

Information memorandum

SUNČANI HVAR d.d.



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Information on the processing of personal data of accommodated persons by the Company SUNČANI HVAR d.d.

Introduction

Below you will find information on the processing of your personal data by SUNČANI HVAR d.d., Corporate ID No. 060004796, PIN 29834131149, registered in Commercial court of Split, with its registered office at Ive Miličića 3, 21 450 Hvar (hereinafter the "Company") provided in accordance with 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 (hereinafter the "GDPR") and related applicable data protection legislation.

The Company, as a controller of your personal data, determines the means and purposes of the processing of your personal data as specified below in this document. With regard to the processing of personal data, you can also exercise the below-mentioned rights towards the Company.

You can contact the Company in writing at the address Ive Miličića 3, 21 450 Hvar, Croatia or you can contact the Company's Data Protection Officer via email at dataprotection@suncanihvar.com.

Processing of your personal data

The Company processes your personal data only to the necessary extent and for the period necessary to achieve a specific purpose on a lawful basis.

Below you will find an overview of the purposes for which the Company processes your personal data, including a description of the processing purpose. Each purpose of processing also includes information on:

- Lawful basis for processing of your personal data for the given purpose;
- Extent of processing;
- Source of the personal data;
- Information on who can obtain access to your personal data; and
- Information on how long the Company will store your personal data.

In case your personal data are processed on the lawful basis of legitimate interest of the Company or a third party, information on the nature of this legitimate interest is also included.

Purpose of the processing	Provision of services
Description of the purpose of the processing	Provision of hotel accommodation and related services in company facilities
Lawful basis	Agreement; Legal obligation;
Category of personal data	Name, surname, permanent residence, e-mail address, duration and purpose of stay, date of birth, travel document No., PIN, Citizenship, payment details;
Source of personal data	By fulfilling a Registration form
Recipients of personal data	Public authorities (settlement of local fees, registration of foreign citizens)
Storage period of personal data	2 years

Purpose of the processing	Marketing
Description of the purpose of the processing	personal data being used for marketing purposes, including sending commercial and marketing offers and notices
Lawful basis	Consent
Category of personal data	Name, surname, permanent residence, e-mail address;
Source of personal data	By fulfilling a Registration form
Recipients of personal data	-
Storage period of personal data	-

Transfers of your personal data to third countries or international organisations

The Company or the recipients to which the Company gives access to your personal data for the above stated purposes *will not transfer your personal data to any third countries or international organisations.*

Automated decision-making

An automated decision is a decision made by the Company or a recipient to which the Company gives access to your personal data for the above stated purpose, that is based solely on automated processing of your personal data (including profiling) and that produces legal effects concerning you or similarly significantly affects you.

The Company or the recipients to which the Company gives access to your personal data for the above stated purposes *will not use your personal data for automated decision-making.*

What are your rights with respect to the processing of personal data?

With respect to the processing of your personal data by the Company, you can request the Company:

- To give you access to your personal data, whereby you can obtain, in particular, information whether your personal data are processed, for what purpose, what is the scope of processed data and who has been given access to your personal data, if relevant. You can also be provided with a copy of your personal data undergoing processing;
- To rectify inaccurate or incorrect data or to complete incomplete personal data;
- To erase the personal data, e.g. if the purpose of processing ceases to apply or if your personal data are processed unlawfully;
- To restrict the processing of your personal data;
- To data portability, which allows you to obtain personal data concerning you, which you have provided to the Company, in a structured and machine-readable format either for yourself or for another controller; and
- To make sure that you are not subject to any automated decision-making (you found out whether such decision-making takes place or not in the preceding chapter).

You can also raise an objection against the processing of your personal data, should the processing of your personal data be based on the lawful basis of legitimate interest, or to lodge

a complaint with the Croatian Personal Data Protection Agency. The contact details are as follows:

Croatian Personal Data Protection Agency

Fra Grge Martića 14
HR - 10 000 Zagreb
tel.: +385 (0)1 4609-000
<http://azop.hr/>

How you can exercise your rights?

You can request the exercise of your rights via a written or oral request. In order to provide sufficient protection of the personal data processed by the Company and to prevent personal data misuse from taking place, the Company has introduced rules for the verification of your identity stated below.

You may request the exercise of your rights by:

Written request

To request the exercise of the particular right in writing, please fill in the request form available at <https://www.suncanihvar.com/>. Your signature on the request form needs to be officially certified. You may be able to have your signature certified at a notary public office or in case of delivery of request by e-mail you may verify your signature with electronic signature. If a written request is submitted directly to the Company's premises, signature verification is not required, but it is sufficient to personally access it with the presentation of a valid ID.

Oral request

You may also request the exercise of the particular right in person, e.g. in a hotel or office. Your identity will be verified by the Company's designated employee (e.g. at a front desk), based on the submission of one of the following documents: personal ID card, passport or another document with a photo sufficiently eligible to enable your clear identification.

The exercise of your rights shall not affect the rights of third parties.

Please note that should your requests be manifestly unfounded or excessive, in particular because of their repetitive character, the Company may require a reasonable fee, not exceeding the necessary costs of the provision of the above stated information or arranging the exercising of your rights, for the purposes of responding to your request.

Is the provision of your personal data mandatory?

If the Company processes your personal data based on your consent, the processing of such data is voluntary. In this case, you are not required to grant your consent and provide your personal data to the Company.

Your consent to the processing of your personal data must be a freely given, specific, informed and unambiguous expression of your will, whereby you give the Company your permission, in the form of a statement or another evident confirmation, to process your personal data.

The Company may process your personal data based on a different lawful basis, e.g. lawful basis of performance of a contract, of compliance with a legal obligation or for purposes of the legitimate interest. In this situation, provision of your personal data is necessary, because, the Company may need such personal data e.g. to conclude and perform a contract with you or to meet legal obligations. If you decide not to provide the personal data to the Company, it would not be possible to conclude the contract or to fulfil the given legal obligations.

How and when can you withdraw your consent to personal data processing?

You may withdraw the consent you have granted to the Company at any time, even before the end of the period for which it was given.

You may withdraw your consent:

- Electronically via email at dataprotection@suncanihvar.com;
- In writing at the following address:

SUNČANI HVAR d.d.
Ive Miličića 3
21 450 Hvar
Croatia
ATTN: DPO Office

The withdrawal of your consent shall have no impact on the processing of your personal data conducted before the withdrawal.