



# *Privacy policy*





# STATEMENT ON PROTECTION OF PERSONAL DATA OF THE COMPANY MANAS d.o.o.

This Statement on personal data protection for the company **MANAS doo, 21000 Split, Barakovićeva 18, VAT: HR77290534017 (hereinafter Cornaro Hotel)**, was prepared in accordance with General Regulation (EU) No. 2016/679 of the European Parliament and of the Council of 27 April 2016, which applies from May 25, 2018.

**Cornaro Hotel, 21000 Split, Sinjska 6** will handle your personal data in accordance with General Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and the free movement of such data, the Law on Implementation of the General Regulation personal data (NN 42/2018) or other national law based on the Regulation in question and with the application of appropriate technical and security measures to protect personal data from unauthorized access, misuse, disclosure, loss or destruction.

## 1. General information

This Statement describes what data we collect, how we process it and for what purposes we use it, as well as your rights related to your data.

Cornaro hotel is responsible for data processing:

Contact e-mail address: **voditelj.obrade@manas.hr**

Contact phone: **+385 (0) 21 644 200**

Contact of the Personal Data Protection Officer: **voditelj.obrade@manas.hr**

If we use the services of external providers to process your personal data, it is the processing (of personal data) by order and we are also responsible for the protection of your personal data.

## 2. The types of personal data we process

Cornaro hotel processes your personal data that you have entrusted to us by accessing our official website or by accessing our official profiles on social networks, requesting contact, requesting information about the business of the Processing Manager, expressing remarks or compliments, by submitting applications for a job, by requesting to receive a newsletter and by entering into a business relationship with us.

Personal data collected by sending an e-mail to the e-mail addresses of the Processing Manager or by calling the telephone number of the Processing Manager listed on our official website and your posting on our official social media profiles, based on your contact request, request for information on the business of the Processing Manager, expressing a remark or praise, submitting applications for a job, requesting a newsletter and entering into a business relationship with us are your name, your e-mail address, your phone number, your resume, etc. and all those personal data that you have provided to us on your own initiative.

Personal data collected through the contact form on our official website, and based on your request for information about our services, products or business and the request to enter into a business or contractual relationship with us are your name, e-mail address and number phone.

Personal data collected through the accommodation booking form on our official website or through the guest registration form, and based on your request for booking our services or products or guest registration are your name, address, e-mail address, telephone number and all those data that are necessary in order to make a reservation of the same or for the purpose of performing the contracted services or products.



Personal data collected for the purpose of contacting representatives / owners of business associates and / or clients of legal entities and / or employees of business associates and clients, and for the efficiency of business contracts are the name and surname of the person authorized to represent / owner, ID of the person authorized to represent / owner, address of residence, ie residence of the person authorized to represent / owner, name and surname of employees of business partners - suppliers, position of employees of business associates, place of work of employees of business associates, etc.

Personal data collected for the purpose of providing adequate wellness treatment in relation to the health condition of the service user and prevention of possible injuries of the user and the insurance of the Processing Manager in case of claiming damages by the user are your health data.

Personal data collected for the purpose of subsequent payment for products / services that the guest did not report when checking out of the hotel is your credit card information.

By entering the video surveillance system of the Processing Manager, it is possible to collect personal video data. The video is collected for the purpose of protecting persons and property.

As part of the business relationship, you are obliged to make available personal data that are necessary for the establishment and implementation of the business relationship and the fulfillment of related contractual obligations or for the collection of which there is an obligation. Without this information, we are generally forced to refuse to conclude a contract, execute an order or suspend execution and terminate an existing contract. You are not required to give your consent to the processing of that data which are not relevant or prescribed by law for the performance of the contract.

### 3. Legal basis and purposes of personal data processing

All types of your personal data are processed by the Processing Manager for the following purposes and on the basis of:

- a) Fulfillment of Legal Obligations** - We process your personal data in accordance with applicable regulations as well as for the purpose of notifications and reports that we are obliged to make in accordance with applicable regulations, all for the purpose of fulfilling legal obligations;
- b) Realization of the contract** - We process personal data for the purpose of realization of the contract and fulfillment of contractual obligations which are the subject of the contract (eg the Law on Obligations), and on the basis that processing is necessary for fulfillment of contractual obligations;
- c) For the purpose of contacting** for the purpose of efficient execution of business contracts, requests for information, etc., based on the consent you have given us or based on the legitimate interest of the Processing Manager;
- d) For the purpose of promotion** - The processing manager processes the name and surname and e-mail address based on the consent you gave us by subscribing to the newsletter.
- e) For the purpose of providing adequate wellness treatment and insurance against possible claims for damages** - the Processing Manager processes the health data of wellness service users based on the legitimate interest of the Processing Manager;
- f) For the purpose of subsequent payment for products / services that the guest did not report upon check-out from the hotel** - the Processing Manager processes the guest's credit card data based on the legitimate interest of the Processing Manager;
- g) For the purpose of protection of persons and property** - Video surveillance of the premises, based on the legitimate interest of the Processing Manager;

All your personal data is processed on the basis of **law, contract, legitimate interest or consent**.



