

PRIVACY POLICY OF HOTEL RADISSON COLLECTION HOTEL, WARSAW

This policy describes how Nadryst Investments Sp. z o.o. collects, uses, consults or otherwise processes an individual's personal data in the context of use of websites and applications of our hotel, brands or loyalty programs of the Radisson hotel chain, bookings made in our hotel or organization of a meeting or an event, subscription of our newsletter, handling of deliveries of goods and services (hereafter the "**Service**"). This policy includes a description of your data protection rights, including a right to object to some of the processing activities we carry out. The word "we" refers also to Nadryst Investments Sp. z o.o., registered at the District Court for the capital city of Warsaw (KRS no. 0000611031, with its statutory seat at 9 Próźna Street, 00-107 Warsaw, and with its office in the Radisson Collection Hotel, Warsaw, at 24 Grzybowska Street, 00-132 Warsaw, email: dataprivacy.centrum@radissoncollection.com. We will process your personal data as a data controller.

For the purpose of this policy, the following term "**Data Protection Legislation**" shall mean the 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 (the "**GDPR**"), as well as any legislation and/or regulation implementing or created pursuant to the GDPR and the e-Privacy legislation, or which amends, replaces, re-enacts or consolidates any of them, and all other national applicable laws relating to processing of personal data and privacy that may exist under applicable law.

For the purpose of this policy, "controller", "processor", "third party", "supervisory authority", "personal data", "processing", "data subject", shall have the meanings set out in the applicable Data Protection Legislation.

1. "Controller" shall have the meaning under the GDPR, i.e. "the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law".
2. "Processor" shall have the meaning under the GDPR, i.e. "a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller".
3. "Supervisory Authority" shall have the meaning under the GDPR, i.e. "an independent public authority which is established by a Member State pursuant to Article 51" of the GDPR.
4. "Personal Data" shall have the meaning under the GDPR, i.e. "any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".
5. "Processing" shall have the meaning under the GDPR (i.e. "any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction").
6. The data subject means an identified or identifiable natural person whose data is processed.



7. “Data Processing Agreement” means a controller-processor agreement in accordance with Article 30 of the GDPR.
8. “Privacy Shield” means the EU-U.S. Privacy Shield legal framework, designed by the U.S. Department of Commerce and the European Commission and Swiss Administration to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring personal data from the European Union and Switzerland to the United States in support of transatlantic commerce.
9. “Standard Contractual Clauses” means sets of standard contractual clauses for transfers as adopted by the European Commission for the international transfer of personal data.
10. “Subprocessors” means a processor engaged by the Processor to carry out certain processing activities on behalf of the Controller.
11. “Third Party” shall have the meaning under the GDPR, i.e. “a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data”.
12. EEA means the European Economic Area.
13. RHG means the Radisson Hotel Group.

We collect information from and about you.

1. **We collect contact information.** For example, we might collect your name and email address. We may also collect your phone number or mailing address.
2. **We collect travel agent information.** If you are a travel agent and you enroll in our travel agency loyalty program, we will collect your travel agency ID number. For U.S. travel agents who accrue certain point levels, we may also collect your social security number if required by law to do so.
3. **We collect demographic information.** We may collect information such as your gender, age and language preferences.
4. **We collect guest stay and loyalty program information.** For example, we collect information on the hotels where you have stayed, your dates of arrival and departure, goods and services purchased, special requests and service preferences. We collect information on your use of our loyalty programs, including how you earn and redeem points.
5. **We collect payment information.** For example, we may collect your credit card number if you make a reservation online.
6. **We collect business information.** For example, we collect contact and other relevant information about your business if your business enrolls in one of our loyalty programs, or if your employees or agents use a corporate account to do business with us.
7. **We collect information you submit or post.** For example, we collect feedback about our hotels and services that you submit to us. We also collect information if you apply for a job.
8. **We collect other information.** If you use our website, we may collect information about the browser you’re using. We might look at what site you came from, or what site you visit when you leave us. We may collect your precise, real-time location using GPS, cell phone towers, Wi-Fi signals, and/or beacon technology (including Apple’s iBeacon), and/or future technologies. We might look at how often you use an app and where you downloaded it. We collect this information using the tracking



tools described below and in compliance with applicable local law. To control those tools, please read the choices section below.

We collect information in different ways.

1. **We collect information that you give to us.** For example, if you make a reservation online, or enroll in one of our loyalty programs. We also collect information if you contact us or participate in a promotion.
2. **We collect information about you automatically.** Where permitted by law we use tracking tools such as browser cookies and web beacons to collect information from you. We collect information about users over time when you use this website.
3. **We may have third parties collect personal information this way (see below).**
4. **We get information about you from third parties.** Where permitted by law, we may share information among entities within the Group or we may get from other third parties with whom we do business. We may get information from persons acting on your behalf, for example if someone makes a reservation for you. We may also get information from social media platforms and advertising and analytics providers.
5. **We combine information.** For example, we may combine information that we have collected offline with information we collect online, to the extent covered by the transactional purpose or your consent. Or we may combine information we get from a third party with information we already have.

We use information as disclosed and described here, subject to any consent required by applicable law.

