

## Conditions for processing personal details

The company Hotel Start s.r.o., Registration Number: 242 78 546, Budečská 796/17, 120 00, Prague 2, Czech Republic. (also “Hotel Start”) as a processor of personal details; the company Hotelpro s.r.o., Registration Number: 256 49 019, with residence in Budečská 17, 120 00 Prague 2, registered in the business register lead by the City court in Prague, section C, insert 57981 (“Hotelpro”), administrator of the following websites <https://www.hotelstart.cz/> a <https://www.smallcharminghotels.com> and company Resmaster Systems s.r.o., Registration Number: 267 59 136, with residence in Budečská 17, 120 00 Prague 2, registered in the business register lead by the City court, section C, insert 91836 („Resmaster“) administrator of the online reservation system and loyalty program Charming Rewards (“Program”) stating that all personal details are considered to be as strictly confidential and are processed by valid legal provision in the area of protection of personal details.

### 1. Basic information

#### 1.1 Webtracking (monitoring on websites)

(a) Regarding the improvement of services and guaranteeing full functionality of our websites, we are collecting and recording specific data and other information (other information does not represent personal details). This data and other information is being used to evaluate the behaviour of the website visitors for the purpose of collecting statistical data. Subsequently, all personal details are processed in their anonymous state.

Hotelpro and Resmaster use services of companies: Google and Seznam (“Providers”) to obtain statistical data. Collected data are linked to the services offered on the website [www.hotelstart.cz](http://www.hotelstart.cz), and are used for optimal adaptation of services for Hotel Start customers.

(b) Tracking technologies are provided by company HotJar Limited with residence in Level 2, St. Julian’s Business Centre, 3, Elia Zammit Street, St. Julian’s STJ 1000, Malta, which works solely with anonymous data.

(c) If you visit our websites - we collect, gather and evaluate useful data through pixels installed on our websites (“tools”). Tools providing connection of our websites with Your web browser which transmits following information about using our websites:

- Type of browser / version of browser (e.g. Internet Explorer, Chrome, Firefox);
- Language of the browser (e.g. Czech, English)
- Operation system used (e.g. Windows XP, Windows 10, iOS);
- Inner resolution of the window of a browser;
- Screen resolution
- Activation of JavaScript;
- Java on|off
- Cookies yes|no
- The density of colors
- Referrer URL (designation for URL from which the website was visited)
- IP address of a user where we guarantee prompt anonymization

- Time data related to the data of time when the website was accessed
- Amount of clicks

Furthermore, there can be also recognized information which is collected from the content of reservation form (text area which is required to be filled in, for example a name of a client. In this case, a recognition of information about whether a required form was filled “in” or “not” is occurring).

## **1.2 Blocking saving of the data during Webtracking**

Webtracking can be blocked in settings of Your internet browser.

## **1.3 The usage of conversion tracking (tracking of conversations)**

(a) Through conversion cookie reservations on website <https://www.resmaster.eu/externalbooking2/256/en/reservation> a monitoring of reservations occurs which were made after opening commercials on our websites of third subject or based on connection through link of Hotel Start placed on our websites of third subject. The purpose of this monitoring is maximum adaptation of commercials of Hotel Start to our clients. Further on, a connection between the links occurs and their evaluation and usage for the purpose of settling. The Conversion cookies does not include personal details and thereby cannot be used for personal identification of a client. The provider of websites of third subject will receive solely data about the total amount of clients who opened the commercials or finished their reservations.

(b) More information to the problematic cookies can be found on point 1.6.

## **1.4 IP address (address of internet protocol)**

(a) IP address is transferred with every send request for web server so that it could know where to send the response. The dynamic IP address will be received by a client from provider of internet connection (“ISP”), from the moment of their connection to the internet. Because of this the ISP can identify specific client to whom it assigned the IP address.

(b) Based on the save IP address on our server, it is possible that we could identify, through further information gathered from ISP, the identity of the user connected to the internet. Because of this fact, Hotel Start and Providers do not save the IP address, based on which it would be possible to identify specific user, permanently. The IP address is used solely for identifying each log-in in our website and also as a mean of protection against computer attacks. Further on, anonymization of the Ip address occurs. Based on the processed anonymization of the IP address, it is not possible from our side to identify a specific individual.

## **1.5 Log-in files**

(a) During every visit to our website [www.hotelstart.cz](http://www.hotelstart.cz), your web browser will send information about Your user data which will be saved to the protocol file, server of logging file. Data transfers which in this way save will include this data: date and time of visit of our website, URL of visited website, IP address, original URL (“referrer”), from which you recognized our website, amount of transferred data and information about user agent send by Your web browser (possibly also type and version of the browser and used operational system).

(b) IP addresses are for evaluation stored solely anonymously.

## **1.6 Cookies**

(a) Within the website we use cookies. Cookies are small text files consisted of short data which can be during Your visit of our website saved into Your computer. Cookies can include solely information which we send to Your computer, and therefore there is no loading of Your personal details occurring. Subsequently, based on usage of files cookies, there is no occurrence of connection with other data, only if You as a client would agree to it.

(b) An approval with usage of cookies is not a condition for visiting our websites. We would like to warn you that usage of online reservation and booking of our services is possible solely when you approve cookies.

