards membership number	From our email analytics service provider	It is in Radisson Hotel Group's legitimate interest as a business to understand the click-through rate of its emails in order to determine whether improvements are needed. In this context, Radisson Hotel Group's business interests prevail over yours.	Other Radisson Hotel Group entities involved IT service providers Email analytics service provider
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Purpose: analytics

We use personal data provided to us to optimize your experience, through marketing, operational efficiency, tailor-made offers in line with your preferences and consumer habits.

Processed data categories	Source of data	Ground for processing	Recipients of data
Hotel stay details, address, bookings (hotel, restaurant, event, theatre, etc.), date of arrival and departure, title, first name, last name (of adult co-guests), email address, telephone number, payment card type, number and expiration date, Radisson Rewards membership number, redemption history	Directly from you when signing up to Radisson Rewards or claiming or redeeming Radisson Rewards points Directly from you through the online booking form Through the online booking channel you used to make the booking From your travel agent From our call center From our email analytics provider Directly from you when making your additional service/facility request with the hotel front desk or the concierge	It is in Radisson Hotel Group's legitimate interest as a business to understand its guests' preferences and consumption habits. In this context, Radisson Hotel Group's business interests prevail over yours.	Other Radisson Hotel Group entities involved IT service providers Analytics service provider

Purpose: social media and online reviews

Managing social platforms is: everyday activities (publishing), management of interaction with guests and answering queries (guests), implementation of advertising campaigns using social media platforms.

Processed data categories	Source of data	Ground for processing	Recipients of data
Any Personal Data you may decide to share with us or published on social media or in other online reviews about us	Directly from you through publicly accessible social media pages, online booking channels or other (review) websites	It is in Radisson Hotel Group's legitimate interest as a business to process the Personal Data you have chosen to address to us or make	Other Radisson Hotel Group entities involved Online reputation monitoring service provider

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	From our online reputation monitoring service provider	publicly available on social media platforms, online booking channels or other (review) websites in order to improve our services and identify business opportunities. In this context, Radisson Hotel Group's business interests prevail over yours.	
Purpose: social media - contests			
From time to time, we may organize a contest on one of our social media pages. If you choose to participate in such contest, we will process your Personal Data for the purpose of organizing and managing the social media contest and picking the winner(s).			
Processed data categories	Source of data	Ground for processing	Recipients of data
This depends on the data fields in the contest concerned, but almost always includes the following categories of data: address, email address, first name, last name, telephone number	Directly from you through our social media pages	Processing is necessary to take steps to enter into and perform a contract as you accept the terms and conditions of the contest.	Other Radisson Hotel Group entities involved IT service provider
SUPPLIERS OF GOODS AND SERVICES			
Purpose: purchasing process of goods and services			
If you are our current contractor, with whom we cooperate in terms of purchases and deliveries or you are interested in undertaking such cooperation or have received an inquiry from us, in this case we process your personal data in order to complete and finalize the purchase or delivery process.			
Processed data categories	Source of data	Ground for processing	Recipients of data
First name, last name, address, telephone number, email address, payment details, location	Directly from suppliers Data from contracts and agreements Data obtained from Internet and public company databases	Processing is necessary to take steps to enter into and perform a contract Ad hoc consent obtained through documents and offers received In the legitimate interests of the hotel, which prevail over your personal goals	Other Radisson Hotel Group entities involved IT service providers Email communications service provider

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ul. Bulwary Słowackiego 1, 34-500 Zakopane

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EMPLOYEES AND CONTRACTORS

Purpose: managing tasks within the employee and staff policy

Management and organization of staff training, including management and storage of attendance lists and certificates from courses. Administration and management of work time and staff attendance. Managing personal files using a personnel system. Management of employee goals and assessments. Handling accidents / body injuries at work, including communication with the relevant institutes, creating internal and external documentation, sending information to recipients (hospital / doctor, insurance companies, etc.). Administration and payroll management. Implementation of tasks under the Social Fund. Administration of orders and management over contractors.

