

INFORMATION AND PRINCIPLES OF PERSONAL DATA PROCESSING

Act No. 110/2019 Coll., on the Processing of Personal Data (hereinafter referred to as the “Act”)

I. PERSONAL DATA CONTROLLER

KORZO LIPNO s.r.o., with its registered office at Nemanická 2722, České Budějovice 3, 370 10, Company ID No.: 28138953, tel.: +420 722 075 630, Data Box ID: yg3343f (hereinafter referred to as the “Company” or the “Controller”), acting as the controller¹ of personal data, hereby provides information, pursuant to the Act, on the manner and scope of personal data processing, including the scope of the related rights of data subjects. Unless otherwise stipulated by the Act, the relevant provisions are those of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 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 (General Data Protection Regulation), hereinafter referred to as the “GDPR”.

II. SCOPE OF PERSONAL DATA PROCESSING

Personal data are processed to the extent to which the relevant data subject has provided them to the Controller in connection with the conclusion of a contractual or other legal relationship with the Controller, or to the extent to which the Controller has otherwise collected them and processes them in accordance with applicable legislation or in order to fulfil the Controller’s legal obligations under the Act.

III. SOURCES OF PERSONAL DATA

Personal data are obtained directly from data subjects who provide them voluntarily, for example when entering into a contractual relationship, including by email, in person or by telephone in connection with reservations and accommodation addressed to the Controller. Such data constitute a basic prerequisite not only for entering into or amending a contractual relationship, but also serve primarily for the clear and unambiguous identification of data subjects. These data are required by generally binding legislation as essential particulars for dealings between the contracting parties and for the Company’s compliance with the law.

The sources include, in particular, personal data provided directly, as well as derived data from the information provided, publicly available registers, lists and records, for example the Commercial Register, the Trade Licensing Register, public telephone directories and similar sources.

The Controller may also process data obtained from CCTV systems under its administration or ownership. Such systems are operated for the purpose of protecting persons and the Controller’s property against possible unlawful conduct by other persons.

IV. CATEGORIES OF PERSONAL DATA SUBJECT TO PROCESSING

- Identification data are always classified according to the type of data subject and the purpose of personal data processing, and their scope is determined by what is necessary for the relevant processing purpose. Identification data include, in particular: first name, surname, title, date of birth, identity document number, tax identification number, permanent or temporary address, registered office where applicable, signature, citizenship, nationality,

previous education details and similar information. Identification data also include any personal data on the basis of which we are able to identify you unambiguously.

- Contact data include, in particular, a contact or delivery address, telephone number, email address and similar information. Contact data also include personal data on the basis of which we are able to contact you. More detailed information on the specific categories of personal data we process is contained in the document by which you either grant us consent to the processing of personal data or by which we inform you about the processing of personal data in connection with the provision or performance of a contractual relationship, including the lease or rental of accommodation capacity, the sale of real estate or other purposes of personal data processing, on the basis of our contractual or legal obligations, or where applicable on the basis of a legitimate interest.
- Descriptive, authentication and payment data, for example bank details, login or registration details, payment details and reservation details.
- Other data necessary for the performance of a contract, as well as data provided beyond the scope required by applicable laws and processed on the basis of consent granted by the data subject, including the processing of photographs or the use of personal data for personnel procedures and similar purposes.
- Special categories of personal data, in particular information concerning your health, but only where such personal data are provided by you or where their processing is required by the applicable laws of the Czech Republic.

Data concerning your behaviour on our website. Further information is provided in the Cookie Policy published on the following websites:

<https://www.apartmanykorzo.cz/>

<https://korzolipno.cz/>

<https://www.korzodelta.cz/en/>

V. CATEGORIES OF DATA SUBJECTS

Accommodation providers, accommodated persons, guests, interested persons, sellers, buyers, employees of the Controller, external collaborators, whether self-employed or not, partners of the Controller, carriers, service providers or other persons who are in a contractual relationship with the Controller, job applicants, natural persons involved in the processing of personal data and other data subjects.

VI. Kategorie příjemců osobních údajů

Recipients may include public authorities, including the Police of the Czech Republic, the Foreign Police, enforcement officers and other state authorities, in connection with the fulfilment of legal obligations imposed by applicable legislation, including authorities, institutions and similar bodies, or on the basis of consent granted by you to the processing of personal data.

Recipients may further include the Regional Public Health Authority and other state administration and local government bodies, partner, sister or parent companies involved in providing services to you, persons arranging postal and email distribution, supplier companies providing IT administration, website administration, Christmas greetings, customer satisfaction questionnaires and technical processing operations, including suppliers of information systems and applications, as well as other processors of the Controller or other possible recipients in the Czech Republic, abroad or in EU Member States.

More detailed information concerning processors and recipients of personal data is contained in the document by which you either grant us consent to the processing of personal data or by which we inform you about the processing of personal data in connection with the provision or sale of our product or a specific service on the basis of our contractual obligations or, where applicable, on the basis of a legitimate interest.

