

Personal Data Processing and Protection

The following information reveals which personal data we need, how we process it, and how you can contact us. This information is updated on the regular basis. The information concerning the processing of your personal data is published on our website: www.ruzbachy.sk.

The processing of your personal data complies with the Act No. 18/2018 Coll. on Personal Data Protection, as amended, and 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 related regulations.

Data controller: KÚPELE VYŠNÉ RUŽBACHY, a.s., Vyšné Ružbachy 48, 065 02 Vyšné Ružbachy, Company ID No.: 31714501, e-mail: marketing@ruzbachy.sk (hereinafter referred to as the "We").

Contact data for issues regarding the personal data protection:

Your questions regarding the personal data processing will be answered by the authorised person whom you may contact via an e-mail sent to the e-mail address: marketing@ruzbachy.sk,

or by post: KÚPELE VYŠNÉ RUŽBACHY, a.s., Vyšné Ružbachy 48, 065 02 Vyšné Ružbachy, Company ID No.: 31714501.

The processing method, the extent of the personal data, and the duration of keeping such data differ and depend on the purpose for which it was obtained. More detailed information may be found in the respective sections.

Personal data of clients/patients that is required for the purpose of providing them with the spa care

Data we need:

Contact data and data required for the purpose of providing the medical and spa care:

- First name, surname, academic degree, street and house number, postal code, town/city, date of birth, birth registration number, and telephone contact;
- Data on health (processing operations: Medical Data Agenda, Register of Accommodated Guests, Registry Administration, Accounting Documents, Complaints, Litigations, Requests for Information).

Information and data specified in the Act No. 153/2013 Coll. on the National Health Information System, the numerical code of the health insurance agency and, if required in a particular situation, the facts that are important from the epidemiology point of view.

All personal data is processed based on the special acts on healthcare and is used exclusively for the purpose of the proper provision of the therapeutic spa care, the keeping of medical documentation, and the provision of accommodation and boarding services.

Pursuant to the law, we are obliged to keep your personal data for a period of 20 years after the provision of spa care. The provision of personal data is a precondition for the provision of the therapeutic spa care.

Pursuant to the special acts on the provision of healthcare, your personal data is shared primarily with health insurance agencies and the National Health Information System.

Processors:

Some personal data may be processed, subject to contractual instructions, by the authorised staff of the technical support of our software and IT suppliers.

Accommodation services

Identification and contact data:

First name, surname, academic degree, address, ID Card number, date of birth, place of birth of foreigners, accommodation duration, nationality of foreigners, the purpose of stay of foreigners, the number of passport of foreigners, the number of visa of foreigners, first names and surnames of the children of foreigners, data on the provided accommodation, plate numbers of the parked cars, data on items lost and found, and the signatures of foreigners



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Your personal data is processed in compliance with special acts, in particular the Act No. 253/1998 Coll. on the Registration of the Residence of Citizens of the Slovak Republic and the Register of Inhabitants of the Slovak Republic, and the Act No. 404/2011 Coll. on the Residence of Foreigners, primarily for the following purposes:

- Registration of accommodated guests;
- Registration of accounting documents;
- Processing of declarations of honour;
- References, complaints, and the Book of Suggestions; and
- Registration of parked cars.

Pursuant to the law, we are obliged to keep the data for a period of 10 years after the year in which the accounting documents are issued.

The provision of such data is the precondition for the provision of accommodation services.

As stipulated in the law, your personal data is shared with the Ministry of Interior of the Slovak Republic, the Police Forces of the Slovak Republic, the Municipality Office of Vyšné Ružbachy, as well as other entities specified by law.

Processors:

Some personal data may be processed, subject to contractual instructions, by the authorised staff of the technical support of our software and IT suppliers.

Accommodation services may only be provided to persons aged 18 years or older. Minors may only use the services with the consent of their parents.

Ordering and reservation

Identification and contact data:

- **First name, surname, academic degree, address, telephone contact, e-mail address, reservation data, IP address and the browser installed in the device used, the order date and time.**

Your personal data is processed on the basis of the implementation of the agreement of the provision of services and the precontractual obligations for the following purposes:

- Registration of accommodation reservations;
- **Time management and scheduling of the therapeutic procedures and therapies;**
- **Processing of orders, reservations, orders for prescription stays, etc.; and**
- **Registration of accounting documents.**

We are obliged to keep the provided personal data for a period of 12 months after the date of processing of an order/reservation.

As stipulated in the law, we are obliged to keep the accounting documents for a period of 10 years after the year in which they were issued.

We cannot process any order/reservation without being provided the aforementioned data.

Processors:

Some personal data may be processed, subject to contractual instructions, by the authorised staff of the technical support of our software and IT suppliers.

An order/reservation may only be accepted from a person aged 18 years or older. Minors may only use our services with the consent of their parents.

Newsletter



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Personal data we process:

- **e-mail address, first name, surname, date of birth, IP address and the browser installed in the device used, date of subscription, newsletter opening statistics.**

The aforesaid personal data is processed on the basis of our legitimate interest and your consent. You are entitled to revoke your consent to receiving our newsletter at any time.

We keep the data provided for a period of 10 years after the date of granting your consent or after the last provision of services. The provision of data for the purpose of receiving our newsletter and marketing information is voluntary.

Some personal data may be processed, subject to contractual instructions, by the authorised staff of technical support of our software and IT suppliers and of the provider of marketing services.