Processed data categories	Source of data	Ground for processing	Recipients of data
First name, last name, address, telephone number, email address, family members personal data including salaries, personal files, signed documents, forms, court orders, doctor's certificates, employment history	Data obtained directly from employees and contractors Data obtained from employers Data obtained from the court – court orders	In order to perform the contract between the employee / contractor and us Consent obtained directly from the employee / contractor In the legitimate interests of the hotel, which prevail over the personal goals of employees / contractors	Outsourced companies for HR and payroll, as well as Health and Safety and HACCP Training companies Insurance companies Institutions entitled to handle staff / employee matters Other Radisson Hotel Group entities involved IT service providers Email communications service provider

ALL PERSONS STAYING IN THE AREA OF RADISSON BLU HOTEL ZAKOPANE

Purpose: managing safety and security policy in terms of protection of persons and property

The protection of life and property is one of our priorities, which is why we process your image through the CCTV system, which is located throughout the hotel, in places permitted by law.

Processed data categories	Source of data	Ground for processing	Recipients of data
Appearance	Data obtained directly from you	In the legitimate interests of the hotel, which prevail over your personal goals	Suppliers of CCTV system Security agencies State authorities

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			IT service providers Email communications service provider
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Your rights – people residing in the European Union

After the processing of personal data, the regulations on the protection of personal data grant a number of rights, which you can, in principle, use free of charge, except for the exceptions provided for by law. We have created two email addresses for information, communication and queries: a global email address to the hotel group RHG privacyquestion@radissonhotels.com or a local email address to the data controller dataprivacy.zakopane@radissonblu.com. In particular, you have the following rights:

Right to withdraw consent: Wherever we rely on your consent, you will be able to withdraw that consent at any time you choose and at your own initiative by sending a proper request to: privacyquestion@radissonhotels.com or directly to the Data controller at: dataprivacy.zakopane@radissonblu.com; the withdrawal of consent shall not affect the lawfulness of the collection and processing of data which was carried out prior to its withdrawal.

Right to access and rectify your data: you have the right to access your personal data, to review and rectify it; you have the right to request us to copy information about yourself and review or correct them; if you wish to review or correct information such as your name, e-mail address, password and / or any other preferences - you can do it very simply by sending an e-mail to: dataprivacy.zakopane@radissonblu.com or calling the hotel at +48 12 618 88 88 or sending a letter to the hotel's address; You can also request a copy of your personal data processed in the manner described in this document by sending an email to the above-mentioned address; you have the right to access this information, to view it and, if necessary, to ask for their rectification.

Right to erasure: you have the right to erasure all personal data processed as described in this document, when this data is no longer necessary for the purposes for which it was collected or processed, or you have withdrawn your consent or objected to the processing in accordance with the regulations on the protection of personal data. In order to report the will to erasure the data, please send such information to: privacyquestion@radissonhotels.com or directly to the Data controller at: dataprivacy.zakopane@radissonblu.com.

The right to restriction of processing: in certain circumstances, indicated in the regulations on the protection of personal data, you may request to limit the processing of your personal data or to object to the processing of such data; in both cases, please send such information to email address: privacyquestion@radissonhotels.com or directly to the Data controller at: dataprivacy.zakopane@radissonblu.com.

Right to object to the processing of personal data for direct marketing purposes: if your personal data is processed for direct marketing purposes, you can object to the above processing by sending an email to: privacyquestion@radissonhotels.com or directly to the Data controller at: dataprivacy.zakopane@radissonblu.com.

Right to data portability: if you have transferred your data directly to us and if the processing takes place in an automated manner on the basis of your consent or in order to perform the contract between you and us, you have the right to receive personal data processed in an organized structure, in a commonly used and readable by computer format and to transfer this data to another service provider.