1. **We use information to respond to your requests or questions.** For example, we will use your information to provide the services you request, such as to fulfill a request for a hotel reservation, and to send you a pre-arrival email, a post-departure email, or to ask you to participate in a customer survey. Where legally permitted, we may use your personal data to personalize your experience with us. We might use your information to respond to a question about your loyalty account or to fulfill a redemption request. We use social security numbers and tax ID numbers to process tax documents.
2. **We use information to improve our websites and services.** We may use your information to make our hotels, services and loyalty programs better. We might use your information to customize your experience with us. Where legally permitted, we may combine information we get from you with information about you we get from third parties.
3. **We use information to administer our site and for internal operations.** For example, we may aggregate or anonymize your information for analytics, research or other business purposes.
4. **We use information for security purposes.** Where legally permitted, we may use your information to protect our company, our customers, and our websites.
5. **We use information for marketing purposes.** For example, we might send you information about new services and special offers. We might also use your information to serve you ads about our hotels, loyalty programs and offers. We might tell you about new features or updates. These might be third-party offers or products we think you might find interesting. If you register with us, we'll send you our promotional emails. We obtain consents as required by law before marketing to you. To

manage this, read the choices section below. We may also use push notifications on our mobile apps.

6. **We use information to communicate with you about your account or our relationship.** We may contact you about your account or for feedback. We might also contact you about this Privacy Policy or our Site Usage Terms and Conditions.
7. **We use information as otherwise disclosed or permitted by law.**

We may share information with third parties.

1. **We will share information within the Group unless legally prohibited.** For example, we will share your information to facilitate reservations or to customize offers to your preference.
2. **We will share your information with data processors that perform services on our behalf.** For example, we share information with vendors who send emails and other communications for us. We also share information with companies that help us operate our sites or run promotions and advertisers and advertising networks that assist us in marketing and advertising our products and services. Some vendors may be located in a country other than where you live. We may also share information with analytics and search engine providers who act on our behalf.
3. **We may share information with our business partners unless legally prohibited.** For example, we might share information with third parties who co-sponsor a promotion. Some of these partners may send you information about product or services by mail or email where legally permitted or based on your prior consent.
4. **We will share information if we think we have to in order to comply with the law or to protect ourselves, our customers or others.** For example, we will share information to respond to a court order or subpoena, or in response to a lawful request by public authorities, including to meet national security or law enforcement requirements. Or, when required by law, we may share your information if you are the winner of a sweepstakes or other contest with anyone who requests a winner's list. We may share information in order to enforce our Site Usage Terms and Conditions or other agreements, and to protect the rights of others. We might share if we are investigating potential fraud. This might include fraud we think has happened during a promotion.
5. **We may share information with a successor to all or part of our business.** For example, if part of our business or assets are sold, we may disclose user information as part of that transaction. You have certain choices about sharing and marketing practices.

Is your personal data used for direct marketing communications?

If you have explicitly consented, we may, from time to time, contact you with information about our Service. If you no longer want to receive such communications, please let us know by sending an email to us at dataprivacy.centrum@radissoncollection.com. You can also unsubscribe from our marketing emails by clicking on the unsubscribe link in the emails sent to you.

How long is your personal data stored?

We will retain your information only for the period necessary to fulfil the purposes outlined in this Privacy Statement unless a longer retention period is required by law.

Is your personal data transferred outside the EEA?

In the context of the provision of the Service and for the purposes described in this policy, your personal data

1. Will be kept within the EEA and transferred outside the EEA only to a country or countries which have been recognised by the European Commission to provide an adequate level of data protection.
2. Might be transferred to the United States of America

When such transfer happens we ensure that it takes place in accordance with this policy and that the necessary safeguards are put in place to ensure that the transfer to the United States of America is done to an organisation that has adhered to the EU-US and Swiss-US Privacy Shield Framework as implemented by the U.S. Department of Commerce, such as The Radisson Hotel Group.

If Third Parties process personal data on our behalf in a manner inconsistent with the principles of either Privacy Shield framework, we remain liable unless we prove we are not responsible for the event giving rise to the damage. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit www.privacyshield.gov.

If you have a question or complaint related to the participation in the EU-U.S. or Swiss-U.S. Privacy Shield, we encourage you to contact us via dataprivacy.centrum@radissoncollection.com. For any complaints related to the Privacy Shield frameworks that cannot be resolved with us directly, we have chosen to cooperate with the relevant Data Protection Authority, or a panel established by the European DPAs for resolving disputes. Please contact us to be directed to the relevant DPA contacts. As further explained in the Privacy Shield Principles, binding arbitration is available to address residual complaints not resolved by other means. We are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

What rules apply to children?

The Service is not intended for use by anyone under the age of 18. We do not knowingly collect or solicit personal data from anyone under the age of 18 or knowingly allow such persons to register for the Service. 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 of age, please contact us at dataprivacy.centrum@radissoncollection.com.

Does this policy apply to third party websites?

If you click on a link to a third party website, you will be taken to a website we do not control. This policy is only in effect for the Service and not for any third party website and you are subject to the terms of use and privacy and other policies of such third party website. Read the privacy policy of other websites carefully. We are not responsible or liable for the information or content on such third party websites.

