

**PRIVACY AND DATA PROTECTION NOTICE FOR HOTEL ESTABLISHMENTS WITHIN COMPANIES BELONGING TO THE TMR GROUP  
CHALETS JASNÁ COLLECTION\*\*\*\*,**

**Tatry mountain resorts, a.s., Demänovská Dolina 72, 031 01 Liptovský Mikuláš, IČO: 31 560 636  
IČ DPH: SK2020428036, registered at Commercial Registry of District Court Žilina, section: Sa, file n.: 62/L  
(hereinafter referred to as „Notice“)**

**GOPASS, a.s.**, headquarters: Demänovská Dolina 72, 031 01 Liptovský Mikuláš, IČO: 53 824 466, IČ DPH: SK2121518487, registered at Commercial Registry of District Court Žilina, section: Sa, file n.: 11039/L, is, together with other property, personnel or otherwise affiliated or connected companies, a joint controller in the processing of personal data within the TMR Group.

Members of TMR Group, which are joint controllers based on the agreement on joint controllers concluded on 25.05.2018 and its subsequent amendments:

Main controller: **GOPASS, a.s.** – loyalty program Gopass

Demänovská Dolina 72, 031 01 Liptovský Mikuláš IČO: 53 824 466 IČ DPH: SK2121518487, registered at Commercial Registry of District Court Žilina, section: Sa, file n.: 11039/L

**Tatry mountain resorts, a.s.** – Ski Resorts Tatranská Lomnica, Štrbské pleso, Jasná, Hotel Village Tatralandia, Hotel Pošta, Hotel Grand Jasná, Chalets Jasná Collection Záhradky, Hotel Srdiečko, Hotel Tri Studničky, Hotel Rotunda - Noc na Chopku, Bungalows FIS Economy, Hotel SKI, Apartmány Horec, Grandhotel Praha, Grandhotel Starý Smokovec, Hotel FIS, Noc na Lomnickom štíte

Demänovská Dolina 72, 031 01 Liptovský Mikuláš IČO: 31 560 636 IČ DPH: SK2020428036, registered at Commercial Registry of District Court Žilina section: Sa, file n.: 62/L

**EUROCOM Investment, s.r.o.** – Hotel Galléria Thermal Bešeňová, Hotel Akvamarín Bešeňová, Hotel Bešeňová,

Bešeňová 136, 034 83 Bešeňová IČO: 35 756 985 IČ DPH: SK2021394969, registered at Commercial Registry of District Court Žilina section: Sro , file n. 14558/L

**MELIDA, a.s.** Skiareál Špindl

Špindlerův Mlýn 281, 543 51 Špindlerův Mlýn, Czech Republic IČO: 241 66 511 DIČ: CZ24166511 registered at Commercial Registry of Regional court Hradec Králové, section: B, file n. 3175

**SZCZYRKOWSKI OŚRODEK NARCIARSKI S.A** – Hotel GRONIE

Narciarska 10, 43-370 Szczyrk, Poland, IČO/Regon: 072818322 registered at National Court Register of Regional Court Bielsko-Białe číslo KRS: 0000140818

**SLASKIE WESOŁE MIASTECZKO SPÓŁKA Z OGRANICZONA ODPOWIEDZIALNOSCIA** – theme park LEGENDIA

ul. PLAC ATRAKCJI, nr.1 , 41 501 Chorzow, Poland, IČO/Regon: 243516267, Registered at National Court Register of Regional Court Katowice-Wschod in Katowice, KRS n.: 0000499958

**MÖLLTALER GLETSCHERBAHNEN GMBH & CO KG & HOCHGEBIRGSBAHNEN ANKOGEL** – Ski areal Ankogel and MÖLLTALER GLETSCHERBAHNEN

Talstation, Innerfragrant 46, 9831 Flattach Firmenbuchnummer 19797p, Company reg. No.: FN 19797 p VAT reg. No.: AT U33329902

**Tatry mountain resorts CR, a.s.** – Hotel Kaskáda, Green Inn Hotel, Golf Resort Olomouc, Golf & SKI Ostravice, Golf Kaskáda

House n. 75, 739 14 Ostravice, Czech Republic, IČO/Regon: 06871917, DIČ: CZ06871917, registered at Commercial Registry of Regional court Prague: File mark: B 23258,

**TMR Ještěd, a.s.** – Skiareál Jěštěd

Jablonecká 41/27, Liberec V-Kristiánov, 460 05 Liberec, Czech Republic, IČO/Regon: 06080413, DIČ: CZ06080413, registered at Commercial Registry of Regional court Ústí nad Labem: File mark: B 2685

### **Muttereralm Bergbahnen Errichtungs GmbH – Ski areal Muttereralm**

Nockhofweg 40, 6162 Mutters, Austria, Firmenbuchnummer: 270746g, VAT reg. No.: ATU62238929

### **Privacy and Data Protection Notice TMR Group – customers**

This Notice applies to you and your personal data because you are a customer of an entity within the TMR Group. Our company acts as a controller when processing your personal data. For the purposes of this Notice, the TMR Group entity with which you have a contract or loyalty program membership (controller) is responsible for the protection of your personal data. This notice explains how we will use personal data that we receive from you or third parties (e.g., from a travel agency or your employer) during your contractual relationship with a company within the TMR GROUP.

