

Loyalty program CHARMING REWARDS

Information about the protection of personal details

Information regarding the processing of Your personal details within the “CHARMING REWARDS” program (further “**Program**”) of the company ResMaster Systems s.r.o., Registration Number: 26759136, Budečská 17, 120 00 Prague 2, Czech Republic; can be found in this Information about the protection of personal details.

1. Responsibility of protecting personal details

The company ResMaster Systems s.r.o., Registration Number: 26759136, Budečská 17, 120 00, Prague 2, Czech Republic. (Also “**ResMaster**” or “**Partner company**”) is responsible for protection of personal details within the Program occurring in the region of Czech Republic.

The company Hotelpro s.r.o., Registration Number: 256 49 019, Budečská 796/17, 120 00, Prague 2, Czech Republic. (further “**Hotelpro**”) as a processor of the personal details within the Program as a operator of the following Hotels and websites:

- Hotel Anna, Budečská 17, 120 00, Prague 2, Czech Republic, www.hotelanna.cz
- Hotel Atlantic, Na Poříčí 9, 110 00, Prague 1, Czech Republic, www.hotel-atlantic.cz
- Hotel Páv, Křemencova 13, 110 00, Prague 1, Czech Republic, www.hotel-pav.cz
- Best Western Premier Hotel Essence, Senovážné náměstí 870/27, 110 00, Prague 1, Czech Republic, www.hotelessence.cz
- www.smallcharminghotels.com

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 within the Program and as a operator of the following Hotel:

- Hotel Start, Bedřichov 17, 543 51, Špindlerův Mlýn, Czech Republic, www.hotelstart.cz

2. Your registration and membership details

2.1. Your details during the registration into the Program

Should you wish to participate in the Program, we will require from you: your full name (title, name and surname) and an email address as compulsory detail. Then you may voluntarily give full address (street, street number, entry, flat number, post number, city, state), phone number and date of birth (all the above details will be marked as “**membership details**”). These membership details will be stored under Your password that You should not share with any third party. Your password is encrypted in our system. Therefore it is not known to us. Membership details are required and processed for the purpose of Your registration and realization of the Program. Registration process is done online on the following website: www.smallcharminghotels.com/en/charming-rewards/sign-up/

Membership details also serve as login details to Your account. For the purpose of regular update of Your details and their processing in accordance with legal obligations, we can

cooperate with different external services (sub-processors) - the up to date list is available on: www.smallcharminghotels.com .

Your membership details will not be transferred to third parties not involved in the Program.

Any person who has reached 18 years of age can become a member of the Program. We would like to inform you that contractual documents are sent in electronic form and communication is strictly in Czech or English language.

Participation in the Program is free of charge and does not imply an obligation to make a reservation at any accommodation.

2.2. Your details during the collection of points

When obtaining details about your transactions, we use the following information: the name of the hotel, stay dates, length of stay and the total amount paid for all services.

The points are credited to Your membership account. To access your account, you must log in using your email address and password. Each registered member can display his/hers current amount of points and a history of used points after entering log-in details.

The collection of points is described at <https://www.smallcharminghotels.com/en/earning-points>

2.3. Your details when using the points

The services are strictly ordered online at our partner company. If you decide to use your points, the appropriate hotel will receive a written notification about the type of the ordered/used services according to your choice.

2.4. Your details when communicating with us

Communication is provided by 24-hour reception in each of the hotels according to the first paragraph. The partner company will process the appropriate details in order to process your requests.

2.5. Legal basis when processing details according to paragraph 2.

The legal basis for the processing of any personal details during the registration and participation in the Program is in paragraph 6, the first sentence. b) (fulfilment of the contract about making measures accepted before its implementation) Ordinance of European parliament and Board (EU) 2016/679 on the day of 27th April 2016 regarding the protection of physical individuals in connection with processed personal details and free movement of those details and cancellation of the guideline 95/46/ES (basic ordinance of protection of personal details) (also as a “GDPR”).

2.6. Termination of the membership

The participation in the Program can be terminated without any period of notice whenever the member decides to do so. Members can cancel their membership online within their personal

account. The effects of the termination begin with the cancellation of the account – a confirmation of the cancellation of the account will be displayed on the screen of the members PC/mobile device after the request is sent. Unused points will be lost without any compensation. In a case of a new registration the member will not accrue any benefits from a previous (terminated) registration.

2.7.

Company ResMaster, Hotelpro and Hotel Start reserve the right to end, edit or change the Program. Members will receive a written notice one month before the adjustments. In the case of any change of legal obligations the period above does not have to be met.

