Privacy Statement

Dubrovnik Sea Sun Hotels d.o.o., Šipčine 2, 20000 Dubrovnik, OIB: 89769102312 (hereinafter: "DSSH" or "we" or "the Company") greatly values and understands the importance of protecting your privacy and personal data.
We would like to inform you about how we process your personal data, which we collect directly from you or from third parties.
By using any of our products or services and/or accepting this Statement (for example, in the context of registering to use our services), you consent to the collection and use of personal data as described in this Statement. This Statement is subject to changes, and the date of the last modification is indicated in the title of the Statement.

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1. Your rights

If you have any questions regarding this Statement or you want to submit the request for exercising your right to protect your personal data, you can contact our data protection officer via e mail ljudskipotencijali@dssh.hr or by post to the following address:
Dubrovnik Sea Sun Hotels d.o.o., Šipčine 2, 20000 Dubrovnik

Your rights are stated below:

- the right to access to personal data i.e. the right to obtain information about which of your personal data are processed and the details about their processing
- the right to rectification of personal data,
- the right to erasure of personal data,
- the right to restriction of personal data,
- the right to object to processing of your personal data,
- the right not to be subject to the decision based solely on automated processing, including profiling. In this repect we would like to emphasize that we do not apply such decision making process as all decisions are made with human involvement.
- The right to lodge a complaint with a supervisory authority. In Croatia that is Croatian Personal Data Protection Agency, Selska cesta 136, 10 000 Zagreb, e-mail: **azop@azop.hr**

Exercising the above mentioned rights depends on the reason why we process personal data and on what grounds. For example, we cannot erase personal data even if you request so, if required by law to keep them for a certain period.

Upon your request we shall act without delay and inform you about the activities we have undertaken.You can also contact us if you have any further questions related to your personal data processing.

2. Measures to protect your personal data

We are aware how important the protection of your personal data is so we want to justify in all respects the trust you placed in us by choosing our services.

In order to prevent unauthorised access, disclosure, exchange, erasure or any other abuse of your personal data we provide certain technical, organizational and staff – related protection measures. The aim of these measures is to ensure that only those persons who need the information to perform their job tasks have access to that information in electronic or physical form, and to the extent necessary for that purpose. We recognize the importance an individual person has in personal data protection; we provide internal and external trainings to make sure that our employees and other persons we hire are well informed about the legal obligations and internal procedures related to personal data protection. Specific protection measures are detailed in by-laws and procedures we have set out for that purpose.
Depending on technological advances, a regular review of technical protection measures will be carried out so as to adapt to market standards.

Our partners and service providers who we share personal data with are required to assume contractual obligations and to provide the same level of personal data protection that you expect from us. Before choosing a partner, who will perform data processing for us (data processor) we take reasonable measures to ensure they do so in compliance with legal obligations related to personal data protection.

For online transactions, we use reasonable technological measures to protect the personal information that you transmit to us via our site (e.g. when you write a credit card number SSL encryption is used to provide secure transaction). Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure to prevent interception or other illegal use of personal data.

In order to protect your own privacy, do not send the number of credit cards by e-mail or excessive amount of personal data.

We shall not contact you by mobile phone, text-message or email in order to request confidential personal data or credit card details . If you receive such a request, do not reply to it. We shall request credit card details by telephone only when you book your accommodation or promotional package. We kindly ask you to inform our Data Protection Officer (ljudskipotencijali@dssh.hr) about such messages.

3. Users of hotel services

3.1. Why do we collect and process your personal data?

We collect and process your personal data when it is required by law, to provide services you requested, but also when you give consent for processing your personal data for specific purposes which are specified below:

- **communication with you**: when you contact us and require information about our services, our offer or you make complaints about our services, we will process the data you have submitted so that we can contact you later and act as you requested
- **booking of accommodation and other hotel facilities**: when you are interested in accommodation or other services we offer, we collect your data so that we can check the hotel occupancy and to arrange, organize and provide services you requested on time and as agreed (e.g. accommodation, organization of wedding receptions, banquets, conferences, SPA treatments etc)
- **checking in and checking out**: if you use accommodation service in our hotels, it is our legal obligation to collect certain personal data in order to register your arrival
- **providing and charging for hotel services**: during your stay in the hotel we collect data about special requests you have made so that we can provide expected level of hospitality. We also collect data about the services you have used so that we can track your expenses and collect payment e.g. use of a

bar, minibar, a la carte, room service, list of telephone calls, list of the movies watched, use of transport services, excursions, wellness, SPA, equipment hire, babysitting services etc. In order to secure the payment we collect the credit card number.