<b>Objective of processing</b>	<b>Categories of personal data</b>	<b>Purpose and legal basis for processing</b>	<b>Retention period</b>
Fulfillment of pre-contractual relations	<b>Personal contact details.</b> For example, your name, surname, address of permanent residence, correspondence address, email address, contact telephone number, ID n., social security n., academic degree, date of birth, <b>Work contact details.</b> For example, the address of the company you represent,	<b>Customer administration.</b> We keep personal records on all of our customers, and the services provided for them. Based on the analysis of our records, we also make strategic decisions on our customer offers. The legal basis is the contract concluded between us and the legitimate interest of the controller.	<b>Until the reserved or ordered service is used, or 30 days after expiration.</b>

	work email address and phone number.		
Purchase of real estate	<b>Personal contact details.</b> For example, your name, surname, maiden name, address of permanent residence, correspondence address, email address, phone number, ID n., identity number, academic degree,	<b>Customer administration.</b> We keep personal records of all our customers and the services provided for them. Based on the analysis of our records, we also make strategic decisions on our customer offers. The legal basis is the contract concluded between us and the fulfillment of a legal obligation, in particular Act n. 162/1995 Z. z.	<b>Until the end of the current year and the next 10 years</b>
Guest accommodation	<b>Personal contact details.</b> For example, your name, surname, address of permanent residence, correspondence address, email address, contact telephone number, ID n., social security n., academic degree, date of birth, vehicle registration number in case of ordering parking, <b>Work contact details.</b> For example, the address of the company you represent, work email address and phone number. <b>Information about family members and relatives.</b> For the purposes of inclusion in privileged customer groups. <b>Payment information.</b> For example, bank account number and amount of charged services	<b>Provision of accommodation services.</b> We must ensure the registration of accommodated guests in accordance with special regulations. The legal basis is the fulfillment of the legal obligation of the controller and the fulfillment of the contract concluded between us. <b>Taxes and accounting.</b> For the purpose of fulfilling the obligations arising from the tax law and other regulations connected with contractual monetary performance, we are obliged to process certain personal data. The legal basis is the fulfillment of legal obligations. <b>Resolution of disputes and investigation of offences.</b> We may process personal data for the purposes of resolving disputes, complaints, or legal proceedings, or if we suspect an offense that we would like to investigate further.	<b>4 years</b>  <b>The current year and the next 10 years</b>  <b>The current year and the next 10 years</b>  <b>4 years maximum, but in</b>

		<p>The legal basis is the fulfillment of legal obligations and the legitimate interest of the controller.</p> <p><b>Compliance with the law.</b> We may need to process your personal data to comply with the law (e.g. matching your name with names on so-called designated party lists and complying with the Money Laundering Act, legal cooperation, etc.) or to comply with a court order.</p>	<b>justified cases according to special regulations 10 years</b>
On-site payment confirmation	<p><b>Identifying data:</b> Name, surname, room number, name of the facility, signature, <b>Fiscal receipt.</b> We indicate your first and last name, or room number on the receipts so that you could check on the attribution of points.</p>	<p><b>Verification of fulfillment of contractual obligations.</b> We can verify it through documents such as fiscal receipt, GOPASS, and personal zone. You can verify that points have been redeemed. The legal basis for this processing is a legitimate interest of the controller, in combination with the fulfillment of the contract concluded between us.</p>	<b>The current year and the next 10 years</b>
Preparation of gift vouchers	<p><b>Gift vouchers.</b> Identification of the donor, and recipient, along with the subject of the gift and dedication of the donor to the recipient, to the extent necessary to fulfill the purpose of processing.</p>	<p><b>Gift vouchers.</b> We have to process your and the recipient's identification data, in case you decide to buy one of our products or services as a gift (the necessary extent of the processing could differentiate).</p> <p>Our company processes the personal data of the gift voucher holder for the purpose of checking the eligibility for using the services provided by the controller in the</p>	<b>12 months</b>

