

## **1. Personal Data Controller**

1.1. The controller of personal data is the company PECR - Apartments hotel s.r.o., ID No.: 28860110, with its registered office at Radlická 663/28, Smíchov, 150 00 Prague 5, registered in the Commercial Register maintained by the Municipal Court in Prague under file No. C 319942, email: provozni@pecr.cz (hereinafter also referred to as the "Controller").

1.2. The purpose of this document is to fulfill the Controller's information obligation arising from 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 as "GDPR") concerning visitors to its website at <https://www.pecr.cz/> (hereinafter referred to as the "Website"), recipients of commercial communications (newsletters), and customers who are natural persons (hereinafter referred to as "Data Subjects" or individually as "Data Subject").

## **2. Categories of Personal Data, Purposes, and Legal Basis for Processing**

The Controller processes the following categories of personal data of Data Subjects for specific purposes of processing with the legal basis specified below:

### **2.1. Compliance with legal tax obligations (fulfillment of legal obligations):**

For this purpose, the Controller processes the following data: Name, surname, residential address, email address, billing address.

### **2.2. Compliance with obligations under Act No. 326/1999 Coll., on the Residence of Foreign Nationals in the Czech Republic (fulfillment of legal obligations):**

For this purpose, the Controller processes the following data: Name, surname, date of birth, permanent address, document/visa number.

### **2.3. Compliance with obligations under Act No. 565/1990 Coll., on Local Fees (fulfillment of legal obligations):**

For this purpose, the Controller processes the following data: Name, surname, date of birth, permanent address, document/visa number.

### **2.4. Entering and fulfilling contracts for the provision of goods or services (fulfillment of the contract):**

For this purpose, the Controller processes the following data: Name, surname, date of birth, permanent address, document/visa number, vehicle registration number, email address, phone number, payment card number.

### **2.5. Debt recovery from Data Subjects or handling other customer disputes, particularly service complaints (legitimate interest):**

For this purpose, the Controller processes the following data: Name, surname, date of birth, permanent address, document/visa number.

**2.6. Ensuring evidence for the potential necessity of enforcing the Controller's rights (legitimate interest):**

For this purpose, the Controller processes the following data: Name, surname, email address, phone number, residential address.

**2.7. Sending commercial (marketing) communications (legitimate interest for Data Subjects who have previously received a service from the Controller; consent for Data Subjects who have not previously received any service from the Controller):**

For this purpose, the Controller processes the following data: Name, surname, email address, phone number, additional data obtained through marketing cookies (see Article 6 of these principles), particularly the identification of the Data Subject through identifiers and data about relevant preferences collected via cookies or combined with other data provided by the Controller's marketing partners.

**2.8. Recognizing existing users of the Controller's website, customizing services to user preferences, conducting analyses and measurements to determine how the Controller's services are used, the purchases made by users, evaluating user behavior on the website, analyzing user preferences, and displaying content tailored to individual user needs (consent, legitimate interest):**

For this purpose, the Controller processes the following data: Identification data obtained through cookies described in Article 6 of these principles. This includes how the website is used by the Data Subject, purchases made by users on the website, device identification, its technical parameters such as operating system and version, screen resolution, browser used and version, and similar data obtained from cookies and related technologies for device identification.

**2.9. Providing personal data necessary for fulfilling the contract and legal obligations of the Controller is mandatory.** Without providing personal data for these purposes, it would not be possible for the Controller to provide goods or services under the contract. No consent is required for the processing of personal data for these purposes. Consent is only required for requested sending of commercial (marketing) communications to Data Subjects who have not previously been provided any goods or services by the Controller and for the use of cookies.

**2.10. The legal basis for the processing of Data Subjects' personal data includes compliance with legal obligations, contract fulfillment, the Controller's legitimate interest, and the Data Subject's consent.**

### **3. Categories of Personal Data Recipients**

3.1. The Controller, in fulfilling its contractual obligations, uses the services of professional and specialized entities. If these entities process personal data provided by the Controller, they act as personal data processors and process the personal data only based on the Controller's instructions and may not use it for other purposes. These include entities involved in debt recovery, lawyers, auditors, IT system administrators, online advertising, or commercial representation. Each such entity is carefully selected by the Controller, and a data

processing agreement is concluded with them, which imposes strict obligations on the processor for the protection and security of personal data.

3.2. Processors are companies based both in the Czech Republic and within the European Union or in so-called secure countries. Any transfer and processing of personal data in countries outside the European Union always comply with applicable legislation.

3.3. Based on the consent of the Data Subjects given through the website interface (cookie bar), the Controller transfers personal data to cookie operators as described in Article 6 of these terms.

3.4. The Controller also transfers personal data to administrative authorities or other public administration bodies as required by applicable legislation to fulfill its legal obligations.

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## **4. Transfer of Personal Data to Third Countries**

4.1. Within the transfer of personal data to the Controller's processors or cookie operators, personal data is not transferred to third countries outside the European Economic Area.

## **5. Duration of Personal Data Processing**

5.1. Personal data of Data Subjects is processed for the duration of the contract concluded with the Controller and for four years from the end of the contractual relationship. In the case of processing based on compliance with legal obligations, the processing period is determined by the relevant legislation. In the case of processing based on legitimate interest, the data is processed only for as long as necessary to protect the Controller's legitimate interest or until an objection to further processing is submitted by the Data Subject. In the case of consent, personal data is processed for five years from the date of consent or until the consent is withdrawn.

