

## CONFIDENTIALITY STATEMENT

### General information

"BEST HOTELS MANAGEMENT" Ltd. is a company providing consulting and management services in the field of tourism and hospitality as at this moment our portfolio includes the hotels "Gloria" and "Rositsa" located in the resort "St. Constantine and Elena ". "BEST HOTELS MANAGEMENT" Ltd. operates in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation), Law on Protection of Personal Data, as well as other European and Bulgarian legislation on the protection of personal data. This statement for a confidential use of personal data of individuals contain the required information on the collection, processing and storage of personal data and the rights of subjects relating to the protection of their personal data.

### Personal Data Administrator Information

**Name:** "BEST HOTELS MANAGEMENT" Ltd.

**UIC:** 206354965

**Headquarters and an Address of the Management:** City of Varna, 26 A, "Bratya Shkorpil", 3rd floor, office 13

**Correspondence Address:** City of Varna, 26 A, "Bratya Shkorpil", 3rd floor, office 13

**E-mail:** [office@besthotelsmanagement.com](mailto:office@besthotelsmanagement.com)

**Phone:** +359882666525

"BEST HOTELS MANAGEMENT" Ltd. observes following principles relating to processing of your personal data:

- legality, integrity and transparency;
- collection of data for specified, explicit and legitimate purposes;
- minimizing data collection;
- accuracy and timeliness;
- limitation of data retention period in order to achieve the objectives;
- processing in a way that ensures an adequate level of integrity, confidentiality and security of personal data.

"BEST HOTELS MANAGEMENT" Ltd. collects and processes your personal data on the following grounds:

- pre-contractual relations and concluding a contract with you;
- our legal obligations under Bulgarian legislation - such as the Tourism Act, the Accounting Act and applicable regulations and the pursuant European legislation in the field of tourism and provision of services;
- consent (when querying; for a registration profile; in the treatment of special categories of data)
- protection of your vital interests (in case of emergency, when processing special categories of data where the data subject is physically or legally incapable of giving consent)
- protection of our legitimate interests (when collecting information about preferences in order to personalize our services)

### Scope of personal data processed

The scope of the personal data processed is always determined to be appropriately associated with and limited to what is necessary for the purposes for which the data are processed.

### Categories of personal data that we process

"BEST HOTELS MANAGEMENT" Ltd. is the administrator of personal data that you (The data subject) give us. We collect from you the following types of personal data:

- **Category - Personal Data of Employees:**

These are employees' personal data (name, PIN, gender and age, copies of identification documents, medical records, phone numbers, location, educational degree, professional background, marital status, nationality, data from bank cards, financial position, email addresses, mailing address, address of residence, health declarations, medical records, business contact information)

- **Category - Personal Data of Clients:**

These are employees' personal data (names, gender and age of the clients, identity documents, data from bank cards, email addresses, phone numbers, location, nationality, business contact information, PIN, mailing address and address of residence, marital status, medical records, documents of a legal nature.

- **Category - Personal Data of Job Applicants:**

These are Personal data of job applicants (names, PIN, gender and age, identity documents, medical documents, phone numbers, location, educational degree, professional biography, marital status, nationality, email addresses, correspondence address, address of residence, health declarations, medical documents, business contact information)

- **Category- Sensitive Personal Data:**

These are personal data of persons directly or indirectly related to gender, age, health status, visualizations, photos and/or other sensitive information concerning activities for the provision of tourist services, hotel accommodation and meals.

- **Category - Personal Data of Contractors and Partners:**

These are personal data of natural persons for execution of the contracts concluded under the Law on Obligations and Contracts, Commercial Law and others. Insofar as in connection with the performance of these contracts personal data of individual individuals are processed, information about them is processed in a minimum volume, sufficient only for the exact fulfillment of the obligations under the respective contract. Access to this information is provided to third parties only when indicated by a special law.

- **Special/sensitive data:**

These are personal data concerning health subjects and/or particular employees.

### **Purposes of information processing**

"BEST HOTELS MANAGEMENT" Ltd. processes personal data in compliance with a legal obligation, or in connection with the execution of a contract to which the data subject is a party or beneficiary, or to take steps at the request of the data subject prior to entering into a contract, or in connection with an explicit consent to the processing of personal data for one or more specific objectives. We need your personal data for the following purposes:

- Reason for the data collection of **Category - Personal Data of Employees:**

- ✓ in order to conclude an employment contract
- ✓ in order to undertake the information service activities for an officer in the National Insurance Institute, National Revenue Agency, NHIF, Occupational Health Service
- ✓ in order to undertake the information service activities for an officer in Labour Inspectorate, National Security, Court System
- ✓ other legally binding actions

