HERMITAGE HOTEL PRAGUE CHATGPT APP

PRIVACY POLICY

Last Updated: April 27, 2026

1. DATA CONTROLLER

Hermitage Holdings A.S., operating under the Hermitage Hotel Prague brand ("we," "us," or "our"), acts as the Data Controller for the processing of personal data described in this Privacy Policy.

Registered Address
Svobodova 1961/1
128 00 Prague 2
Czech Republic

Privacy Contact
info@hermitageprague.com

2. PRIVACY & PLATFORM RELATIONSHIP

This Privacy Policy explains how personal data is processed when you use the Hermitage Hotel Prague ChatGPT App made available through the OpenAI platform.

This application operates within the OpenAI ecosystem. Accordingly:

- OpenAI is responsible for account creation, authentication, and platform-level processing under its own terms and privacy policy.
- We do not create or manage user accounts and do not have access to your OpenAI credentials.
- We process only the limited data necessary to generate responses through secure API calls.

We are committed to minimizing data collection and maintaining transparency regarding how your information is handled.

3. PERSONAL DATA WE PROCESS

Depending on your interaction with the application, we may process the following categories of personal data:

Identifiers
Including IP address and device-related metadata.

User Content ("Prompts")
Information you voluntarily submit through chat inputs.

Internet Activity Data
Interaction logs, request timestamps, and usage patterns.

Inferred or Aggregated Data
Non-identifiable insights used to improve service performance and reliability.

We recommend that you do not include sensitive, confidential, or special-category personal data in your prompts.

4. SOURCES OF PERSONAL DATA

We collect personal data from the following sources:

Directly From You
Through the content you submit during chat interactions.

Automatically
Through technical metadata generated during use of the application.

From the OpenAI Platform
As part of standard request routing and processing.

5. PURPOSES OF PROCESSING & LEGAL BASES (GDPR)

We process personal data only for the following purposes:

Service Delivery
To generate and return responses requested by the user.
Legal Basis: Article 6(1)(b) GDPR – Performance of a Contract

Security & Fraud Prevention
To protect systems, detect abuse, and maintain platform integrity.
Legal Basis: Article 6(1)(f) GDPR – Legitimate Interests

Service Improvement
To improve performance, reliability, and response quality.
Legal Basis: Article 6(1)(f) GDPR – Legitimate Interests

6. DISCLOSURE OF PERSONAL DATA

We may share personal data with trusted third-party service providers only where necessary to operate the service, including:

- OpenAI – platform infrastructure and processing
- Amadeus Hospitality / TravelClick – hosting and booking infrastructure
- Cloud Hosting Providers – secure infrastructure services
- Security & CDN Providers – network protection and performance

All third-party providers are contractually required to:

- Process data only on our documented instructions
- Maintain appropriate technical and organizational safeguards
- Comply with applicable data protection laws

We do not sell personal data or share personal data for cross-context behavioral advertising.

7. DATA RETENTION

We apply a strict data minimization and limited retention policy.

Chat Data
Processed transiently and not stored in a persistent identifiable format unless necessary for operational or legal purposes.

Technical Logs
Retained for up to 30 days solely for security, fraud prevention, debugging, and operational integrity.

User Profiles
No persistent user profiles are created by us.

8. INTERNATIONAL DATA TRANSFERS

Personal data may be processed in the United States and other jurisdictions where our service providers operate.

Where required by applicable law, we implement appropriate safeguards, including:

- Standard Contractual Clauses (SCCs)

- Additional contractual, technical, and organizational protections

9. COOKIES & TRACKING TECHNOLOGIES

The Hermitage Hotel Prague ChatGPT App does not directly place cookies.

However:

- The OpenAI platform may use cookies for authentication and platform functionality
- Security providers may process IP address information for security and performance purposes

We do not use advertising cookies, tracking cookies, or third-party behavioral advertising technologies.

10. YOUR PRIVACY RIGHTS (GDPR & CCPA)

Depending on your location, you may have the following rights:

- Right of Access
- Right to Rectification
- Right to Erasure
- Right to Restrict Processing
- Right to Object to Processing
- Right to Data Portability
- Right to Non-Discrimination (CCPA)

California residents may also request disclosure regarding categories of personal data collected, disclosed, or shared.

To exercise your rights, please contact:

info@hermitageprague.com

11. AUTOMATED DECISION-MAKING

We do not engage in automated decision-making or profiling that produces legal effects or similarly significant impacts on individuals.

12. CHILDREN'S PRIVACY

This service is not intended for individuals under the age of 16.

We do not knowingly collect personal data from children.

13. SECURITY MEASURES

We maintain appropriate technical and organizational safeguards designed to protect personal data, including:

- Encryption (TLS) for data in transit
- Access controls and authentication mechanisms
- Secure infrastructure through enterprise-grade cloud providers
- Network and security protection through industry-standard security providers

We also require our service providers to maintain equivalent security standards.

14. SUPERVISORY AUTHORITY

You have the right to lodge a complaint with your local data protection authority if you believe your rights under applicable privacy laws have been violated.

15. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time.

Any updates will be reflected by revising the “Last Updated” date at the top of this Privacy Policy. We encourage you to review this policy periodically to stay informed about how we process personal data.