- **event planning**: in order to fulfill contractual obligations we collect your personal data when you are an event planner. When you participate in or visit the event taking place on our premises, we collect data allowing us to to provide instructions or information about the events.
- **use of the exchange office services at our properties**: only in certain cases when you use money exchange service in our hotels, based on regulations on performance of exchange transactions and prevention of money laundering and financing of terrorist activities we are legally obliged to collect certain information.
- **monitoring and improving the service quality**: Your satisfaction is of utmost importance to us. Questionnaires are provided for you to complete and assess our services and make comments. The completion of such questionnaires and extent to which you decide to provide your personal data is your own decision.
- **gaining benefits:** as agreed with our partners, we offer certain benefits to holders of some cards (e.g. early check-in). To make sure you can use the benefit we need the data about your card type. Likewise, in some cases we may offer benefits to the persons who participate in our programs (discounts for corporate lunches). Membership in such programs is voluntary, and you can express your consent by filling in the membership application form.
- **protection of your security and your property via video surveillance:** some areas in our hotels and surrounding area are under video surveillance and this is indicated by clear video surveillance signs. During your stay in the hotel you may be captured by video camera.

3.2. What kind of personal data do we collect?

We collect only data necessary for the purposes described in this Statement. Depending on the circumstances following data may be included: your contact information, information related to your reservation, stay or visit to the hotel, your preferences, your name, date of birth, gender, identity card number, credit card number, country of birth, citizenship, visa number if you are subject to visa regime, place of entry in the Republic of Croatia, date of arrival to the hotel and date of departure, personal expenses, information about the airline and the vehicle you use to come to our hotel, opinions about our services (if you decide to provide your personal data in the questionnaires), information about promotional program you are part of or our partners ' prize winning competition, information about the events you organize on our premises and the names of the participants of such events, but also other information you decide to provide or that we obtain for the purposes described above. Besides the information about yourself, we may also require the information about the persons who travel with you.

We will not collect information about your health, religious and philosophical beliefs, and other sensitive information unless it is volunteered by you. The purpose of data collection is to provide better service or to meet your special needs and requirements (e.g. provision of disability access, not serving the food you are allergic to etc).

Collection of above mentioned data may be required by law, or when it is necessary to close an agreement and provide services agreed upon. The data may also be collected based on your consent. When collecting is based on your consent we shall clearly indicate that.

3.3. What sources do we use when collecting your personal data?

We may collect your personal data directly from you (via email, telephone, mobile phone, web form, face-to-face communication with you), but also from other persons, e.g. persons that travel with you, tourist agencies, online platforms you make reservations of our hotel services on, event planners in our hotels, credit card providers and other contractual partners. Those partners should act in accordance with applicable laws and regulations related to private data protection.

When you provide personal data of other persons, you make sure that the person whose personal data you have provided is informed about it and accepts the way we use their personal data..

When we do not collect your personal data directly from you but from other persons stated above, we are responsible only for the actions we take related to personal data upon their receipt. We are not responsible and may not be responsible for the actions related to your personal data taken by the persons we receive you data from. Therefore, we kindly ask you to read privacy protection policies related to other persons you give your personal data to.

3.4. Who do we give your personal data to ?

We give your personal data only to those recipients who need them for the above stated purposes, and only to the extent necessary. We make sure that our partners maintain confidentiality of personal data as required by the contract.

For example, when you stay in our hotels it is our legal obligation to register your stay with relevant state authorities.

In order to provide certain services, we cooperate with external partners who offer such services, e.g. transport organization, excursion organization, wellness and SPA, car hire, yacht hire and hire of other equipment, event organization on our premises etc (if appropriate, we can share the data with the guests who participate in such an event). When you want us to provide such a service, we may disclose your personal data to our partners we cooperate with to the extent necessary for them to provide
a service for you (e.g. getting in touch with you, assessing the compliance with travel regulations or being charged special rates). At your request, we can contact external service providers so that you can create your itineraries by choosing a destination, activities and restaurants from the list we customized for you based on your preferences and the data received from third parties.

When you organize the event that takes place on our premises and you require services related to such an event, at your request we can share information about your event with third parties who can send you offers for the services you require (which are usually restricted and include only your name and contact information) or we can give you contact information of our partner so you can contact them
directly.

In our business operations we use various software solutions, and we hire specialized companies for their maintenance, such as software solutions for booking and hotel business management, web page maintenance and provision of secure exchange of credit card numbers and payments. As our partners may have access to your personal data when providing those services, they assume contractual obligations to conform to the highest standards of personal data protection. Personal data are usually stored on the servers in the European Union. The data you exchange via our website (except for the booking via our website) are stored on the server in Germany, and the adequate protection is guaranteed by signing standard contractual clauses between the company that maintains our webpage and their partner in the Germany.