		<p>controller's resorts and/or in the Chalets Jasná Collection**** resort, to which the gift voucher is issued. Personal data is processed for the time necessary to fulfill the purpose of processing - checking the eligibility of services provided by the controller in the controller's resorts and/or in the Chalets Jasná Collection**** resort, for which the gift voucher is issued. The legal basis is the contract concluded between us, and the legitimate interest of our company, together with the recipient's expectation.</p>	
Complaint procedure	<p>Name, surname, address of permanent residence, contact telephone number, e-mail address, subject of the complaint, date of and resolution along with the method of resolution of the complaint.</p>	<p><b>Taxes and accounting.</b> We are obliged to process certain personal data to fulfill the obligations arising from the Tax Act and other regulations connected with financial performance. The legal basis is the fulfillment of legal obligations.</p>	<b>4 years</b>
Return of forgotten assets - Lost and found	<p>Name, surname, address of permanent residence, contact telephone number, ID number, forgotten assets (for example wallets, clothes, bags, or electronics forgotten inside of our facilities, especially hotels or on cable cars, etc..).</p>	<p><b>Lost and found.</b> If you forget your belongings in one of our facilities, we will be happy to hand them over to you upon request. However, for this purpose, we need to verify your identity and record to whom we have given these forgotten items. The legal basis is the legitimate interest of our company.</p>	<b>12 months</b>

<p>Security monitoring</p>	<p><b>Safety information.</b> For example your access card number, information about whether you are in the building and CCTV recordings, monitoring by camera system in our facilities. <b>Your likeness and behaviour or performance of activities in our facilities.</b> We will implement active access to the recording only after a recorded security incident.</p>	<p><b>Security and threats to networks, and operations.</b> We check the functionality, security, and stability of the operation of our network, of which you are a participant. The legal basis is the fulfillment of legal obligations and the legitimate interest of the controller. The legal basis is also the fulfillment of the contract concluded between the controller and the affected person, and the legitimate interest of the controller.</p> <p><b>Resolution of disputes and investigation of offences.</b> We may process personal data for the purposes of resolving disputes, complaints or legal proceedings, or if we suspect an offence, that we would like to investigate further. The legal basis is the fulfillment of legal obligations and the legitimate interest of the controller.</p> <p><b>Monitoring by camera system in our facilities.</b> Control of adherence to security protocol, and protection of rights and legitimate interests of the controller. All areas with CCTV monitoring are properly marked with a pictogram, the logo of the controller, and an address containing all information about the processing of personal data. The legal basis is the legitimate interest of our company. Unless</p>	<p><b>30 days</b></p>
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		we have a legal obligation to keep such data, we will delete it after 15 days.	
Marketing	Recordings of our events, provision of information about the conditions for your trip destination, organization of contests, registration data, room number, and contact. In the case of providing Wellness services, we also need special category data concerning your health.	<p><b>Popularization of our company and operated services.</b> If you do not object, we can publish your image on our communication channels as part of the promotion of our company when using our services, e.g. in ski or snowboard schools. In the case of processing the personal data of children, parents will also be informed about this activity. We carefully select all images so that they are not mocking or derogatory in nature. The realization of these activities is based on the legitimate interest of our company as the controller.</p> <p><b>Consumer competitions.</b> We will process your personal data for this purpose to the extent necessary for the registration and realization of the competition. The legal basis of the processing is the contract between us, based on which you accept the terms of the competition, with corresponding rights, and obligations.</p> <p><b>Information about the weather and operation of the facilities:</b> The morning newsletter contains information about the operational conditions and weather in our resorts. The legal basis is the consent you</p>	<p><b>5 years</b></p> <p><b>3 years and in the case of winnings and tax obligation fulfillment, 10 years</b></p> <p><b>During the guest's stay</b></p> <p><b>12 months</b></p>



		<p>have given us, and the legitimate interest associated with your expectation.</p> <p><b>Sports events and competitions.</b> We will process your personal data for this purpose to the extent necessary for the implementation and registration of the event or competition. It is possible that, in addition to this data, we will promote this event or competition, and we will take a picture or film report from it, which we will publish through our communication channels to popularize sports, nature, the country, the event, and the resort in which it was held. The legal basis of the processing is the contract concluded between us, based on which you accept the terms of the competition, with corresponding rights, and obligations.</p>	
Marketing	Email address of the accommodated guest	<p><b>Direct marketing.</b> We deal with the development of our customers and tailor-made offers for them. The legal basis is the legitimate interest (newsletter), and the consent granted to us.</p> <p><b>Data sharing within the TMR Group.</b> Your data will be provided to the necessary extent of the services to the companies within TMR Group, so they do not contact you with the offer of services, that you have already purchased from us. It also facilitates the use of the benefits of</p>	<p><b>2 years</b></p> <p><b>2 years</b></p>

		the entire TMR Group as joint controllers. The legal basis is the fulfillment of legal obligations and the legitimate interest of the controller.	
Marketing	Data was obtained based on the consent you have given us during your stay.	<b>Marketing consents.</b> Other data may also be used, but only based on special consents that we will request from you in advance. The legal basis is the consent we obtained from you.	<b>For the duration of the consent</b>
Special COVID 19 regime	Name, surname, date, and name of the visited facility.	According to the currently valid decree of the Office of Public Health of the Slovak Republic, various restrictions or measures affecting our services could be enacted. More information could be found in the Decree in question. The legal basis is the fulfillment of a legal obligation.	<b>According to the valid decree</b>