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The above rights may be subject to limitations, for example if the fulfillment of your request would involve the disclosure of another person's data, or if you ask us to remove the information that we are obliged to keep, or we have the overriding legitimate interest in storing this information.

If your application or problem is not resolved, you have the right to lodge a complaint with the appropriate EU personal data protection authority at your place of residence, in the place of work or any other where you suspect an infringement.

Your rights - people residing outside the European Union

Depending on where you are located, you have different rights with respect to your personal data and we will comply with them in accordance with applicable laws and this Privacy Policy.

Privacy rights in California

If you reside in California, you have the right to ask us one time each year if we have shared Personal Data with third parties for their direct marketing purposes. To make a request, please send us an email at privacyquestion@radissonhotels.com or write to us at the address listed below. Indicate in your letter that you are a California resident making a "Shine the Light" inquiry.

Russian Citizens

In accordance with Russian Federal Law "On Personal Data" No. 152-FZ we collect, record, systematize, accumulate, store, update (renew and modify), and extract Personal Data about Russian citizens using databases located in the territory of the Russian Federation. If you indicate that you are a Russian citizen of the Russian Federation, we will process your Personal Data in compliance with this requirement and your profile will be maintained on databases in the Russian Federation. If you do not indicate that you are a citizen of the Russian Federation, we are not able to process and maintain your Personal Data under these requirements and will not be liable for that. You are solely responsible for indicating the country of your citizenship. Information containing Personal Data of Russian citizens may be transmitted from the Russian Federation to countries that ensure an adequate level of protection for Personal Data, including member states of the European Union and other countries which Russian law recognizes as ensuring adequate to protection, and also to other countries that may not ensure adequate level of protection for Personal Data. By submitting information to us on our sites and apps, submitting forms to us, or registering on our sites, programs and apps, or making reservations, you grant us consent to process your Personal Data.

Security measures

Appropriate technical and organizational measures are implemented to ensure an adequate level of security of your personal data, including:

access to the premises is covered by an access control system,

access to the rooms is controlled by a monitoring system using industrial cameras,

access to the computer's operating system in which personal data are processed is secured by means of the authentication process using the user ID and password,

protection measures against harmful software such as worms, viruses, Trojans,

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measures to determine the access rights to the indicated scope of data as part of the personal data set processed in the IT system have been applied, a mechanism forcing periodic change of access passwords to the system used for data processing has been applied, the mechanism of automatic blocking of access to the IT system used to process personal data was used in case of longer inactivity of the user's work, encryption of portable computers and the use of encrypted data carriers to transfer data in electronic form to protect personal data.

In the event Personal Data is compromised as a result of a Personal Data Breach we will make the necessary notifications, as required under applicable laws.

Privacy policy toward children

We do not knowingly collect or solicit Personal Data from anyone under the age of 18 or knowingly allow such persons to book a room in one of our hotels. In the event we learn that we have collected Personal Data from a child under the age of 18 without verification of parental consent, steps will be taken promptly to remove that information. If you believe that we have or may have information from or about a child under 18 years of age, please contact us at dataprivacy.zakopane@radissonblu.com.

Sharing data with Third Parties

We will share information within the Radisson Hotel Group hotel chain, unless it is legally prohibited. For example, we will share your data to facilitate your booking or to adjust offers to your preferences.

We will share information about you with data processors that provide services on our behalf. For example, we share information with suppliers who send us e-mails and other forms of communication. We also share information with companies that help us run our websites or conduct promotions, as well as with advertisers and advertising networks that help us in marketing and advertising our products and services. Some sellers may be located in a country other than the country where you live. We can also share information with search engine analysts and providers who act on our behalf.

We can share information with our business partners, unless it is prohibited by law. For example, we can share information with third parties that co-finance the promotion. Some of these partners may send you information about products or services via traditional mail or e-mail, if it is legally permitted or based on prior user's consent.

