

## Privacy Policy of BELLA HOTELS

### Who are we?

Limited Liability Company "BONATE", registration number: 40203100364, legal address: Piena iela 13, Riga, LV-1045.

### Your privacy and trust is important for us

Our aim is to inform you as clearly and understandably as possible about how and why we use your personal information.

Our objective is to make you feel safe when you disclose to us your personal data. Personal data is any information that can be used to identify the individual.

We perform appropriate actions to ensure that your personal data at us always are safe and that the processing of your personal data would take place in accordance with the effective data protection laws and regulations and our internal procedures.

For us it is important that we are transparent while processing your personal data.

We have undertake to protect your personal information and observe confidentiality in everything we are doing. This Policy allows you to get to know which data we can obtain about you, how we will be using them and provide information about your rights and the way how you can contact us. Sometimes we have to alter our Privacy Policy. In this site all changes will be published which, of course, are available to you at any time.

### What are the categories of persons the data of whom we collect and why?

#### - Provision of hotel services

We process your personal data in order to provide to you hotel services, including provision of overnight accommodation. If you do not submit to us the necessary personal data, you will not be able to receive our services. The duties of hotels stipulated in law are binding for us, including the duty to identify our client, namely, we are obligated to determine whether you are the person which you claim to be. The personal data from the registration questionnaires of clients we store 3 years.

<b>Categories of personal data</b>	<b>Legitimate basis</b>
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<ul style="list-style-type: none"> <li>- Personal information (name, surname, personal identification code or date of birth, citizenship or nationality))</li>   <li>- Contact information (address, phone number)</li>   <li>- Payment information if you perform a payment by bank transfer (number and validity term of the payment card)</li>   <li>- Other information for provision of the hotel services (for example, registration number of the car if the hotel offers the service of car parking and you use it)</li> </ul>	<p style="text-align: center;">Ensuring of the service</p>
<ul style="list-style-type: none"> <li>- E-mail address</li> </ul>	<p style="text-align: center;">Your consent</p>
<ul style="list-style-type: none"> <li>- Data of the document attesting the person (passport or identity card)</li> </ul>	<p style="text-align: center;">Our legal duty to identify clients</p>

By using our services you confirm that the personal data indicated by you are precise and correct and that you have reached the age of at least 18 years. We cannot guarantee provision of services, if you submit inaccurate data.

**- Video surveillance**

We perform video surveillance and process your personal data when you are in the territory of our hotel for the purposes of your personal safety and also for the safety of our employees, clients and property. The records of the video surveillance are stored in our systems up to 30 days.

<b>Categories of personal data</b>	<b>Legitimate basis</b>

<p>- Biometry data (picture of face)</p>	<p>Our legitimate interest</p> <p>Protection of the vital interests of our employees, including protection of health and life.</p>
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**- Advertising/ informative materials**

After your consent we inform you about various news and current developments of us and third parties which we supply as advertising and informative materials.

<p><b>Categories of personal data</b></p>	<p><b>Legitimate basis</b></p>
<p>- Personal information (name, surname)</p> <p>- Contact information (address of the place of residence, e-mail address, mobile phone number)</p>	<p>Your consent</p>

**- Cookies**

Cookies are small text files which are created and stored into your device as the internet user (computer, tablet, mobile phone etc.) when you visit our website. The cookies “remember” you experience and basic information and thus improve the convenience of use for our website. By using cookies the historical data of the website usage are processed, problems and shortcomings in the site’s operation are diagnosed; statistics of user habits is collected, as well as the full and convenient use of the site functionality.

If you do not want to permit the use of cookies, you can terminate it by changing the settings of your internet browser, but in such a case the use of our website may be disturbed and encumbered. The deletion of saved cookies is possible in the section of settings of your internet browser of your device by deleting the history of saved cookies.

<b>Categories of personal data</b>	<b>Legitimate basis</b>
- Preferences of website users, statistics of habits	Your consent (configuration of the internet browser)

From what sources are we collecting personal data?

**- From you**

We summarise the data provided by you which you submit to us before the provision of our service, as well as when you visit the territory of our hotel (video surveillance) or our website (when applying for reception of advertising and informative materials)

**- Cooperation partners**

If you perform ordering of our service through our cooperation partners (for example, Booking.com, tourism agents, operators), we will obtain data from those cooperation partners to ensure provision of our service to you.