2.8.

Company ResMaster, Hotelpro and Hotel Start also reserve the right to supplement or amend the Conditions of participation in the Program, precisely if it is in the interest of simplicity and for the security of safe processing of personal details and points and/or to prevent misuse of the system.

All the changes will be posted on the website: www.smallcharminghotels.com and members will be also informed of the changes via email.

3. Advertising and market research

3.1. Your consent with a advertising and market research

Your consent for the purpose of advertising and market research – by ticking the box You express your consent with advertising and market research. The companies Hotelpro and Hotel Start can provide advertising tailored to your individual interests and individual needs. Hotelpro and Hotel Start use cookies to provide services, customize ads, and analyze traffic.

Company Hotelpro and Hotel Start can also analyse Your details (according to paragraph 2.1. above), for the purpose of **optimization of the offer, localization and services** and use the data for the purpose of market research.

Information can be also send to You in the form of email, based on a separate agreement with sending **Newsletters** - if you sign up for the subscription of electronic bulletin (also “**Newsletter**”) we will inform Your regularly about Your current amount of points, possible rewards and business offers from each hotel.

Your registration into the Program is valid even without giving an approval for the advertising and market research.

3.2. The right to withdraw the agreement

If you provided an agreement with the processing of Your personal details for the purpose of advertising and market research, you may withdraw Your approval, e.g. online - delete the history of cookies files and their blocking or unsubscribe from the Newsletters. You can use unsubscribe button (link) in each email in order to unsubscribe from our newsletters.

Withdrawal of consent does not affect the lawfulness of the processing of personal data pursuant to this agreement until the moment of its withdrawal. If you did not provide an agreement or withdrew from it, Your personal details will not be used according to the past paragraphs. However, you may still participate in the Program or continue your participation in it. In that case, the information sent to you will be only relevant information regarding Your usage of the Program (e.g. a notice regarding the number of collected points).

3.3. The purpose of processing personal details according to paragraph 3.

The legal basis for processing personal details described in paragraph 3.1. further adds to paragraph 6.1. a) GDPR (agreement – see provisions about the right to withdraw from an agreement in paragraph 3.2. further paragraph 6.1. f) GDPR (rightful interest based on the interest of company Hotelpro and Hotel Start and partner company to successfully provide commercial, focused on individual interest of the recipients – see paragraph 3.1. further regarding the right to raise an objection). We alert that this type of processing of personal details covers profile, but not automated decision making.

4. The period of storing the details

Your membership details are kept during the period of Your participation in the Program. In case of termination Your details will be immediately deleted, unless the legal obligations including tax would impose duties that would have kept the details stored – in that case these details would be deleted after a duration of 10 years. Your details regarding sales will also be deleted after the duration of storing the details which accounts for 10 years from the date of transaction. Your details regarding communication will be kept for the period necessary, unless special legal obligations state otherwise, in some cases being longer period and/or in a justified case does not occur in a situation when the details are needed to be stored for a period longer in relation with a precise case. If you do not need these details for the purposes described in paragraph 2. or 3. Above, these details will be stored only for the appropriate period of storing details requested by legal obligations, including taxation or tax legislative and will not be further processed for other purposes.

5. The processing of Your personal details outside of the EU/EEA

Your details will not be transferred outside of Czech Republic.

6. Your rights

Upon a request you will be informed if and what details about You are being stored. In a case that legal requests will be met, you have the right to correct, limit processing or delete these details. You can also withdraw any agreement which you have made (see p. 3.) and – as described above – raise objections regarding the processing (see p.3.).

For this purpose, you may contact one of our Hotel receptions (see p.1.). You also have the right to be informed about the details which you have provided to us in a structured, regularly used and standardised machine-readable form: We/You can pass these details (in this format) to third parties. We are obligated to comply Your requests in the period of one month from its receiving if a longer period is not requested. In that case the extension cannot exceed two months.

You also have the right to make an official complaint to the Authority for protection of personal details with a residence in Pplk. Sochora 27, 170 00, Prague 7, www.uoou.cz , if you think that there has been a violation of principles for processing of Your personal details.

7. Visit to this website

If you visit any of the websites below you agree with the conditions of Processing personal details, that are published online.

www.resmaster.eu; www.smallcharminghotels.com; www.hotelanna.cz; www.hotel-atlantic.cz; www.hotel-pav.cz; www.hotelessence.cz; www.hotelstart.cz