

PRIVACY POLICY

of Apart-Hotels-Sofia, AHS

This Policy has been prepared in accordance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the Regulation).

In connection with the provision of its services, Apart-hotel Sofia (AHS) processes as an Administrator the personal data of its clients - individuals, as well as the personal data of other individuals specified below, in accordance with the rules and principles set out in this Policy.

Administrator details:

"VITOSHA TRADE-S" EOOD, UIC: 175161207, registered office and registered office address: Sofia, p.k. 1504, Sredets district, ul. Krakra № 19A

Contact person for personal data issues: Nikolina Stoycheva, tel. 0884 852 703, e-mail: nikolina@ahs.bg

INFORMATION ON PROCESSED PERSONAL DATA

I. What data do we process when you visit our website?

1. When filling out the contact form:

- Name
- E-mail address
- Phone number

2. Automatically collected data when you visit www.ahs.bg

- IP address and data from server log files. This data is not combined and used for user analysis.

When you visit the web page, the web server automatically recognizes and collects your IP address, which is assigned by your Internet service provider, and does not identify you personally. This data is recorded in the server Log Files.

They contain a set of system information about the user: IP address; ISP (Internet Service Provider); the browser you use when visiting a group site (such as Google Chrome, Internet Explorer and Mozilla Firefox); The data collected in this way are only statistical and anonymous and cannot be easily linked to a specific individual since pseudonymization of the data is applied – a unique user number is automatically generated.

II. What data do we process when we provide you with accommodation services?

When we accommodate our guests, we collect the following data for individual clients or individual representatives of legal entities clients:

- Identification data from an identity document: names, personal identification number or other national identification number, date of birth, nationality, identity document number, date and issuing authority, validity;
- Contact data: telephone, email, address;

- Accommodation data: type, duration and dates of accommodation, services used;
- Data related to payments and invoicing: payment method (cash, bank transfer, credit card), payments due and made, bank information (bank, IBAN, bank account holder), bank card data, personal identification number for individuals;

*Refusal to provide data and documents specified in this category may be an obstacle to the provision of the service.

If you use the "Online Self Check-In" service, you can also provide your identification data from your identity document via our website. This method of providing data is not mandatory, but is an additional option that you can use if you wish, in case your arrival time is outside the Reception opening hours. The website provides encryption of the information you send.

III. Video surveillance on the territory of the hotel

In order to ensure physical security against encroachments and to protect the life and health of citizens, a video surveillance system is in operation on the territory of the hotel, performing 24-hour video surveillance and consisting of recording and storage devices. Video surveillance is carried out only in publicly accessible areas and premises and in those for which a special access regime is provided. Video surveillance is not carried out in guest rooms, sanitary and hygienic premises, recreation rooms, etc. etc. Through information boards placed in a visible place, Data Subjects and other visitors who may be filmed are notified of the use of technical means of surveillance and control and of any other relevant information in connection with the surveillance.

ON WHAT BASIS DO WE PROCESS PERSONAL DATA?

1. For the data you fill in in the contact form, we need your explicit consent, without which you cannot send the entered information;
2. For automatically collected data - IP address and server log file data (date and time of access, name and address (URL) of the retrieved file, website from which access is made (URL of referring site), browser used and, if applicable, the operating system of the computer, as well as the name of the Internet connection provider) - Art. 6, para. 1, f) of the GDPR, which allows the processing of personal data for the purpose of legitimate interest - protection against unlawful use. These data are not combined and used for user analysis.
3. When we provide you with accommodation services, including at the "reservation" stage, we process your data on the basis of the hotel service contract concluded between us or to take steps at your request before concluding a contract and on the basis of legal requirements for the provision of the services subject to the contract.
4. Video surveillance on the hotel territory is carried out on the basis of our legitimate interest in ensuring the security of the hotel territory, preventing and detecting incidents, as well as protecting the life and health of citizens.

FOR WHAT PURPOSE DO WE PROCESS THE DATA?

1. for the data you fill in in the contact form: in order to be able to respond to your inquiry and identify who it originates from.
2. For automatically collected data - for the purpose of maintaining and administering the website, detecting and preventing fraud and unauthorized access to the system and to ensure the security of the Administrator's systems.