Besides above mentioned cases, your data may be disclosed when required by law, to fulfill the requirements of state authorities we are legally obliged to fulfill in order to protect our rights or the rights of our visitors, employees and public, and to react in emergency.

3.5. How long do we retain your personal data?

Dubrovnik Sea Sun Hotels d.o.o. does not collect, store, or process credit card numbers or payment details on its servers. All online payment transactions are processed through the secure Monri WSPay Payment Gateway, which uses advanced encryption techniques to protect your financial data. Data related to financial transactions and legal invoices (bills) shall be retained for eleven years, which is the minimum period required under applicable local tax and accounting laws. Other general guest data shall be retained for a period of one to five years, depending on statutory requirements.

4. Newsletter, Marketing and Social Media

Newsletter

Via our web page you can sign up for our newsletter, which will keep you informed about the news and special offers. In order to register, you are required to provide your, email address. Upon entering these data in the web-form, verification link will be sent to the email address you indicated, which needs to be confirmed in order to complete the registration process. Your consent is the basis for collecting these data.

The above data will be retained as long as you agree to receive our newsletter. You can terminate your subscription at any moment by clicking the „unsubscribe“ link, in which case we will consider your consent to receive the newsletter withdrawn and will erase your personal data that were collected for that purpose.

Marketing and Social Networks

If you decide to participate in events or offers through social media we sponsor, we will be able to collect certain data from your account in the social media which are compatible with your settings within the social media service certain data from your account in the social media which are compatible with your settings within the social media service. We can enable you to participate in photography contests, for example photographs of your stay in our hotel, which you can share with your contacts on social networks for voting, sharing offers or other promotions.

If you participate in some of the prize winning games or competitions your information can be exchanged with our sponsor or a third party sponsor.

With your consent, we can also use user- generated content (such as photographs) from social media for the purpose of advertising on websites or on our website and applications.

5. Cookies

When you visit and communicate with our websites, we collect other information that cannot be used to identify you in relation with your use of websites, such as the number of visits to our websites, parts of our web page you browse and the length of time you spent on them (“Other data”). Such data are collected and analysed in order to improve our services and make sure that you find our website, our products and services interesting.

We use cookies on our website to give you the most relevant experience by remembering your preferences and repeat visits. By clicking “Accept All” on the website form you consent to the use of ALL the cookies. However, you may visit “Cookie Settings” to provide a controlled consent of how your information is stored and used.

What are cookies?

This Cookie Policy explains what cookies are and how we use them, the types of cookies we use i.e, the information we collect using cookies and how that information is used, and how to manage the cookie settings.

Cookies are small text files that are used to store small pieces of information. They are stored on your device when the website is loaded on your browser. These cookies help us make the website function properly, make

it more secure, provide better user experience, and understand how the website performs and to analyze what works and where it needs improvement.

How do we use cookies?

As most of the online services, our website uses first-party and third-party cookies for several purposes. First-party cookies are mostly necessary for the website to function the right way, and they do not collect any of your personally identifiable data.

The third-party cookies used on our website are mainly for understanding how the website performs, how you interact with our website, keeping our services secure, providing advertisements that are relevant to you, and all in all providing you with a better and improved user experience and help speed up your future interactions with our website.

Types of Cookies we use

Necessary

Necessary cookies are required to enable the basic features of this site, such as providing secure log-in or adjusting your consent preferences. These cookies do not store any personally identifiable data.

Cookie	Duration	Description
wordpress_test_cookie	session	WordPress sets this cookie to determine whether cookies are enabled on the users' browsers

Functional

Functionality cookies help perform certain functionalities such as sharing website content on social media platforms, collecting feedback and other third-party features.

Cookie	Duration	Description
pll_language	1 year	Polylang sets this cookie to remember the language the user selects when returning to the website and get the language information when unavailable in another way.

Analytics

Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics such as the number of visitors, bounce rate, traffic source, etc.

Cookie	Duration	Description

Advertisement

Advertisement cookies are used to provide visitors with customized advertisements based on the pages you visited previously and to analyze the effectiveness of the ad campaigns.

Cookie	Duration	Description

Manage cookie preferences

Cookie Settings

You can change your cookie preferences any time by clicking the *Consent Preferences* button. This will let you revisit the cookie consent banner and change your preferences or withdraw your consent right away.
In addition to this, different browsers provide different methods to block and delete cookies used by websites.

You can change the settings of your browser to block/delete the cookies. Listed below are the links to the support documents on how to manage and delete cookies from the major web browsers.