Appropriate technical and organisational measures are implemented in order to ensure an appropriate level of security of your personal data.

1. Access to premises is covered by an access control system.
2. Access to premises is controlled by a monitoring system using CCTV cameras.
3. Access to the operating system of the computer in which personal data is processed is secured with an authentication process using a user ID and a password.
4. Protection means are applied to protect against such malware as worms, viruses, and trojans.
5. Means are used that make it possible to define the access rights to a specific range of data within the personal data set processed in the IT system.
6. A mechanism is used that forces periodic change of passwords to the system used to process data.
7. A mechanism is used for automatic block of access to the IT system used to process personal data in the event of longer inactivity of the user.
8. Encryption of portable computers and of data storage devices for carrying data in the electronic form is used in order to protect personal data.

In the event personal information is compromised as a result of a security breach and where the breach is likely to result in a high risk to the rights and freedoms, we will make the necessary notifications, as required under the Data Protection Legislation.

Who processes what personal data about you?

In the context of the Service, your personal data is processed by several organisations, as detailed hereafter. Through the Service, the following organisations process your personal data as data controllers, for their own purposes.

Purpose of data processing	Categories of processed data	Data source	Legal grounds
in order to manage the booking process from the moment a booking is made until the payment	first name, last name, address email address, telephone numbers, postal address, car license plates, credit card details, bank account numbers, food preferences, accommodation preferences, health preferences (allergies), religious preferences, sexual orientation	by way of a booking enquiry (email address, fax no., online booking) or telephone booking orders	consent in the form of written orders (email address, fax no., online booking, or telephone booking orders)

in order to perform sales activities (obtaining data from potential customers, contract/proposal) and after-sale activities	first name, last name, address, and other contact details, information submitted or given by the customer, financial information	directly from the customer, indirectly from other entities that are members of the Group (e.g. other employees, Polish and international sales structures, directly from a database, users/ administrators/ network platforms)	consent of persons, legally justified interests associated with performance of the contracts between you and us
in order to manage the goods and services purchase process;	first name, last name, address, telephone number, and other contact details, information about payments, information submitted or given by you, location data	data from business partners, data in received documents, data from persons, data obtained from the Internet, in databases from IT systems	consent of persons, legally justified interests associated with performance of the contracts between you and us
management and organization of training of personnel, including management and storage of attendance lists and course certificates	first name, last name, address, and other contact details	directly from you by way of use of the service	consent in the form of written orders for performance of the contract between you and us
management of payments (e.g. by guests) - cash, credit card, direct payment to the account, including returns, settlements, card transactions, or handling of credit cards	first name, last name, address, and other contact details, credit card number, bank account number	directly from you by way of use of the service	consents in the form of a written order or a credit card authorization for the performance of a contract between you and us
handling insurance claims (e.g. by guests, employees, third parties) and management of files	first name, last name, address, and other contact details	directly from you by way of use of the service	for the performance of a contract between you and us
booking of the spa and services	first name, last name, address	directly from you	for the performance of a contract

What are your rights?

Once you have provided your personal data, several rights are recognized under the Data Protection Legislation, which you can in principle exercise free of charge, subject to statutory exceptions. In particular, you have the following rights:

- 1. Right to withdraw consent:** if your personal data is processed on the basis of your consent, you have the right to withdraw your consent at any time you choose and on your own initiative. You can do so by sending an e-mail with the appropriate request on following e-mail address: dataprivacy.centrum@radissoncollection.com. The withdrawal of your consent will not affect the lawfulness of the collection and processing of your data based on your consent up until the moment where you withdraw your consent.

- 2. Right to access, review, and rectify your data:** you have the right to access, review, and rectify your personal data. You may be entitled to ask us for a copy of your information, to review or correct it if you wish to review or rectify any information like your name, email address, passwords and/or any other preferences, you can easily do so by: sending an e-mail with the appropriate request on following e-mail address: dataprivacy.centrum@radissoncollection.com, phone contact with the hotel at +48 22 321 88 88 or sending a letter to the hotel address. You may also request a copy of the personal data processed as described herein by sending an email on the above-mentioned email address. You can access and review this information and, if necessary, ask to rectify your information.
- 3. Right to erasure:** you have the right to erasure of all the personal data processed by as described herein in case it is no longer needed for the purposes for which the personal data was initially collected or processed, in accordance with the Data Protection Legislation.
- 4. Right to object or restriction of processing:** under certain circumstances described in the Data Protection Legislation, you may ask for a restriction of processing or object to the processing of your personal data.
- 5. Right to object to processing for direct marketing:** where your personal data is processed for direct marketing purposes, you may object to such processing.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the right to lodge a complaint with an EU data protection authority where you live, work or where you believe a breach may have occurred.

Changes to this policy

We reserve the right to modify and update this privacy policy from time to time. We will bring these changes to your attention should they be indicative of a fundamental change to the processing or be relevant to the nature of the processing or be relevant to you and impact your data protection rights.

The privacy policy of the Radisson Hotel Group concerning websites and mobile devices can be viewed at www.radissonblu.com/en/privacy-policy.