



HOTEL N

BEOGRAD

**napred-
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RULEBOOK ON PERSONAL DATA PROTECTION

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NAPRED-UGOSTITELJSTVO D.O.O

RULEBOOK ON PERSONAL DATA PROTECTION

NAPRED-UGOSTITELJSTVO D.O.O

NAPRED-UGOSTITELJSTVO D.O.O. based in Belgrade , Bilećka 57, PIB: 100164467, in Hotel „N“ Belgrade, protects privacy of any person whose personal data is collected. We let You know which personal data and in which purposes hotel collects them, inform you about Your rights and ways we protect them.

Data Processing and Rule of Law

NAPRED-UGOSTITELJSTVO D.O.O, in operating and processing Your data, respects Your privacy and obliges to protect Your personal data. Collecting and keeping data is carried out in accordance with Law on personal data protection – Zakon o zaštiti podataka o ličnosti ("Sl. glasnik RS", br. 87/2018).

Application of data protection principles

NAPRED-UGOSTITELJSTVO D.O.O. follows principles when collecting data:

- Processing will be possible if it is allowed by Law, and done within boundaries of Law,
- Respondents are able to get quick and simple achievement of their rights (specific information are limited only when it is demanded by Law, or when it is necessary for protection of third parties), - We inform users about processing their personal data,
- We process personal data only for purposes that are intended for,
- We keep data in form that enables identification of person as long as it is necessary for purposes that personal data is intended for, and keep it longer only if it is allowed by Law,
- We process data if it is appropriate, relevant and limited to what is necessary. Special care is taken not to collect data which has no justified need for processing,
- We take care about accuracy and correctness of data and erase incorrect data as much as it is possible.

Some third parties have access to personal data of our guests, in need and in limited extent - indirect intermediates of processing (for example, our business associates that provide IT or other services), which keep them in databases until the end of need. Those parties sign detailed contracts about their permissions and obligations in operations related to personal data in accordance with the Law.

Purposes of data collection

Some of Your personal data NAPRED-UGOSTITELJSTVO D.O.O. collects because it is necessary for fulfilling of contracts related to accommodation services and because of regulations related to hospitality business, but some other or the same data can be collected for other purposes primarily for contacts, in order to:

- fulfill accommodation services deals
- fulfill requirements of the Law and other legal boundaries that include hospitality industry
- meet direct marketing purposes
- send offers
- improve and personalize services to You as guests
- protect property and security of individuals using video monitoring system
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NAPRED-UGOSTITELJSTVO D.O.O. guarantees that collected data will only be used in purposes mentioned above.

NAPRED-UGOSTITELJSTVO D.O.O. can use unpersonalised data for statistics.

Rule of Law on collecting protected personal data

Basis on which above mentioned purposes are collected is:

- legal,
- contractual,
- in key interest of respondents,
- in legitimate interest that is more powerful of respondents interest or
- respondents consent depending on purpose of processing and type of personal data.

When data is collected

NAPRED-UGOSTITELJSTVO D.O.O. collects your data:

- during accommodation reservation (on web, by phone or e-mail)
- at hotel's reception desk during reservation or registration
- when making reservation of other hospitality services
- on premises locations covered by video monitoring system

Time frame of data keeping

Personal data that NAPRED-UGOSTITELJSTVO D.O.O. collects in accordance with Law, has to keep it as much time as Laws order.

Personal data that NAPRED-UGOSTITELJSTVO D.O.O. collects in terms of contractual relationship will be kept only as much as it is needed for purpose of fulfillment of contract and for providing a service.

Rights of respondents

Regardless on which basis is data collected for, at any time You can ask us to:

- access, change or make addition to Your personal data,
- erase Your personal data in each database we kept it in,
- limit operation with Your data or file a complaint on data processing,
- transfer collected personal data to You or third parties, in accordance with allowed legal regulations
- if personal data is given based on Your consent, You can always withdraw consent without any negative consequences,
- give right to complaint to competent authorities – Commissioner for Information of Public Importance and Personal Data Protection.

