# PRIVACY POLICY

## Apartmány U Kostela

*Effective as of 1 October 2026*

This Privacy Policy governs how personal data of website visitors, prospective guests, guests and other individuals who use the services of Apartmány U Kostela is processed.

Personal data is processed in accordance with applicable legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR") and the relevant legislation of the Czech Republic.

## 1. Data Controller

The data controller is:

Dopega s. r. o.
Represented by Petr Bubanec

Company ID: 17116287

VAT ID: CZ17116287

Registered office / place of business: Na Vyhlídce 2517/33, 350 02 Cheb, Czech Republic

Email: apartmanycheb@seznam.cz

Telephone: 604 74 24 83, 603 53 19 19

Website: apartmanyukostela.eu

(hereinafter referred to as the "Controller").

The Controller determines the purposes and means of processing personal data and is responsible for ensuring that such processing complies with applicable legislation.

## 2. What Personal Data We Process

Depending on how you communicate with us or use our services, we may process the following personal data in particular:

- First and last name;
- Residential address or other contact address;
- Email address;
- Telephone number;
- Reservation and stay details;
- Information required for issuing accounting and tax documents;
- Information necessary to fulfil the accommodation provider's statutory obligations;
- Information contained in communications between the guest and the Controller;
- Information about requirements and preferences relating to the stay, where voluntarily provided by the guest;
- Payment-related information, where necessary to process a reservation or payment;
- Technical information about the use of the website, particularly IP address, device type, operating system, browser type and data obtained through cookies.

The Controller processes only data that is adequate, relevant and necessary for the specific purpose of processing.

## 3. Purposes of Personal Data Processing

We process personal data primarily for the following purposes:

### a) Processing Reservations and Providing Accommodation

We process personal data for the purposes of:

- Receiving and confirming reservations;
- Communicating before arrival and during the stay;
- Arranging access to the accommodation facility;
- Organising the stay;
- Handling guest requests;
- Issuing documents and processing payments.

The legal basis is primarily the performance of a contract or taking steps prior to entering into a contract, pursuant to Article 6(1)(b) of the GDPR.

### b) Compliance with Legal Obligations

We must process certain personal data because we are required to do so by law.

These obligations relate in particular to:

- Keeping records of accommodated guests;
- Obligations towards public authorities;
- Recording and collecting local fees;
- Accounting and tax obligations;
- Possible inspections and other statutory obligations of the accommodation operator.

The legal basis is compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR.

### c) Customer Communication and Handling Enquiries

We may process personal data when communicating by email, telephone, contact form or other communication channels, particularly for the purposes of:

- Responding to enquiries;
- Preparing accommodation offers;
- Communicating about reservations;
- Handling comments, claims and complaints.

Depending on the circumstances, the legal basis may be the performance of a contract, taking steps prior to entering into a contract, or the Controller's legitimate interests.

### d) Protection of the Controller's Rights and Legitimate Interests

We may also process personal data to the extent necessary for the following purposes:

- Protecting our property;
- Preventing and addressing fraudulent activities;
- Protecting ourselves against unjustified claims;
- Recovering outstanding debts;
- Handling claims and disputes;
- Protecting the Controller's rights in potential judicial, administrative or other proceedings.

The legal basis is the Controller's legitimate interests pursuant to Article 6(1)(f) of the GDPR.

### e) Marketing Communications

If you give us the relevant consent, we may also use your personal data to send you commercial communications and information about our services.

Consent is voluntary and may be withdrawn at any time.

Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

## 4. Reservation Systems and Accommodation Intermediaries

Accommodation reservations may be made directly with the Controller or through external reservation and accommodation platforms.

Where a reservation is made through a third party, personal data may also be processed by the operator of the relevant platform in accordance with its own privacy policy.

For reservation management and accommodation administration, the Controller may also use specialised systems and service providers, such as the Previo reservation system or tools for guest communication and service automation.

Where a particular service provider acts as a personal data processor, the Controller ensures that personal data processing complies with the requirements of the GDPR.

## 5. Who May Have Access to Personal Data

Personal data may be disclosed to the extent necessary, in particular, to:

- Reservation system providers;
- IT and web hosting service providers;
- Accounting and tax service providers;
- Payment service providers;
- Providers of services related to the operation of the accommodation facility;
- Public authorities, where disclosure is required by law;
- Legal, accounting or other professional advisers, where necessary to protect the Controller's rights.

Personal data is not sold to third parties.

## 6. Transfers of Personal Data to Third Countries

The Controller endeavours to use service providers who ensure that personal data is processed within the European Economic Area.

If any service provider used by the Controller processes personal data outside the European Economic Area, such transfers will take place only in compliance with the requirements of the GDPR, particularly on the basis of an adequacy decision or appropriate safeguards provided for by the GDPR.

## 7. Retention Periods for Personal Data

We retain personal data only for as long as necessary to fulfil the purpose for which it was collected, or for the period required by applicable legislation.

