

PRIVACY POLICY
TWIN Boarding House

This Privacy Policy (hereinafter referred to only as the "**Policy**") contains information about the processing of your personal information by the **TWIN Jasná Company, s.r.o.**, residing at Račianska 66, 831 02 Bratislava, ID: 45 601 895, registered in the Commercial Register of the Municipal Court Bratislava III, section: Sro, insert no. 65551/B (hereinafter referred to only as the "**Operator**"), which occurs through the webpage www.twinjasna.com and linked profiles on social networks and communication channels of the Operator.

Through this Policy, the Operator gives you information about why your personal data is processed, how it is processed, how long does the Operator store it, what are your rights in the context of processing your personal data and other relevant information on the processing of your personal data.

The Operator processes your personal data in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 only as the "**Regulation**"), the relevant Slovak legal regulations, especially the Act No. 18/2018 Coll. on Personal data protection and amending and supplementing certain Acts (hereinafter referred to only as the "**Act**") and other regulations on the protection of personal data (*Regulation, Act and other regulations on the protection of personal data* hereinafter referred to only as the "**Regulations on the protection of personal data**").

In matters related to the processing and protection of personal data, you can contact the Operator at the address TWIN Jasná, s.r.o., Račianska 66, 831 02 Bratislava or by email at twin@penziontwin.sk. The Operator did not designate a person responsible for the processing and protection of personal data.

The Operator obtains your personal data through the webpage during online booking or through profiles on social networks directly from you, if you provide it to him. The provision of personal data for all the purposes stated below is voluntary.

INFORMATION FOR PROCESSING OPERATIONS (categories of personal data, processing purpose, legal bases and retention periods)

The Operator processes your personal data **exclusively in accordance with the minimization principle**, which means that the Operator is not asking you for personal data, which is not necessary for a specific and justified processing purpose. **The Operator processes personal data only if there is a legal basis for it, thus, they are processed in accordance with the legality principle.** Specific purposes with stated legal basis and retention period, for which the Operator processes your personal data can be found in the table below.

Purpose of processing	Answering messages and processing inquiries / requests from messages delivered to the Operator through messages on social networks, email communication or by phone.
Legal basis	Article 6, Section 1, Letter f) of the Directive – <i>the processing of personal data is performed based on a legitimate interest of the Operator, which is the answering of delivered messages, for the proper management of business communication, improvement of the quality of provided services and acquisition of new clientele</i>
Categories of personal data	Name, surname, email address, phone number, other data stated in the message
Retention period	30 days from the day the request has been delivered or until the request is fulfilled (fulfilment of the purpose), depending on which fact occurs first

Purpose of processing	Accepting and recording reservations
Legal basis	Article 6, Section 1, Letter b) of the Directive – <i>the processing of personal data is performed during the implementation of pre-contract relations (booking a date for the stay based on a request of the person concerned)</i>
Categories of personal data	Name, surname, email address, phone number, state, credit card number, name and surname of the credit card holder
Retention period	Until the contractual relation has been concluded (booked date of the stay) and after its conclusion until the full settlement of the contractual and other claims arising from the contractual relation. If a contractual relation is not concluded (stay based on booking), 60 days after the booked date of the stay.
Purpose of processing	Publishing references of clients' satisfaction with the services of the Operator on the webpage of the Operator during presentation activity
Legal basis	Article 6, Section 1, Letter a) of the Directive – <i>the processing of personal data is performed based on consent of the person concerned</i>
Categories of personal data	Name, surname, location, other personal data stated in the reference
Retention period	5 years after the day when consent was given or until it is revoked, depending on which fact occurs first
Purpose of processing	Fulfilling the rights exercised by the persons concerned
Legal basis	Article 6, Section 1, Letter c) of the Directive – <i>the processing of personal data is performed in the fulfillment of legal obligations</i>
Categories of personal data	Ordinary personal data, which is part of the request
Retention period	Until the exercised rights have been fulfilled
Purpose of processing	Recording the rights exercised by the persons concerned
Legal basis	Article 6, Section 1, Letter f) of the Directive – <i>the processing of personal data is performed based on a legitimate interest of the Operator, which is the recording of the rights exercised by the persons concerned for the purpose of proving the fulfillment of the obligations arising from the legal regulations</i>
Categories of personal data	Ordinary personal data, which is part of the request
Retention period	5 years after the day the rights have been exercised