We will share information if we feel that we must act in accordance with the law or protect ourselves, our clients or others. For example, we will share information to respond to a court order or subpoena, or in response to a lawful request from public authorities, including to meet national security or law enforcement requirements. We may also, if required by law, share your data if you are the winner of a lottery or other competition for anyone who asks for a list of winners. We may share information to enforce our Terms and Conditions of Use of the Website or other agreements, as well as to protect the rights of others. We may disclose this information if we are investigating a potential fraud. This may include the scam that we believe has taken place during the promotion.

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We may share the information of the successor to all or part of our business. For example, if a portion of our business or assets is sold, we may disclose your information as part of this transaction. The user has a certain choice in terms of sharing and marketing practices.

Data transfer outside the EEA

As part of providing our services and for the purposes indicated in this policy, your personal data:

will be stored in the EEA and will be transferred outside the EEA only to those countries where the European Commission has stated that they provide an adequate level of protection of personal data and they can be transferred to the United States of America; if the above the transfer takes place, we ensure that it takes place in accordance with this policy and that the necessary safeguards are in place to ensure that the transfer of data to the United States of America takes place to the entity that has joined the EU-US and Swiss-US Privacy Shield Framework, implemented by the US Department of Commerce, such as the Radisson Hotel Group.

If Third Parties process personal data on our behalf in a manner inconsistent with the Privacy Shield principles, we shall be liable for it unless we prove that we are not responsible for the event leading to the damage. In the event of discrepancy between the provisions of the privacy policy and the Privacy Shield Principles, Privacy Shield rules are conclusive. For more information on the Privacy Shield program, and to view our certification, please visit www.privacyshield.gov.

If you have any questions or want to make a complaint about your participation in the EU-US or Switzerland-US Privacy Shield, we encourage you to contact us via the privacyquestion@radissonhotels.com address. With regard to complaints related to the Legal Framework of Privacy, which cannot be dealt directly with us, we have decided to cooperate with the competent data protection authority or the Dispute Settlement Committee established by the European Data Protection Authorities. Please contact us to indicate the appropriate contact details of the data protection authority. As explained in the Privacy Shield Principles, there is the possibility of binding arbitration proceedings to refer to other complaints that have not been resolved in any other way. We are subject to investigative and prosecution jurisdiction of the U.S. Federal Trade Commission (FTC) [Federal Trade Commission of the United States].

The period of data storage

We will keep your personal data only for the period necessary to achieve the objectives set out in this document, unless the law requires the storage of data for a longer period.

Privacy Policy and Third Parties websites

If you click on the link to the Third Party, you will go to a page over which we have no control, and our Privacy Policy will cease to apply. Your browsing and interaction on any other site is subject to the terms of use and privacy and other rules of such a Third Party site.

Please read the Privacy Policy of other websites carefully. We are not responsible for information or content on the websites of Third Parties.

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Changes and modifications to the Privacy Policy

We reserve the right to periodically change and update this Privacy Policy. We will draw your attention to the above changes if they indicate a fundamental change in the processing, either they will be of relevance to the processing or will be of interest to you and will affect your rights regarding the protection of Personal Data.

The privacy policy of the Radisson Hotel Group Hotel Group on websites and mobile devices is posted at: www.radissonblu.com/en/privacy-policy.

Contact

Any questions, applications, comments regarding procedures related to the implementation of this Privacy Policy applied at the Radisson Blu Hotel & Residences Zakopane please direct to the Data controller, i.e. POLONIA TATRY Sp. z o.o. to the address: dataprivacy.zakopane@radissonblu.com.

You can also write to us to Radisson Hotel Group:

Radisson Hospitality, Inc.
Mail Stop 8256 Attn: Privacy
701 Carlson Parkway
Minnetonka, MN 55305
USA

or to:

Radisson Blu Hotel & Residence, Zakopane
Bulwary Słowackiego 1
34-500 Zakopane
Poland

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