Communication

Identification and contact data:

- **First name, surname, academic degree, address, telephone contact, e-mail address, data stated in the documents received and dispatched.**

The aforesaid personal data is processed, on the basis of our legitimate interests, in various manners: via e-mail, by phone, by post, and through social media. The registration of the mail delivered and sent is carried out as stipulated in the law. The data obtained and provided is kept until the subject of the communication is resolved.

As stipulated in the law, the registry of the mail delivered and sent is kept for a period of 10 years after the year in which it was resolved. After the mandatory period elapses, the data provided is erased.

Some personal data may be processed, subject to contractual instructions, by the authorised staff of technical support of our software and IT suppliers and of the provider of marketing services.

Camera system and security monitoring

Personal data also include a video recording in which persons may be identified.

The monitoring by a camera system with video recordings is carried out on the basis of our legitimate interest, primarily for the safety reasons and for the reason of protecting our property.

The monitored areas of the spa resort are designated as stipulated in the law and in respective guidelines.

Video recordings are kept for a period of 14 days of the recording date.

Video recordings are only shared as prescribed by a special act, primarily with courts and law enforcement authorities.



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Recording of telephone communication

Identification and contact data:

- **First name, surname, academic degree, address, telephone contact, e-mail address, phone number**

Phone calls are only recorded on the basis of our legitimate interest, for the purpose of increasing the quality of our services, exercising claims, and the registration of communication.

Such recordings are kept for a period of 3 months after the recording date.

The provision of data is voluntary.

Some personal data may be processed, subject to contractual instructions, by the authorised staff of the technical support of our software and IT suppliers and of the provider of marketing services.

Making photos and promotion videos

Personal data also include photographs, video recordings, and group photos made during events.

Promotion materials are created continuously on the basis of the legitimate interest of our company.

The provision of such data is voluntary and you may object to it.

Such data is kept for a period of 5 years.

The provision of such data is voluntary and has no effect on the provision of other services.

Some personal data may be processed, subject to contractual instructions, by the authorised staff of technical support of our software and IT suppliers, a photographer, a supplier of graphical and printed materials, and a provider of marketing services.

Such data may be published on our websites, in social media, and in marketing materials.

Personal data of job applicants

Identification and personal data:

- **First name, surname, academic degree, education level achieved, experience gained, e-mail, telephone contact, address.**

Personal data is processed in compliance with the law and the rules applicable to the registry administration.

Rights of data subjects are specified in Sections 19–28 of the Personal Data Protection Act, and our company has committed to respecting those rights.

Data subjects have the right to obtain from the controller a confirmation as to whether or not personal data concerning them are being processed.

Where personal data is transferred to a third country or to an international organisation, data subjects have the right to be informed of the appropriate safeguard, as specified in Section 48(2–4) of the Personal Data Protection Act.

The controller is obliged to provide data subjects with their personal data that is subject to the processing.



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Data subjects have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning them. While taking into account the purpose of the processing of personal data, data subjects have the right to have the incomplete personal data completed.

Data subjects have the right to obtain from the controller the erasure of personal data concerning them without undue delay.

Data subjects have the right to obtain from the controller restriction of the processing of personal data, unless the controller proves the necessity of the purpose of processing such data.

Data subjects have the right to obtain the personal data relating to them which was provided by them to the controller.

Data subjects have the right to object to the processing of personal data.

Data subjects have the right to object to being subject to a decision which is based solely on the automated personal data processing, including the profiling, and which has the legal effects that concern the data subjects or have similar significant effects on them.

Method of exercising your rights

You may exercise your rights by sending a written request by post to the following address:

KÚPELE VYŠNÉ RUŽBACHY, a.s.

Vyšné Ružbachy 48

065 02 Vyšné Ružbachy

or via an e-mail sent to the e-mail address: marketing@ruzbachy.sk. Information on personal data is provided without undue delay and free of charge. If you believe that the processing of your data is in conflict with these conditions or the applicable law, you may send your complaint to the supervisory body: The Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27; e-mail: statny.dozor@pdp.gov.sk

Principle of Accountability (Section 12 of the Personal Data Protection Act)

Every employee who processes personal data is accountable for the security of personal data by protecting such data from theft, loss, damage, destruction, making it accessible to unauthorised persons, modification or distribution (publishing).

Employees who come into contact with personal data during the performance of their occupational duties are accountable for the security of such personal data, in particular by protecting the data from distribution, unauthorised access, loss, and theft.

Processing of personal data by our company will be conducted in a legal manner, in particular by ensuring that it is based on at least one of the following legal grounds:

- a) The data subject has granted their consent to the processing of their personal data for at least one specific purpose;
- b) Processing of personal data is required for the purpose of the implementation of a contract to which the data subject is the contracting party or for the purpose of implementing a precontractual action requested by the data subject;
- c) Processing of personal data is required on the basis of a special regulation or an international agreement under which the Slovak Republic is the party obliged;
- d) Processing of personal data is required for the purpose of protecting life, health, of property of the data subject or any other natural person;



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- e) Processing of personal data is required for the purpose of the execution of a task that is to be executed in the public interest or within the exercise of official authority entrusted to the controller; or
- f) Processing of personal data is required for the purpose of legitimate interests of the controller or a third party, excluding the cases in which the interests or rights of the data subject that require protection of personal data override the interest of the controller, especially in the cases where the data subject is a child; such a legal ground does not apply to the processing of personal data by public authorities within the performance of their obligations. The company processes personal data in the manner that ensures that the processing and registration of such data is adequate, relevant, and limited to the necessary extent only, as determined by the purpose for which it is processed.



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