Please send Your written request to our company's person in charge of personal data protection: Dragana Čitaković or mail it to address of NAPRED-UGOSTITELJSTVO D.O.O., Bilećka 57, 11000 Belgrade, Republic of Serbia.

Personal Data collected from people who made reservation for guests accommodation

You must deliver Your personal data in order to get services of accommodation, NAPRED-UGOSTITELJSTVO D.O.O. as an operator and processor keeps it in its database primarily for fulfillment of contract related to accommodation and following legal obligations, and other regulations related to hospitality industry, and is able to use them in other purposes that are intended to follow active regulations. If You do not give NAPRED-UGOSTITELJSTVO D.O.O. minimum of data needed for guest registration into authorities registers, NAPRED-UGOSTITELJSTVO D.O.O. will not be able to provide services of accommodation according to contract or according to Law.

Personal data, that NAPRED-UGOSTITELJSTVO D.O.O. recorded during reservation and/or during arrival to hotel, is collected based on Laws and rules that regulate hospitality industry and providing services to guests. This is the data collected (that can be changed if active regulations change):

- name and surname
- home address (only place of stay for foreign guests)
- date and place of birth
- number and type of identification document
- gender
- citizenship
- room number
- arrival and departure date
- border crossing

NAPRED-UGOSTITELJSTVO D.O.O. keeps data listed above in its guests database and sends it to Book of guests system(electronic system for guest check) to competent authorities of Republic of Srbija, and those data is being kept in system permanently.

Besides that, in order to fulfill contractual obligation, NAPRED-UGOSTITELJSTVO D.O.O. collects next information during reservation:

- e-mail
- phone.

Other data that is related to circumstances of Your stay, for example: the way You travel, who do You travel with, your marital status, number of kids, pets, and other interests, can also be collected if they are directly related to providing services of accommodation and it will be erased on Your request after your departure from accommodation facilities.

Besides that, person that makes reservation or guest can give special permission, consent, that all his information, like:

- name,
- surname,
- e-mail,
- date of birth,
- country,
- other personal data

- collected during Your stay (for example cell number, landline phone number, gender, number of kids, marital status, language, pets, interests and activities during stay, way of travel, accommodation preferences, destination preferences and similar),
- other personal information that are collected during web search (cookies) including IP adress,

collects and uses for further profiling of respondents and for contacting and informing them about special and personalized offers, news and events organized by NAPRED-UGOSTITELJSTVO D.O.O. through online channels (e-mail, web, internet promotion). In this case, a person whose personal data is processed has a right to withdraw consent in any moment, including operations made for profiling, in measure that is connected with that direct marketing, regardless of stage of processing, if it is initial or further processing. Withdrawal of consent can be made anytime and it is free, as a right to change and erase data anytime.

Video monitoring system

NAPRED-UGOSTITELJSTVO D.O.O. Handler of processing has legitimate interest to apply measures of video monitoring so it could protect people, property and business, and in corelation to specific working positions and legal duty to install supervision cameras that record employees and all people that move in line of sight of supervision cameras.

NAPRED-UGOSTITELJSTVO D.O.O. knows that video recordings contain personal information of all people moving in line of sight of cameras so it protects them with special care, has security system, accessability and policy of erasing that is regulated by Rule book on information security.

Video recordings are regularly overwritten so are automatically erased after at least 30 days after recording. Exceptionally, video recordings are kept longer if they are a proof in court proceedings under competent State authorities. Excepted video recordings will be kept on special databases with extremely limited access.

In case of court and/or criminal proceedings, NAPRED-UGOSTITELJSTVO D.O.O. can use mentioned video recordings. Third parties can have insight in personal data on video recordings, indirect intermediates of processing, our contractual associates and business partners registered and profesionalised in providing services of protection of people and properties, and which do not use mentioned data independently in any way, but only in purpose of security of monitoring and alarm systems. For accomplishing rights or any other questions related to protection your personal data please contact me on e-mail: office@hotel-n.rs or by post office on our address: NAPRED-UGOSTITELJSTVO D.O.O., Bilećka 57, 11000 Belgrade, Republic of Serbia. We will respond in the shortest term as possible.