**To whom do we transfer your personal data?**

**- Providers of services and cooperation partners**

To fulfil our obligations towards you, we transfer your personal data to the companies which provide services to use, for example, to perform booking of the night accommodation. We carefully verify all providers of services which on our behalf and under our instruction process your personal data. We evaluate whether the cooperation partners (processor of personal data) apply the appropriate safety measures so that the processing of your personal data would be made in accordance with our assignments, instructions, orders and requirements of laws. These companies have no right to use your personal data for any other purposes.

**- Law enforcement bodies, governmental and municipal institutions**

To comply with the duties stipulated in laws, we may transfer your personal data to law enforcement bodies (for example, police) as well as governmental and municipal institutions at their request. We may transfer your personal data also to the law enforcement bodies (for example, courts) and governmental and municipal institutions in order to protect our legitimate interests by composing, submitting and maintaining legal claims,

## **Transfer of personal data outside European Union and European Economic Area (EEA)**

We always try to process your personal data in the territory of the European Union and the European Economic Area (EU/EEA). Your personal data are not processed in the country outside the EU/EEA

to provide to you the selected service. Transfer and processing of personal data outside the EU/EEA may take place if it has a legitimate basis, namely, to fulfil the duty stipulated in law, to conclude or execute an agreement, in accordance with your consent or in other narrowly defined special cases.

### **How long are your personal data stored?**

All personal data obtained from you are stored so long while you use our services or until you retract your consent if your personal data are processed on basis of such consent. A longer period of storage of personal data is permissible in order to fulfil the requirements of laws regarding the minimum term for storage of documents or information or to protect our legitimate interests. When this period expires, we will safely delete your personal data or make them inaccessible (by archiving) or unidentifiable so that they cannot be linked with you.

### **How do we protect your personal data?**

We ensure, constantly review and improve our protection measures to protect your personal data from unauthorised access, accidental loss, disclosure or destruction. In order to implement this, we apply modern technologies, technical and organisational requirements, including firewalls and antivirus software. Nonetheless, we recommend you to comply with the general safety rules of computer and internet usage, as well as requirements for protection and storage of your private data (in particular, personal identity documents), and we will assume no responsibility for unauthorised access to your personal data and/or loss of data if it has taken place due to your fault and negligence.

### **Your rights**

The laws and regulations in the sphere of data protection grants you several rights to influence the processing of your personal data.

#### **-Access to personal data**

You have the right to demand confirmations from us whether we process your personal data and in such case to request access to the personal data which we process, or deliver information regarding the personal data, if the ensuring of direct access is not envisaged.

#### **- Correction of personal data**

If you think that the information about you is incorrect or incomplete, you have the right to request that we change it.

### **Revocation of the consent**

Insofar we process your personal data based on your consent, you have the right at any time to revoke your consent to the processing of personal data.

#### **- Objection against the processing of data for the purposes of advertisement**

You have the right at any time to object to the processing of your personal data for the purposes of advertising delivery.

#### **- Objection against the processing based on legitimate interests**

You have the right to object to the processing of personal data which we perform based on our legitimate interests. Nonetheless, we will continue to process your data even when you have objected to it, if we have convincing motivated reasons to continue processing of the personal data. To exercise the above-said rights, please submit to us a written application.

#### **-Deletion**

Under certain circumstances you have the right to demand that we delete your personal data, but it does not apply to the cases when law requires that we store the data. To exercise the above-said right, please submit to us a written application.

#### **-Limitation of processing**

Under certain circumstances you have the right to demand limitation of processing of your personal data. Please, take into account that in the event when you demand that the processing of your data is limited, it may affect your possibilities to receive our services. To exercise the above-said right, please submit to us a written application.

#### **- Data transference**

Finally, you have the right to receive or transfer your personal data to another data controller. These rights include not only those data which you provided to us based on your consent or agreement, but also when the processing is made automatically. To exercise the above-said right, please submit to us a written application.

### **With whom can I get in contact if I have any questions?**

If you have any questions about the processing of your personal data, please get in contact with us.

If you are not satisfied with the received answer, you have the right to submit a complaint to the State Inspection of Data ([www.dvi.gov.lv](http://www.dvi.gov.lv)).

**Contact information of the Data Controller**

SIA "BONATE"

Adrese: **Piena iela 13, Rīga, Latvija**

E-pasts: [info@bellahotels.lv](mailto:info@bellahotels.lv)

Informatīvais tālrunis: [+37128005595](tel:+37128005595)