## **6. Cookies**

6.1. The Controller informs Data Subjects that small files, such as cookies, will be stored on their devices and subsequently read from them when visiting its website. Cookies are small data files that allow websites to remember the actions and settings of individual users, so they do not need to be entered repeatedly. Cookies are stored on individual computers or other electronic devices via web browsers. For instance, cookies allow identifying users as existing users (e.g., when logging into their email account) or customizing the service to user preferences (e.g., weather forecasts).

6.2. The Controller uses necessary (technical) cookies, which are essential for the proper functioning of the website.

6.3. The Controller also uses marketing cookies on its website to display more precise advertising content on its website or third-party websites. Detailed information on marketing purposes, preference settings, giving consent to processing, objecting to processing, or specific marketing partners is available via the cookie bar on the website in the "Ad Settings" section.

6.4. Another category is third-party cookies (e.g., Google Analytics), which the Controller uses to monitor where users come from, which browser they use, how long they stay on the website, which pages they view, and purchases made by users. These cookies are controlled by third parties, and the Controller does not have access to read or write this data. The website uses the Google Analytics service provided by Google Inc. ("Google") to analyze website traffic and evaluate user behavior patterns. Data is stored and processed on Google servers in accordance with their privacy policies.

6.5. Personal data used by Google for analytical purposes is not transferred outside the European Economic Area.

6.6. Each Data Subject has the option to reject the use of some or all cookies via the cookie bar interface on the website. However, in some cases, it may not be possible to display certain services or products of the Controller without the use of cookies.

## **7. Rights of Data Subjects**

7.1. As a result of the processing of personal data, each Data Subject has the following rights:

**7.2. The right to request access to their personal data from the Controller.**

**7.3. The right to rectification of inaccurate personal data processed by the Controller.**

**7.4. The right to restriction of processing.** Restriction of processing means that the Controller must mark the personal data for which processing is restricted and, for the duration of the restriction, must not further process it, except for its storage. A Data Subject has the right to restriction of processing if:

7.5. The accuracy of the personal data is contested by the Data Subject, for a period allowing the Controller to verify the accuracy of the personal data;

7.6. The processing is unlawful, and the Data Subject opposes the erasure of the personal data and requests restriction of its use instead;

7.7. The Controller no longer needs the personal data for processing purposes, but the Data Subject requires it for the establishment, exercise, or defense of legal claims;

7.8. The Data Subject has objected to processing pending verification of whether the Controller's legitimate grounds for processing override the interests, rights, and freedoms of the Data Subject.

**7.9. The right to erasure of personal data.** This right applies only to personal data processed for purposes other than compliance with the Controller's legal obligations. The right to erasure applies exclusively if the processed personal data is no longer necessary for the stated purpose, processing is based on consent which the Data Subject has withdrawn, the Data Subject objects and there are no overriding legitimate grounds for further processing, the personal data has been processed unlawfully, erasure is required by law, or the personal data was collected in connection with the provision of information society services under Article 8(1) GDPR.

**7.10. The right to data portability.** The Data Subject may request that the Controller provide their personal data for transfer to another data controller or that the Controller itself transfers the data to another data controller. This right applies only to personal data processed automatically based on the Data Subject's consent or a contract.

**7.11. The right to lodge a complaint with a supervisory authority** if the Data Subject believes that the processing of their personal data violates personal data protection regulations. The Data Subject may file a complaint with the supervisory authority in their habitual residence, place of employment, or location of the alleged infringement. In the Czech Republic, the supervisory authority is the Office for Personal Data Protection, located at Pplk. Sochora 27, 170 00 Prague 7, website: [www.uoou.cz](http://www.uoou.cz).

**7.12.** If the Controller processes the Data Subject's personal data based on its or a third party's legitimate interests, the Data Subject has the right to object to such processing at any time. The objection may be submitted to the Controller's registered office or email address specified in Article 1.1 of these terms. If the Data Subject raises such an objection, the Controller may continue processing only if it demonstrates compelling legitimate grounds for processing that override the interests, rights, and freedoms of the Data Subject, or if the processing is necessary for the establishment, exercise, or defense of legal claims.

**7.13.** If the Controller processes the Data Subject's personal data for direct marketing purposes, the Data Subject has the right to object to the processing of their personal data for such marketing at any time, including profiling related to direct marketing. If the Data Subject objects to processing for direct marketing purposes, their personal data will no longer be processed for such purposes. The Controller does not engage in automated decision-making when processing personal data.

## **8. Method of Processing and Protection of Personal Data**

**8.1.** The processing of Data Subjects' personal data is carried out mainly at the Controller's premises and registered office by the Controller's authorized employees or processors. The processing is performed electronically or manually for personal data in paper form.

**8.2.** The Controller is authorized to process the Guest's personal data to the extent specified on the [registration card] under the fulfillment of the accommodation contract. Furthermore, the Guest may grant consent on the registration card for their data to be processed for marketing purposes.

8.3. To ensure the security of processed personal data and compliance with GDPR, the Controller has implemented appropriate organizational and technical measures in accordance with Articles 24 and 25 of GDPR.