

Personal Data Protection Policy

I. Basic Provisions

Pursuant to art. 4 (7) of the Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as “**GDPR**”), Lukáš Metelka with the seat in the Czech Republic, Vysoké nad Jizerou 383, 512 11 shall be the data controller (hereinafter referred to as the “**Controller**”).

Contact details of the Controller:

Address: Vysoké nad Jizerou 383, Czech Republic

Email: info@challet-nikola.cz

Phone no.: +420 777 074 472

Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

The Controller did not designate a Data Protection Officer.

II. Processed Personal Data Sources and Categories

The Controller shall process personal data that you have provided or personal data obtained in the course of handling your inquiry. The Controller shall process your identification and contact data, as well as any data required to process your inquiry.

III. Legal Basis and Purpose of the Processing

The legal basis for the processing is performance of a contract between you and the Controller pursuant to point b of Article 6(1) of GDPR; a legitimate interest of the Controller related to direct marketing (namely delivery of commercial communication and newsletters) under point f of Article

6(1) of GDPR; and, if no goods or services were ordered, your consent to the processing for the purposes of direct marketing (namely to receive commercial communication and newsletters) subject to point a of Article 6(1) of GDPR in connection with article 7(2) of the Czech Act no. 480/2004 Coll., on selected services of the information society.

The purpose of the processing is to process your inquiry or your subsequent order and to execute rights and obligations under the contractual relationship between you and the Controller. When sending an inquiry you need to provide data essential for its successful processing (i.e. full name, e-mail, contact phone number). Providing the said data is essential for handling the inquiry.

The Controller does not apply individual automated decision-making pursuant to article 22 of GDPR. You have given your explicit consent to such processing.

IV. Data Retention Period

The Controller shall retain personal data for the period necessary to execute rights and obligations under the contractual relationship between you and the Controller and necessary to pursue claims under such contractual relationships (for the period of 15 years after the contractual relationship has expired); until the consent to personal data processing for marketing purposes is withdrawn. Once the personal data retention expires, the Controller shall erase the said data.

V. Personal Data Recipients (Subcontractors of the Controller)

The recipients of personal data shall mean providers of travel services and related services / accounting services under a contract and other providers of marketing services.

The Controller shall not transfer personal data to any third country (outside EU) or to any international organization.

Subcontractors of the Controller, provided services, marketing and supporting service providers:

- Swallow s.r.o., – Mailchimp administrator
- Youtube.com – records numbers of video views and user journey on youtube
- Google Analytics – records cookies and the use of the Internet
- Google Adwords – records cookies and the use of the Internet
- Mailchimp – records e-mail addresses

VI. Your Rights

Subject to the provisions of GDPR you have the following rights:

- right of access to personal data that concern you, subject to article 15 of GDPR;
- right to rectification of your personal data, subject to article 16 of GDPR, alternatively to restrict data processing subject to article 18 of GDPR, right to erasure of personal data subject to art. 17 of GDPR;
- right to object to processing of personal data pursuant to article 21 GDPR and the right to data portability subject to article 20 GDPR;
- right to withdraw your consent to processing in writing or electronically by a message send to the address or e-mail of the Controller indicated in article III herein.

You also have a right to lodge a complaint with the Czech Office for Personal Data Protection, if you believe that your right to personal data protection was violated.

VII. Personal Data Security Policy

The Controller hereby declares that he has implemented all required technical and organizational measures to secure personal data. The Controller implemented technical measures to secure digital data storage and the storage of hardcopies of personal data, especially by means of secure / encoded internet access, encoded passwords of customers in the database, regular system updates, regular backup copies of the system. The Controller hereby declares that only persons authorized thereby have access to personal data.

VIII. Final Provisions

By sending the online inquiry form you confirm that you have read the Personal Data Protection Policy and that you accept it in full scope.

To accept the Policy you have to check the consent box in the online form. By checking the online inquiry form you confirm that you have read the Personal Data Protection Policy and that you accept it in full scope.

The Controller reserves the right to change this policy. The Controller shall publish the new version of the Personal Data Protection Policy on his website and at the same time he will send the new version hereof to the e-mail address you provided.

The policy becomes effective as of 25 May 2018.