3. When we provide accommodation services:

- in order to individualize our clients, as a party to the service contract;
- in order to accept, administer and process reservations;
- when required by the circumstances – in order to establish, exercise or defend legal claims;
- in order to comply with the legal requirements for the provision of hotel services (keeping a register of accommodated tourists, in accordance with the Tourism Act, withholding and paying tourist tax, handling signals, complaints, requests for exercising consumer rights and the like, accounting and tax treatment of payments, etc.)
- in order to control, analyze and optimize business processes to improve the quality of services
- in case you have given us your explicit consent to this, the storage of your email address may also be for the purpose of sending information from our periodic bulletin/newsletter, with current services, promotional packages, prices, events, special offers, updates, etc. similar.

4. When we carry out video surveillance – in order to ensure the security of the hotel premises, the prevention and detection of incidents, as well as to protect the life and health of citizens.

HOW DO WE OBTAIN PERSONAL DATA?

In most cases, your personal data is provided directly by you.

In other cases, another person to whom you have already provided your data may make a reservation on your behalf – e.g. your representative, event organizers, etc.

Additionally, your data may reach us through business partners to whom you have provided your data, with consent to make the reservation on your behalf (e.g. booking sites such as booking.com, Airbnb.com, etc.; travel agents, tour operators, other persons who provide intermediary services when making reservations or when requesting other services, and the like) – these persons are in the position of “Joint personal data controllers” with Apart hotel Sofia and bear their own responsibility for their own role in data processing. You can find their privacy policy on their websites;

AUTOMATED DECISION MAKING

No automated decision-making, including profiling, is carried out based on your data.

“Profiling” means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning the performance of that natural person’s professional duties, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

DIRECT MARKETING

If you have given us your explicit consent to this, when providing your email address, we may send you a periodic newsletter with current offers/promotions, prices and conditions of the services we offer. You can opt out of this option at any time by following the link in the letter you received at your email address.

TO WHOM DO WE PROVIDE YOUR DATA?

We do not disclose personal data to third parties, except in cases where:

- this is necessary to fulfill our legal obligation - to state authorities, e.g. Ministry of Tourism, National Revenue Agency, etc.;
- this is necessary to provide our services - to banks and payment service providers, postal and courier service providers, business partners such as: booking sites; travel agencies and other providers of tourist or other auxiliary services such as rental cars, taxi and other transport services and the like;
- this is permissible, subject to legal requirements - to personal data processors who carry out the processing on our behalf;
- we have received your explicit consent for this - to the persons provided for in the relevant consent;
- this is necessary to protect our rights or legitimate interests or those of other persons: state, municipal and judicial authorities, private and state bailiffs, lawyers, notaries, etc.
- in other cases provided for by law.

STORAGE PERIOD

The data provided by you in the contact form are stored for the period necessary for their processing, but not more than 1 year; In case you have subscribed to our newsletter and if there is no other reason to store your e-mail address, we will delete it immediately after you have submitted a refusal to receive it in the future.

When you have made a reservation and/or have been a hotel customer, your data is stored for a period of 5 years, starting from the termination of the service.

The recordings from the video surveillance systems are stored for a period of up to 30 days from the date of recording.

WHAT ARE YOUR RIGHTS IN RELATION TO PERSONAL DATA?

1. Right to access the personal data relating to you – you can request information about how we use your data and to be provided with a copy of the information about you that we store.
2. Right to correct the data – e.g. submitted inaccurately, incompletely or changed after sending the initial information.
3. Right to delete the personal data relating to you (“right to be forgotten”)
4. Right to restrict the processing of personal data relating to you.
5. The right to receive the personal data you have provided to us and which concern you and to reuse them by transferring them to another controller (“right to portability”).
6. Right, at any time and on grounds relating to your particular situation, to object to the processing of personal data concerning you.
7. Right to lodge a complaint with a supervisory authority if your rights have been violated or you have been harmed by unlawful processing of your personal data (the supervisory authority for personal data protection in the Republic of Bulgaria is the Personal Data Protection Commission, with address 2 Tsvetan Lazarov Blvd., Sofia, PO Box 1592).

The exercise of your rights described above is free of charge. Only in the event that the requests are manifestly unfounded or excessive, in particular due to their repetition, the Administrator reserves the right:

- to charge a reasonable fee, taking into account the administrative costs of providing the information or communication or taking the requested action, or
- to refuse to take action on the request.