- Reason for the data collection of **Category - Personal Data of Clients:**

- ✓ with the aim of professional advice in providing tourist services
- ✓ in order to make a reservation
- ✓ for a hotel accommodation
- ✓ for the purposes of using in the service organization
- ✓ in order to process documents in connection with the activity
- ✓ for the purposes of payments
- ✓ for the purposes of marketing and improving the quality of the tourist product
- ✓ other necessary legal action.
- Reason for the data collection of **Category - Personal data of job applicants:**
  - ✓ for the purposes of the selection of personnel
  - ✓ for the purposes of preliminary examination of eligibility for the position you are applying
  - ✓ in order to conclude an employment contract
  - ✓ other legally binding actions
- Reason for the data collection **Category- Sensitive Personal Data:**
  - ✓ to increase the security level , including in the case of video surveillance
  - ✓ in order to carry out the activities of providing tourist services
  - ✓ in order to comply with the legal provisions and the legal framework
- Reason for collecting of **Category - Personal Data of Contractors and Partners**
  - ✓ for the purpose of concluding and executing contracts
  - ✓ other legally binding actions
- Reason for collecting of **Category Special/sensitive data:**
  - ✓ processing is necessary to protect the life and health of the data subject;
  - ✓ processing is necessary to perform a task that is accomplished in public interest
  - ✓ the processing is necessary for the exercise of powers conferred by law on the controller or on a third party to whom the data are disclosed;
  - ✓ the processing is necessary for the realization of the legitimate interests of the controller of personal data or of a third party to whom the data are disclosed, except when the interests of the natural person to whom the data relate take precedence over these interests.

#### **Security measures**

“BEST HOTELS MANAGEMENT” Ltd. takes technical and organizational security measures to protect the administered data against unauthorized and illegal processing, accidental loss, destruction or damage of personal data, as may be required, given the state of technical development, usual practice and legal requirements.

- Using secure websites, encryption, masking;
- Carrying out reviews of practices for the collection, storage and processing of personal data, including physical security measures, in order to prevent unauthorized access to the systems used;
- Access to personal data within the organization have only persons whose employment functions require access to the data in order to carry out the activities for which the data have been collected and processed;
- Inclusion of contractual confidentiality clauses in all contracts with employees and third parties entrusted with the processing of personal data;
- Assigning the processing of personal data only to such organizations that adhere to the most high standards of information security and personal data security, demonstrated both by the

availability of relevant certifications and by the ability to carry out regular compliance audits.

Your personal data is processed by **"BEST HOTELS MANAGEMENT" Ltd.** at an office located in Bulgaria at: City of Varna, 26 A, "Bratya Shkorpil", 3rd floor, office 13 The hosting and the storage of your data is carried out in a Storage location located in our head office: City of Varna, 26 A, "Bratya Shkorpil", 3rd floor, office 13 Third parties have no access to your personal information, unless there is a specific legal requirement.

#### **Recipients of personal data**

**"BEST HOTELS MANAGEMENT" Ltd.** provide personal data to third parties only to the extent necessary for the execution of contracts and reservations of tourist services in relation to the employment law:

- Individuals to whom the data relate;
- individuals and legal entities, subcontractors on assignment from individuals, to whom the data relate; products/services operated by **"BEST HOTELS MANAGEMENT" Ltd.**
- third parties, physical, legal persons, public bodies, institutions and agencies in the performance of legal or contractual obligations of **"BEST HOTELS MANAGEMENT" Ltd.** or on other valid legal basis, such as detecting, preventing or performing other actions related to fraud, technical or security issues.
- banks, payment service providers and/or system operators as defined in the Law on Payment Services and Payment Systems, handling payments made by you.
- persons to whom BEST HOTELS MANAGEMENT Ltd. has assigned the task to maintain equipment and software used to process your personal data;
- security firms licensed to provide private security services, processing videos from offices of **"BEST HOTELS MANAGEMENT" Ltd.** in the process of providing the access regime in the same entities;
- persons providing services for organizing, storing, indexing and destroying archives on paper and/or electronic media;
- consular services;
- National Revenue Agency, National Insurance Institute, other state institutions under a legal obligation;
- Occupational Health Service, financial institution for a payment of salaries;
- Consumer Protection Commission, a law firm for a representation in inspections and disputes.

The subcontractors of **"BEST HOTELS MANAGEMENT" Ltd.** provide sufficient guarantees for the implementation of appropriate technical and organizational measures for compliance with Regulation 2016/679. Within the organization, access to the personal data of a subject have only employees whose immediate responsibilities are related to the provision of the service chosen by the entity, the sending of personal messages with proposals for the services offered or the management of human resources. The services offered by **"BEST HOTELS MANAGEMENT" Ltd.** are of a specific nature, so in the process and in the interest of the actual provision of the requested service, personal data are transferred to third parties, in strict compliance with Regulation 2016/679.