Purpose of processing	Processing personal data for the purpose of measuring the visit rate of the webpage and targeting of advertising of the Operator (through cookie files)
Legal basis	Article 6, Section 1, Letter a) of the Directive – <i>the processing of personal data is performed based on consent of the person concerned</i>
Categories of personal data	Data on activity on the webpage of the Operator and on the preferences in the online environment
Retention period	2 years after the day when consent was given or until it is revoked, depending on which fact occurs first

For the purpose of ensuring protection of your personal data, the Operator has taken adequate security measures.

TO WHOM DOES THE PROVIDER GIVE YOUR PERSONAL DATA?

In specific cases, the Operator has the obligation to provide your personal data to the public authorities, which are authorized to process your personal data, for example, to courts, law enforcement authorities and supervisory authorities (for example, the Slovak Trade Inspection) (third parties).

The Operator provides your personal data also to his **contractors**, i.e., external subjects, who process your personal data on behalf of the Operator. The contractors process your personal data based on a contract concluded with the Operator, in which they committed themselves that they have adopted adequate technical and security measures for the purpose of safely processing your personal data. The Operator's contractors include:

- **company providing hosting services (including mail hosting services) (..... s. r. o.),**
- **company providing webpage and social network profiles administration services – online advertisement services (..... s.r.o.) and**
- **company providing the online booking system (Booking Holdings Inc.).**

The recipients of your personal data also include the Google Ireland Company Limited, which provides analytical and marketing services through cookie files, which are stored on your device by the webpage, if you give consent to the Operator with the storing of these cookie files.

The recipients of your personal data also include the operator of the Facebook and INSTAGRAM social networks (the Facebook Ireland Company Limited) if you contact the Operator via a message on the social networks of the Provider, or share the webpage or its content on the social networks. This company acts in the processing of your personal data in the position of a joint operator with the Operator and the processing of your personal data in this case is guided by the agreement of the join operators, in accordance with Article 27 of the Regulation, according to which the Operator is the point of contact.

TRANSFER TO THIRD PARTIES AND INTERNATIONAL ORGANIZATIONS

In some cases, your personal data can be transferred to third countries, to the US:

- **Facebook Company, Inc.** (the parent company of the European operator of the Facebook and INSTAGRAM social networks), when processing your messages delivered to the Operator via social networks and when using marketing cookie files on the webpage of the Operator (online marketing services in case of your consent) and

- **Google Company, LLC**, when using analytical and marketing services and tools using cookie files.

The transfer is performed in accordance with the Regulations on the protection of personal data, based on standardized contractual clauses, (which are part of the contractual terms and conditions of using said services) and the Operator fulfills all obligations associated with the transfer.

When processing your personal data, the Operator does not use profiling and the personal data is not processed by any form of automated individual decision-making, in which your personal aspects would be evaluated.

WHAT ARE YOUR RIGHTS IN THE CONTEXT OF PROCESSING YOUR PERSONAL DATA?