### **Location of your personal information**

Your personal data will be placed exclusively within the borders of the European Union and the European Economic Area. During the processing of personal data, our company may perform processing operations, that include the cross-border transfer of provided personal data abroad within the member states of the European Union, or access to this data from abroad through remote access due to the administration of the information system by an intermediary based in this country. During the transfer, the company ensures the maximum protection of personal data by encryption, and the use of software and hardware tools to secure the transferred data. Your data may also be published through our communication channels and social media, but you will always be notified of this fact in advance, and you have the right to object to such processing.

In the case of real estate sales, the data will be submitted to the relevant Cadastre Administration and other public administration bodies.

## **DATA SUBJECT RIGHTS**

It is important that you understand that it is your personal data that we are processing and that we want you to understand this. Although we do not need your permission to process your personal data, you have many rights in relation to the processing of your personal data.

### **Your rights**

Right to access

### **What does it mean?**

You can request information about how we process your personal data, including information about it:

- Why we process your personal data
- What categories of personal data do we process
- With whom we share your personal data
- How long do we keep your personal data or what are the criteria for determining this period
- What rights do you have
- Where we get your personal data from (if we didn't get it from you)
- If the processing includes automated decision-making (so-called profiling)
- If your personal data has been transferred to a country outside the EEA, how will we ensure the protection of your personal data.

All the above information is available in this Privacy Notice.

You can also request a copy of the personal data we process about you. However, additional copies will be charged with an administration fee.

Right to rectification

It is important that we have correct information about you, and we ask that you notify us if any of your personal information is incorrect, e.g. if you have changed your name or if you have moved.

Right to erasure

If we unlawfully process your personal data, for example, if we process your personal data for longer than necessary or without reason, you can ask us to delete that data.

Right to restriction of

From the moment you have requested the rectification of your personal data, or if you have objected to the

processing	processing, until we are able to investigate the problem or confirm the accuracy of your personal data (or change it according to your instructions), you are entitled to limited processing. This means that we (except for the retention of personal data) may only process your personal data in accordance with your consent, if it is necessary for legal claims, to protect the rights of someone else, or if there is a significant public interest in the processing. You can also request that we restrict the processing of your personal data if the processing is unlawful, but you do not want us to delete the personal data.
Right to object	If you believe that we do not have the right to process your personal data, you can object to our processing. In such cases, we can only continue processing if we can demonstrate compelling legitimate reasons that outweigh your interests, rights and freedoms. However, we may always process your personal data if it is necessary to determine, exercise or defend legal claims.
Right to data transfer	You may request that your personal data, which you have provided to us for processing based on consent or to fulfill a contract, be provided to you in a structured, commonly used, and machine-readable format. You also have the right to request the transfer of this information to another data controller.
Withdrawal of consent	You have the right to withdraw your consent and we will subsequently stop our processing activities based on this legal reason.

We will also inform other parties to whom we may have provided your personal data about your request/s.

In case of doubt, you have the right to submit a proposal to initiate proceedings pursuant to § 100 of the Personal Data Protection Act to the relevant supervisory authority. [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk)

### **How can I complain about the usage of my data or how can I exercise my rights??**

If you want to file a complaint about how we process your personal data, including in relation to the aforementioned rights, you can contact our Data Protection Officer ("DPO") and your suggestions and requests will be verified.

Contact the person responsible for supervising the protection of personal data: [privacy@tmr.sk](mailto:privacy@tmr.sk).

If you are not satisfied with our answer, or if you believe that we process your data unfairly or illegally, you may complain to the relevant supervisory authority, which is the Personal Data Protection Office (ÚOOÚ). You can find more information about ÚOOÚ and their procedure for submitting complaints here: [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).

### **Contact details**

If you have any further questions regarding the processing of your personal data, you can contact us through our Data Protection Officer (DPO), by email at [privacy@tmr.sk](mailto:privacy@tmr.sk).

**More information can be found at:** [zasady-ochrany-sukromia-a-spracovania-osobnych-tmr-group-20211030-002.pdf](#)