Retention periods therefore vary depending on the specific purpose, in particular:

- Reservation and stay information is retained for as long as necessary to process the reservation and subsequently for the period required to protect our rights and fulfil our legal obligations;
- Accounting and tax documents are retained for the periods stipulated by the relevant legislation;
- Information necessary for keeping records of accommodated guests is retained for the periods stipulated by the relevant legislation;
- Communications and information relating to any claim or dispute are retained for as long as necessary to resolve the matter and subsequently to protect the Controller's rights;
- Personal data processed on the basis of consent for marketing purposes is retained until consent is withdrawn or for a period appropriate to the relevant purpose.

After the relevant retention period has expired, we will delete or anonymise personal data unless another legal basis exists for retaining it.

## 8. Cookies

The website apartmanyukostela.eu may use cookies and similar technologies.

Cookies may be used in particular to:

- Ensure the proper functioning of the website;
- Remember user settings;
- Ensure security;
- Collect statistical information about website traffic;
- Support marketing and personalisation purposes, where applicable.

### Technically Necessary Cookies

Technically necessary cookies may be used without prior consent where they are essential for providing a service explicitly requested by the user.

### Analytical and Marketing Cookies

If the website uses analytical, marketing, personalisation or other non-essential cookies that require consent, these cookies will only be used after the visitor has given the relevant consent.

Visitors must be able to refuse consent and withdraw their consent at a later date.

Specific cookie settings can be changed using the cookie management tool available on the website.

## 9. Security of Personal Data

The Controller implements appropriate technical and organisational measures to protect personal data against:

- Unauthorised access;
- Unauthorised or unlawful processing;
- Accidental loss;
- Destruction;
- Damage or disclosure to unauthorised persons.

Personal data is accessible only to persons who need it to perform their duties and only to the extent necessary for the relevant purpose.

## 10. Data Subject Rights

In connection with the processing of personal data, you have the following rights under the GDPR, in particular:

### Right to Information

You have the right to obtain information about whether and how we process your personal data.

### Right of Access

You have the right to request confirmation as to whether we process your personal data and, if so, to obtain access to that data and further information about its processing.

### Right to Rectification

You have the right to request the correction of inaccurate personal data or the completion of incomplete personal data.

### Right to Erasure

Under the conditions set out in the GDPR, you may request the erasure of your personal data.

This right is not absolute. For example, if we are legally required to retain certain information, we cannot delete it solely on the basis of a request before the applicable statutory retention period has expired.

### Right to Restriction of Processing

Under the conditions set out in the GDPR, you may request the restriction of processing of your personal data.

### Right to Data Portability

Under the conditions set out in the GDPR, you have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format.

### Right to Object

If we process personal data on the basis of legitimate interests, you have the right to object to such processing.

### Right to Withdraw Consent

Where processing is based on your consent, you may withdraw your consent at any time.

Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

## 11. How to Exercise Your Rights

You may submit requests, questions or objections concerning the processing of personal data using the following contact details:

Email: apartmanycheb@seznam.cz

Telephone: 604 74 24 83, 603 53 19 19

We recommend that your request includes your name, contact details for our response and a description of your request.

If we have doubts about the identity of the person making the request, we may ask for additional information necessary to verify their identity.

We respond to requests concerning rights under the GDPR without undue delay, generally no later than one month after receiving the request. In complex or justified cases, this period may be extended in accordance with the GDPR.

## 12. Right to Lodge a Complaint with a Supervisory Authority

If you believe that the processing of your personal data violates applicable legislation, you have the right to lodge a complaint with the supervisory authority.

The supervisory authority in the Czech Republic is:

Office for Personal Data Protection

Pplk. Sochora 27

170 00 Prague 7

Czech Republic

Website: uoou.gov.cz

The right to lodge a complaint with the supervisory authority does not restrict any of your other rights.

## 13. Automated Decision-Making and Profiling

In the ordinary course of providing accommodation services, the Controller does not use personal data for automated individual decision-making that produces legal effects concerning a data subject or similarly significantly affects them.

If automated decision-making or profiling tools are used in the future, information about such processing will be added in accordance with the requirements of the GDPR.

## 14. Personal Data of Children

Our accommodation services may also be used by families with children.

Where a child's personal data is processed for the performance of a contract or compliance with a legal obligation, we process it only to the extent necessary for the relevant purpose.

Where processing is based on consent, we will act in accordance with the applicable requirements of the GDPR and relevant legislation.

## 15. Links to Third-Party Websites

Our website may contain links to third-party websites, such as booking portals or service providers.

Once you visit a third-party website, the processing of personal data is governed by the privacy policy of the relevant operator. We recommend that you familiarise yourself with its privacy policy.

## 16. Updates to This Privacy Policy

We may update this Privacy Policy from time to time, particularly if there are changes to the services or technologies we use, applicable legislation or the way personal data is processed.

The current version of this Privacy Policy is always published on our website:

apartmanyukostela.eu

Last updated: 1 October 2026

Dopega s. r. o.
Petr Bubanec