In the context of processing your personal data, you, as the person concerned, have the following rights:

Your rights	
<p>Right to access – As the person concerned, you have the right to obtain a confirmation from the Operator on whether he is processing your personal data and if yes, you have the right to obtain access to this personal data and information according to Article 15 of the Regulation. The Operator shall provide you with a copy of your personal data, which is being processed. If you submit your requests by electronic means, the Operator shall provide you the information in the commonly used electronic form, unless you request a different method.</p>	<p>Right to correct – In order to ensure the accuracy, completeness and timeliness of your personal data, the Operator has adopted adequate measures. As the person concerned, you have the right for the Operator to correct your incorrect personal data or complete your incomplete personal data without undue delay.</p>
RIGHT TO OBJECT	
<p>You have the right to object to the processing of your personal data, for example, in case the Operator processes your personal data based on a legitimate interest or in case the processing includes profiling. If you submit an objection against this processing of your personal data, the Operator will no longer process your personal data, unless you demonstrate necessary legitimate reasons for further processing of your personal data.</p>	
<p>Right to delete (right “to be forgotten”) – You also have the right to achieve with the Contractor, without undue delay, the deletion of your personal data, if certain conditions are met, for example, in case the personal data is no longer necessary for the purposes, for which the Operator obtained and processed them. However, it is necessary to consider this right individually, since there can be a situation, when other circumstances prevent the Operator from deleting your personal data (for example, a legal obligation of the Operator). This means that in this case, the Operator will not be able to fulfill your request to delete your personal data.</p>	<p>Right to transfer data – Under specific circumstances, you have the right to transfer your personal data to another operator you designate. However, the right to transfer applies only to the personal data the Operator processes based on the consent you have given to the Operator based on the contract, which you are a party, or in case the Operator processes personal data using automated means.</p>
RIGHT TO REVOKE CONSENT	
<p>If the Operator is processing your personal data based on your consent, you have the right to revoke the consent at any time in the same way you have given it. Revoking the consent does not affect the legality of the processing performed prior to revoking your consent.</p>	

<p>Right to limit processing – You also have the right for the Operator to limit the processing of your personal data. This will be the case if, for example, you will challenge the accuracy of your personal data or if the processing is illegal and you request the processing to be limited, or if the Operator no longer needs your personal data for processing purposes, but you need it for proving, exercising or defending legal claims. The Operator shall limit his processing of your personal data if you request it.</p>	<p>Right to file a complaint or initiative – In case you feel your personal data is being processed in violation with the applicable legal regulations, you can address your complaint to the supervisory body, which is the Office for Personal Data Protection of the Slovak Republic, residing at Hraničná 12, 820 07 Bratislava 27; webpage: dataprotection.gov.sk, phone no.: 02 3231 3214; e-mail: statny.dozor@pdp.gov.sk</p>
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You can exercise your rights listed in the table above at the contact addresses of the Operator, which are listed at the beginning of this document.

The Operator shall provide you an answer to the exercising of your rights free of charge. In case of repeated, illegitimate or inadequate request for the exercising of your rights, the Operator has the right to charge you an adequate fee for the provisioning of information. The Operator shall provide you with an answer within 1 month since the day you have exercised your rights. In specific cases, the Operator has the right to extend this period, in case there is a higher number and complexity of requests from the persons concerned, however for no longer than 2 months. The Operator shall always inform you about the extension of the deadline.

SOCIAL NETWORKS AND LINKS TO OTHER INTERNET PAGES

As part of marketing and advertising support, you can find link to different social networks, like, for example, Facebook and INSTAGRAM on the webpage of the Operator. The Operator is hereby notifying you that after clicking on a link on his webpage and going to the social network, the personal data protection rules of the social network operator start to apply, with the exception of cases, when you contact the Operator via a message on a social network, (in which case the processing of your personal data is governed also by this Privacy Policy and your personal data is processed by the Operator in accordance with the information stated above).

Detailed information on the processing of your personal data by the operators of social networks can be found here: (i) Facebook: <https://sk-sk.facebook.com/policy.php> and (ii) Instagram: <https://www.facebook.com/help/instagram/155833707900388>.

VALIDITY

This Privacy Policy is valid and effective from 01.11.2023. Given that it may be necessary to update the information on the processing of personal data contained in this Privacy Policy, the Operator has the right to update this Privacy Policy at any time. However, in such case, the Operator shall inform you about this fact in advance and in an appropriate way.