- **Chrome**: https://support.google.com/accounts/answer/32050
- **Safari**: https://support.apple.com/en-in/guide/safari/sfri11471/mac
- **Firefox**: https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox?redirectslug=delete-cookies-remove-info-websites-stored&redirectlocale=en-US

- **Internet Explorer**: https://support.microsoft.com/en-us/topic/how-to-delete-cookie-files-in-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc

If you are using any other web browser, please visit your browser's official support documents.

6. Links to websites and third party services

Our website may contain links to websites of third parties. Bear in mind that we cannot be held accountable for the data collected, used, maintained, exchanged or published by the third parties. If you offer information on websites of third parties, i.e. use them, the privacy rules and the terms and conditions of use for these websites will apply. We recommend that you read the privacy rules for the websites you visit prior to sharing your personal data.

DSSH can also collaborate with a limited number of Internet service providers in order to allow Internet access to our guests. Your use of Internet services on our premises is subject to terms and conditions of use and privacy rules set by the Internet service provider of the third party. These terms and conditions and rules can be accessed using links on the service registration page or by visiting the website of the Internet service provider.

7. Video surveillance

We use video surveillance on our premises for the following purposes:

- To protect our guests and other individuals who, for whatever reason, find themselves in the area supervised by the Company and to protect their property,
- To supervise the entrance and exit from the premises and to make employees less exposed to the risk of robberies, break- ins, violence, thefts and similar events at work or related to work,
- To protect the Company's property,
- To protect unauthorised entering the Company's premises,
- To reduce risks and increase the protection of people working in money exchange.

We base the application of video surveillance on our legitimate interest in protecting people and property, while in case of money exchange it is our legal obligation to provide video surveillance of the exchange office.

We have introduced strict rules the purpose of which is to make sure that the recordings are automatically erased after 15 days by recording new content over the old one, that video surveillance can be accessed only by those who need it to do their jobs and that the recordings are to be viewed only in case when we find out there is a good reason for it, i.e. fulfilling one of the above stated purposes (and that only with the consent of the authorised person), these being the only recordings to be kept longer, until there is a need for it.

Recordings obtained through video surveillance are not to be delivered to third parties, except in case there is a request or order of the competent state authority (e.g. the police, state attorney, courts, labour inspectorate). They may be used as evidence in court, administrative, arbitral, or other equivalent proceedings, in accordance with current procedural rules applicable in such proceedings. The recordings are not to be transferred abroad.

The video surveillance we use does not belong to intelligent video surveillance systems, it is not connected with other systems, nor shall we use video surveillance for profiling or automated decision making.

8. Business partners

For the purpose of contacting our business partners and suppliers, and related to concluding and executing contracts (i.e. arrangements for delivery of goods and service execution), we gather contact information of our business partners who are natural persons and their employees (e.g. name , number of company

phone/mobile, email address). These data are retained until the termination of business relationship and we do not deliver them to third parties nor we export them to third countries. The data collected are not of personal nature but are related to the completion of work tasks.

9. Job applicants, high school students, college students, scholarship recipients

Job applicants

You can send us your open job application to our email address ljudskipotencijali@dssh.hr or by mail to our address. Providing data is voluntary. Personal data received in this way are processed only for recruitment purposes and are not exported to other countries nor to individuals outside DSSH. The received CVs will be retained no longer than one year and will be erased earlier upon your

In case you have applied for an advertised job and have not been selected, your data will be erased upon the completion of the selection procedure, unless you specifically agree that we retain them longer for possible future employment.

High school students and college students

In accordance with law, we can hire high school students and full-time college students. In these cases it is our obligation to collect the personal data of high school students and college students that are required by law as well as other data required for the execution of the contract. The personal data may be shared with high school and the Student Job Centre through which the students are employed. Personal data of high school students and college students are not exported to other countries. We have legal obligation to retain their data for 6 years after they stop working and then we erase them. Personal data of high school students and college students who have not been hired are erased upon the completion of the selection procedure.

The above is also applied to personal data of high school students who do their apprenticeship in accordance with the curriculum for the organisation and provision of apprenticeship training.

Scholarship recipients

Personal data may be collected for the payment of scholarship to high school students and college students who are being educated for our business interest. The students interested in concluding a scholarship contract may apply for an advertised scholarship by delivering the required data, after which a contract is concluded with the selected candidates. The personal data of the selected candidates are retained no longer than 5 years from the conclusion of the scholarship contract, while the data of the candidates that have not been selected are erased upon the completion of the selection procedure. Your personal data are delivered to the Ministry of Tourism, which subsidises the scholarship. No personal data are exported to other countries.

10. Privacy policy changes

We regularly update the privacy policy so that it is accurate and up-to-date, and we reserve the right to change its content if we deem it necessary. You will be informed about all changes and additions in a timely manner through our website in accordance with the principle of transparency.