## 4. Retention period

We generally delete your personal data after the termination of the contractual relationship and after the expiration of the purpose of processing, and at the latest after the expiration of all legal obligations related to the storage of personal data and until the withdrawal of consent, or until we request renewal of consent.

## 5. Management of consents for the processing of personal data

You can change your consent (full or partial revocation) by contacting us by e-mail at: **voditelj.obrade@manas.hr** or by mail at: **Cornaro hotel, Sinjska 6, 21000 Split**

If you revoke the given consents, we will no longer use your data for the stated purposes, but this may result in the impossibility of using some additional benefits related to them.

Withdrawal of consent does not affect the lawfulness of processing based on consent before it is withdrawn.

If you want to give your consent again, you can do so in the same way as if you revoked it.

If you do not provide us with your personal data, which does not require consent, and which is necessary for concluding a contract with us, fulfilling a concluded contract or due to obligations we have under the law, we will not be able to fulfill our contractual obligations to you. contract.

## 6. Rights of respondents

a) **Right of access and information on the processing of personal data:** You have the right to ask us to confirm whether personal data relating to you are processed and the purpose of processing if such personal data is processed, groups of your personal data we hold, third parties or groups of third parties the parties with whom your personal data is shared, the period of time during which we retain the data as well as the source of your personal data that we did not collect directly from you

**b) Right to Correction:** If we process your personal data that is incomplete or inaccurate, you may at any time ask us to correct or supplement it.

**c) Right to delete:** You can ask us to delete your personal data

**d) Right to Restrict Processing** - You can request a restriction on the processing of your data:

- If you dispute the accuracy of the data during a period that allows us to verify the accuracy of that data,
- if the data processing was unlawful, but you refuse to delete it and instead request a restriction on the use of the data and
- if we no longer need the data for the intended purposes, but you still need them to meet legal requirements, or if an objection has been filed for the processing of such data.

**e) The right to object** to the processing of personal data

**f) The right to the possibility of data transfer** - You can ask us to provide you with the data entrusted to us in a structured form, in the usual machine-readable format:

- If we process this information based on the consent you have given us and which you can revoke and
- if processing is performed using automated processes.

**g) The right to lodge** a complaint with the supervisory authority: If you are of the opinion that we have violated Croatian or European data protection regulations during the processing of your data, please contact us to clarify any issues. You certainly have the right to file a complaint with the Croatian Agency for Personal Data Protection.



**Confirmation of identity:** In case of doubt, we may request additional information to verify your identity, which serves to protect your rights.

**Abuse of rights:** If you use any of these rights too often and with an obvious intent to abuse, we may charge an administrative fee or refuse to process your request.

## 7. Data transfer to third parties

We undertake to keep your personal data and will not disclose or make it available to third parties except in the following cases:

- If you expressly agree in writing to disclose certain confidential information for a specific purpose or to a specific person,
- if the information is necessary for the Ministry of the Interior or the competent state attorney's office for the purpose of performing tasks within their competence,
- if the information is required by the court, lawyers or notary public for the proceedings they are conducting, and the presentation of such information is required in writing,
- if this information is needed by the tax administration, the Pension and Health Insurance Institute, all on the basis of the legal obligations that the processing manager has towards them,
- if this information is needed by the Ministry of Finance or the tax authority in the procedure it conducts within its competences and
- if we have to provide data to third parties as part of a contractual relationship.

## 8. Use of digital services (Website, applications)

We collect only those personal data that visitors to our official website voluntarily make available to us when submitting requests for contact and business information, requests to enter into a business relationship, job competitions, callback services, requests to receive newsletters and other electronic forms. This personal information is used confidentially and only for the specific purpose stated with each form. We transfer personal data to third parties if there is a legal obligation or order of an official body, when these personal data can be transferred to the competent authority and only those data that are necessary for that. Access to the website is recorded and technical data such as page traffic, operating system used, screen resolution, time of visit and size of transmitted data are recorded.

In order to improve our offer, the website contains "cookies" that are stored on the computer of visitors to our official website. The storage of "cookies" can also be prevented, but in this regard, a limited offer of our official website is possible. "Cookies" provide the ability to store the characteristic preferences of website visitors, optimize technical processes and continuously improve the offer.

## 9. Technical and organizational measures

We have taken all technical and organizational measures to protect your data from loss, alteration or access by a third party. In case of any questions, feel free to contact us, and we will answer your requests, requests, concerns and help you exercise your rights as soon as possible.

Any changes regarding our privacy policy will be published in the Privacy Statement on our official website and you will be adequately informed about them.