The transfer of personal data to other Member States of the European Union or agencies, offices and bodies of the European Union shall take place under the same conditions applicable to such transfers within the Republic of Bulgaria. Any transfer of personal data to a third country or to an international organization shall take place only if, subject to a decision of the European Commission, that third country or the international organization ensures an adequate level of data protection or if the data is transferred only there are appropriate safeguards in accordance with Art. 46 et seq. of the General Data Protection Regulation and on condition that enforceable data subject rights and effective legal remedies for data subjects are available.

#### **Data Retention and Storage limitation Policy**

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; For any purpose the time limits are set in accordance with the laws of the Republic of Bulgaria and in accordance with the Storage limitation Policy. In case there are no legal time limits for data retention, we store your personal data for a reasonable period determined based on additional criteria. The criteria for determining the period are consistent with our desire to provide you with high quality services. When the personal data we collect are no longer necessary in relation to the purposes mentioned, we erase or otherwise destroy the data. All personal data stored by us for marketing and service updates, we will keep until you notify us that you no longer wish to receive this information. In cases of emergency, pandemic situation and other circumstances that require extraordinary processing of personal data, there is an obligation the moment we have exhausted the purpose for which the information was collected - prevention, limitation and termination of the emergency situation - to further destroy the information collected.

Our Website User Policy of **"BEST HOTELS MANAGEMENT" Ltd.**, our Cookie Policy, as well as the use of services of **"BEST HOTELS MANAGEMENT" Ltd.** via <https://gloriahtl.com/>, subject to the provisions of Regulation (EU) 2016/679 you can see [here](#).

**Your rights as a subject of personal data are as follows:**

At any moment, while we are storing or processing your personal data, you have the following rights:

- You have the right to request from **"BEST HOTELS MANAGEMENT" Ltd.** a copy of your personal data and the right to access your personal data at any time;
- You have the right to request from **"BEST HOTELS MANAGEMENT" Ltd.** your personal data in a form convenient for the transfer to another personal data controller, or to request that we do so without being hindered by us;
- you have the right to request from **"BEST HOTELS MANAGEMENT" Ltd.** to correct without undue delay, your inaccurate personal data, as well as data that is no longer up to date;
- you have the right to obtain from **"BEST HOTELS MANAGEMENT" Ltd.** the erasure of your personal data without undue delay where one of the following grounds applies:
  - ✓ the personal data are no longer necessary in relation to the purposes for which they were collected;
  - ✓ you have withdrawn your consent on which the processing is based;
  - ✓ you have objected to the processing,
  - ✓ where the processing is unlawful;
  - ✓ the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
  - ✓ the personal data have been collected in relation to the offer of information society services.
  - ✓ We may refuse to erase your personal data for the following reasons:
    - ✓ for exercising the right of freedom of expression and information;
    - ✓ for compliance with a legal obligation which requires processing to which the controller is subject or for the performance of a task carried out in the public interest;
    - ✓ for exercising the right of official powers conferred on us (in case you are an authority);
    - ✓ for reasons of public interest in the area of public health;
    - ✓ in order to protect the life and health of the natural person to which the data relate;
    - ✓ for archiving purposes in the public interest, scientific or historical
    - ✓ research purposes or statistical purposes, as far as possible the erasure to render impossible or seriously impair the achievement of the objectives of that processing; Or
    - ✓ for the establishment, exercise or defence of legal claims.

- you have the right to request from **“BEST HOTELS MANAGEMENT” Ltd.** to restrict the processing of your personal data, in which case the data will only be stored but not processed. Our refusal to restrict the processing of your personal data will apply only in writing, and we are obliged to substantiate with the lawful reason;
- You have the right to withdraw your consent to the processing of your personal data at any time with a separate request addressed to the administrator;
- you have the right to object to certain types of processing, such as direct marketing (unsolicited advertising messages);
- you have the right to object to automated processing, including profiling;
- you have the right not to be subject to a decision based solely on automated processing involving profiling;
- if we need to use your personal data for a new purpose not covered by this Data Protection Statement, we will provide you with a new Data Protection Notice and when and where necessary, we will require your prior consent to the new processing.

### **Right to object**

If you believe that the personal data we hold about you is inaccurate or incomplete, you have the option to request that you view this information, correct it, or delete it. Please contact us at: City of Varna, 26 A, “Bratya Shkorpil”, 3rd floor, office 13

In case you want to lodge a complaint about the way we have processed your personal data, please contact us at: [office@besthotelsmanagement.com](mailto:office@besthotelsmanagement.com) or in writing to: the head office at: City of Varna, 26 A, “Bratya Shkorpil”, 3rd floor, office 13 Our Data protection officer will examine your complaint and make every effort to resolve the matter.

If you after that still believe that your personal data has not been processed in a lawful manner, you have the right to lodge a complaint directly to the supervisory authority, and the competent authority for Bulgaria is the Commission for Personal Data Protection with address: City of Sofia 1592, 43 2, “Prof. Tsvetan Lazarov” ([www.cpdp.bg](http://www.cpdp.bg)).