(c) Cookies can be in computer saved for different periods of time.

Further information about types of files cookies, their storage and usage can be found in information of Google about administration of files and their storage here: <https://policies.google.com/technologies/managing?hl=en>

(d) Saving files cookies is possible to generally ban in settings of web browser (also it is possible to ban usage of cookies of third parties). However, if a client decides to do so, some functions of our websites can become inaccessible.

## **2. Personal details and their processing**

### **2.1 Personal details and the purpose of their processing**

(a) Below we define what personal details in each category is being processed.

1. Member of loyalty program:

Name, email, log-in details, preferences, date of birth, address

2. Visitor of a website:

Name, address, phone number, email, log-in details if he/she wants to become

a member of the loyalty program, details about credit card, name of owner,

credit card number, due date

(b) Hotel Start and Resmaster process the following categories of personal details which we need in connection with completing a reservation: name and surname, contact address (voluntary), credit card details and email address. If you have additionally created a registration in our Program, a processing of further data may occur which you willingly provide during the registration.

(c) Your email address is used as Your identification (in case registration into the Program and also can be used for every communication. On Your email address will be send a confirmation reservation and information about conditions of the reservation.

(d) Personal details in case you reserve accommodation without registration (without creating a membership in the Program), will be processed for the purpose of finishing reservation and its completion. If you will provide us with Your personal details in connection with the creation of Your membership in the Program, we will use them mainly for administration of Your membership account, how it is written in paragraph 2.2.

(e) Personal details can be also used for marketing purposed (more detail in 2.3. paragraph).

(f) Your personal details will be transferred to third figures or otherwise processed only when it is necessary and within the contract or if you have agreed to it. Within the processing of Your reservation, the hotel will receive required details for completion of Your reservation. This way the gathered details can our providers of services use only for completing work regarding the completion of Your reservation.

Actual list of providers of other services who for certain purpose may obtain some of Your personal details:

Contracting carrier providing hotel with transfers

CS, a.s.

B-payment

Hores Plus

Sova Net

## **2.2 Program Charming Rewards**

(a) During the processing of reservation you can register in the Program Charming Rewards (<https://www.smallcharminghotels.com/cs/charming-rewards/sign-up/>) and create an account which is secured with a password (“membership account”). By creating this membership account, you are gaining direct access to your details.

(b) If you do not wish to start a membership account, you can also finish the reservation without registration, as a client. In that case, only processing of those personal details that are necessary in connection with the completion of Your Reservation will occur.

## **2.3 Newsletter to email (commercial communication)**

(a) If you have signed up for Newsletter (commercial communication) we will send newsletters to Your email.

(b) If in future you will wish not to proceed with the newsletters, you can, whenever you want, without any payment, sign out through a link for signing out which you can find in every newsletter.

(c) If you decide to sign out from the newsletter, we will not further use Your electronic contacts for those purposes.

### **3. Security of personal details and period for storing them**

#### **3.1 Security of personal details**

(a) Your personal details are being transferred to you in a coded format. We use the coding system SSL (secure socket layer). We secure our websites and other systems using technical and organizational precautions against loss or delete of Your personal details, against access of unauthorized individuals to Your personal details, their editing or distributing.

(b) Access to Your account of Program is possible only after entering Your personal password. In this context, we would like to warn you that it is necessary that you do not share Your access details with third person. Hotelpro and Resmaster do not take responsibility for misuse of used passwords.

#### **3.2 Period for storing**

Personal details are processed and stored for a period necessary for gathering all rights and requirements regarding the reservation contract, at least for period for realizing Your reservation and furthermore for period for which Hotel Start is required, as an administrator, store under generally binding legislations or to which You approved for the processing. In other cases, the period of processing follows from the purpose of processing or is stated by the legislations within the authority of protection of personal details.

#### **3.3 The rights of subjects of the details**

(a) If we process Your personal details, you can request a free information about the processing of Your personal details.

(b) If you think that the processing of Your personal details is being done contrary to the protection of Your personal details and legal conditions of protection of personal details, you can demand an explanation, demand that we delete this occurred situation, also you can claim a block of your personal details, editing, adding or disposal of personal details. You also have the right to bring your request to the authority for protection of personal details with residence in Pplk. Sochora 27, 170 00 Prague 7, [www.uoou.cz](http://www.uoou.cz)

(c) Your approval for the processing of personal details can be withdrawn at any time. If you withdraw the approval for the processing of personal details, Your personal details will be deleted. However, this does not include those personal details that Hotelpro needs for fulfilling legal obligations (e.g. completion of already sent reservation) or for the protection of its legitimate interests. The disposal of personal details may also occur in the case that personal details will not be necessary for the purpose monitored for their storage or if the storage of Your personal details will become inaccessible due to other legitimate reasons by the law.

#### **3.4 Contact us**

(a) In the case of any questions, comments and requests about these principles do not hesitate to contact us through email address [gdpr@hotelstart.cz](mailto:gdpr@hotelstart.cz)

(b) Similarly, if you are interested in accessing information about You that we through this website gathered or if you wish to edit, block or delete any of this information.

Contact:

Hotel Start, Bedřichov 17, 543 51, Špindlerův Mlýn, [www.hotelstart.cz](http://www.hotelstart.cz)