VII. PURPOSES OF PERSONAL DATA PROCESSING

The purposes of processing the personal data of data subjects include:

- negotiations concerning a contractual relationship and performance of a contract, including the conclusion and performance of a lease, rental or other contractual relationship necessary for the provision of services requested by you;
- accommodation reservations;
- guest registration cards and accommodation records;
- the sale of real estate and related business activities;
- maintenance of property;
- customer support;
- obtaining and evaluating information related to services provided by us;
- handling applications, requests and inquiries related to the above purposes of processing personal data;
- possible registration for newsletters, invitations and promotion of the Company;
- employee recruitment and selection procedures for vacant positions;
- negotiation, conclusion and performance of lease and rental agreements pursuant to Act No. 89/2012 Coll., the Civil Code;
- internal administrative needs, internal records and the protection of the rights and interests of the Controller, recipients or other affected persons, including the recovery of claims, compensation claims, administrative proceedings under special legislation and the preparation of statistics;
- archiving carried out on the basis of law;
- fulfilment of the Controller's legal obligations and performance of its lawful activities;
- protection of the vital interests of the data subject;
- improvement of the Controller's website based on its use;
- statistical reporting.

VIII. METHOD OF PROCESSING AND PROTECTION OF PERSONAL DATA

Personal data are processed only by employees at the workplaces, registered office and branches of the Controller, and also with the assistance of processors and computer technology. Personal data in paper form may also be processed manually, while observing all security principles and technical and organisational measures applicable to the administration and processing of personal data.

IX. PERIOD OF PERSONAL DATA PROCESSING

In accordance with the periods specified in the relevant contracts, the Controller's filing and retention rules or applicable legal regulations, personal data are processed for the period strictly necessary to secure the rights and obligations arising both from contractual relationships and from applicable legislation. The Controller is obliged to observe these periods.

X. INFORMATION NOTICE

The Controller processes personal data with the consent of the data subject, except in cases provided for by law where the processing of personal data does not require the data subject's consent under the Act, unless otherwise stipulated as a result of statutory exceptions or the GDPR.

In accordance with the Act and Article 6(1) of the GDPR, the Controller may process personal data without the consent of the data subject where:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the Controller is subject;
- processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data.

XI. TECHNICAL AND ORGANISATIONAL MEASURES FOR THE SECURITY OF DATA SUBJECTS' PERSONAL DATA

1. The Controller has adopted and maintains, in particular, the following measures to ensure an appropriate level of personal data security:

- all persons who are or will be granted access to personal data have been or will be instructed on their obligations before such access is provided and properly trained by the Controller in the area of personal data processing;
- the functionality and effectiveness of measures ensuring the security of personal data are regularly reviewed to the necessary extent through internal audit and review activities relating to measures and documentation;
- records are kept that make it possible to determine and verify when and by whom personal data were recorded or otherwise processed;
- personal data are encrypted and/or anonymised where appropriate;
- the Controller maintains the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services, taking into account the technical measures implemented and their regular review;
- the Controller maintains the ability to restore the availability of personal data;
- a process has been introduced for regularly testing, assessing and evaluating the effectiveness of implemented measures designed to ensure the security of processing;
- the integrity of communication networks is protected;
- antivirus protection and controls against unauthorised access are implemented;
- secure data transmission methods are used that allow the recipient to be clearly identified by appropriate tools;
- where personal data are processed electronically, they are stored exclusively on secure servers or secure data carriers.

2. The Controller continuously adopts additional safeguards for the technical and organisational security of personal data, in particular measures designed to prevent unauthorised or accidental access to personal data, accidental or unlawful destruction, loss, alteration or unauthorised

disclosure of personal data (hereinafter referred to as a "personal data breach"), at the Controller's discretion and taking into account the state of the art.

XII. RIGHTS OF DATA SUBJECTS

1 The basic and necessary requirements for requests concerning the exercise of data subjects' rights are published in the document entitled "Requirements for the Exercise of Rights", which is available on all our websites.

That document lists the rights of data subjects and includes forms for exercising such rights. Requests may be submitted by email to mtravnicek@algotech.cz or at the Controller's workplace.

2. In accordance with Section 28 of the Act, upon request by a data subject, the Controller informs the data subject of the right of access to personal data and provides the following information:

- the purposes of processing and the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, the envisaged period for which the personal data will be stored, and all available information concerning the source of the personal data;
- where the personal data have not been obtained from the data subject, information on whether automated decision-making, including profiling, takes place, as well as information on the right to request rectification, restriction of processing or erasure of personal data and information concerning the source of such data.

3. Any data subject who discovers or believes that the Controller or processor is processing his or her personal data in a manner that interferes with the protection of the data subject's private and personal life or is contrary to law, in particular where the personal data are inaccurate with regard to the purpose of processing, may:

- request an explanation from the Controller and further request that the Controller remedy the situation. This may include, in particular, blocking, rectifying, supplementing or erasing personal data;
- where the data subject's request under paragraph 1 is found to be justified, the Controller shall remedy the defective situation without undue delay;
- where the Controller does not comply with the data subject's request under paragraph 1, the data subject has the right to contact the supervisory authority directly, namely the Office for Personal Data Protection, with its registered office at Pplk. Sochora 27, 170 00 Prague 7, telephone: +420 234 665 800, email: posta@uoou.cz;
- the procedure under paragraph 1 does not prevent the data subject from submitting a complaint directly to the supervisory authority;
- contact details of the Controller's Data Protection Officer:
- Martin Trávníček, MBA
- email: mtravnicek@algotech.cz
- or the address of the Controller's registered office.

¹ The personal data controller determines the purposes and means by which personal data will be processed, collected, recorded, sorted or disclosed, and is also responsible for the proper performance of such processing of your personal data.