

As 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 company Ivka Ltd Ivka d.o.o., Beroje 15, Čilipi, Croatia at 24.05.2018. godine concludes

## PRIVACY POLICY

This privacy Policy ("Policy") applies to Ivka Ltd. (collectively, "Ivka Ltd.," "we," or "us"). At Ivka Ltd., we strive to deliver outstanding products, services, and experiences around the world. We value your business and, more importantly, your loyalty. We recognize that privacy is an important issue. We have developed this Policy to explain our practices regarding the personal information we collect from you or about you on this site or via our apps, through written or verbal communications with us, when you visit one of our properties, or from other sources.

By using any of our products or services and/or by agreeing to this Policy, e.g. in the context of registering for any of our products or services, you agree to the collection and use of Personal Information as described in this Policy.

Please note that this Policy does not apply to our processing of personal information on behalf of and subject to the instructions of third parties such as airlines, car rental companies and other service providers, companies that organize or offer packaged travel arrangements, marketing partners, or corporate customers.

### PERSONAL INFORMATION WE COLLECT

At every touch point or guest interaction, and in conducting every aspect of our business, we may collect personal information. This personal information may include: your contact information; information related to your reservation, stay or visit to a property; information related to the purchase and receipt of products or services; personal characteristics, nationality, passport number and date and place of issue; travel history; payment information, such as your payment card number and other card information, as well as authentication information and other billing and account details associated with mobile billing; guest preferences; marketing and communication preferences; information about vehicles you may bring onto our properties and other types of information that you choose to provide to us or that we may obtain about you.

We may ask for details on joint travellers, including their names and the age of the driver of the rental car.

In addition, we collect other personal information in certain cases, such as:

- *Surveys:* We may request demographic data or other personal information in customer surveys.
- *On-property Collection:* We collect additional personal information during registration/check-in at our properties, including such information as may be required by local laws. We may also use closed circuit television and other security measures at our properties that may capture or record images of guests and visitors in public areas, as well as information related to your location while on our properties (via keycards and other technologies). We may also use closed-circuit television and other technologies that record sound or video for the protection of our staff, guests and visitors to our properties where permitted by law. In addition, we may collect personal information in connection with on-property services, such as wellness and equipment rental.
- *Social Media:* If you choose to participate in Ivka Ltd. sponsored social media activities or offerings, we may collect certain information from your social media account consistent with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates and friend list. We may also allow you to enter into contests to provide photos, such as of your stay with us, which you may share with your connections on social media for votes, shared offers or other promotions.
- *Event Profiles:* If you plan an event with us, we collect meeting and event specifications, the date of the event, number of guests, details of the guest rooms, and, for corporate events, information on your organization (name and number of sponsored events per year). We also collect information about the guests that are a part of your group or event. If you visit us as part of a group, we may have personal information about you provided to us by the group and may market to you as a result of your stay with a group or attendance at an event in accordance with your preferences as permitted by law. If you visit us as part of an event, we may share personal information about you with the event planners, as permitted by law. If you are an event planner we may also share information about your event with third-party service providers who may market event services to you as permitted by law.
- *Employment Applications:* The information that you submit in your application on the Careers Site will be used to process your application, assess your capabilities and qualifications for a job and to communicate with you. If you become a Team Member, any personal information that you submit may become part of your Team Member file and may be used for other employment/work-related purposes.

In addition to the information we collect from you directly, we may also infer information about you based on the information you provide to us or from Other Information we collect.

## **PERSONAL INFORMATION WE COLLECT FROM THIRD PARTIES**

We may also collect information about you from third parties, including information from our airline, payment card, and other partners; from your social media services consistent with your settings on such services; and from other third-party sources that are lawfully entitled to share your data with us. We use and share this information (and may append this information to the other information we have on file for you) for the purposes described in this Policy.

## **USE OF PERSONAL INFORMATION COLLECTED ABOUT YOU**

We use your personal information in a number of ways, including to provide and personalize the services you request and expect from Ivka Ltd., to offer you the expected level of hospitality as set forth below in more detail:

- *Service Administration:* We use your personal information to administer programs in which you participate, including providing you with access to your account information, such as rewards status and offers for which you are eligible; to fulfil services that are part of such program; to enable direct communication between properties within the Ivka Ltd. and to facilitate collections.
- *Marketing and Communications:* Where permitted we may use your personal information to provide or offer you newsletters, promotions and featured specials, as well as other marketing messages in accordance with any communications preferences you have expressed. We use your information to provide in-stay messaging, account alerts, and reservation confirmations; to send you marketing messages; and to conduct surveys. We may provide these communications via email, postal mail, online advertising, social media, telephone, text message (including SMS and MMS), push notifications, in-app messaging, and other means (including on-property messaging, such as your in-room television). With your consent, we also use user-generated content (such as photos) from social media services to deliver display advertising or on our website and apps.
- *Meeting and Event Planning:* We may use your personal information to provide you with information about meeting and event planning.
- *Service Improvements:* We may use your personal information to improve Ivka Ltd.'s services and to ensure that our site, products, and services are of interest to you. We also use your personal information to provide you with the expected level of hospitality in-room and throughout our properties. This may include providing you with the ability to control your in-room technology through our website or apps on your personal devices. Also we may use your email address to send you your hotel bill via email. It is your responsibility to ensure that we have the correct (and preferred) email address for you. If you make a reservation for another person using your email address, that person's eFolio will be sent to your email address.
- *Data Correctness, Analytics and Personalization:* We may aggregate your personal information with data from third-party sources for purposes of keeping information up to date and analytics. We also rely on information from third parties in order to provide better, more personalized service. For example, if you connect your social media services or other accounts to our services, we may use this information to make your experiences with us more personal and social, or share and use it as described elsewhere in this Policy.

## **PERSONAL INFORMATION WE SHARE**

In order to offer you the expected level of hospitality and to provide you with the best level of service, we may share your personal information to our service providers and other third parties as set forth in detail below:

- *On-property Services:* We may share personal information with third-party providers of on-property services such as wellness and transfer services.
- *Other:* In addition, Ivka Ltd. may disclose personal information in order to: comply with applicable laws, respond to governmental inquiries or requests from public authorities, comply with valid legal process, protect the rights, privacy, safety or property of Ivka Ltd., site visitors, guests, employees or the public, permit us to pursue available remedies or respond to an emergency.

## **SENSITIVE INFORMATION**

The term "sensitive information" refers to information related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, or sexual orientation, genetic information, criminal background, and any biometric data used for the purpose of unique identification. We do not generally collect sensitive information unless it is volunteered by you. We may use health data provided by you to serve you better and meet your particular needs (for example, the provision of disability access).

## **PERSONAL INFORMATION FROM CHILDREN**

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not allow your children to submit personal information without your permission.

## **MOBILE AND LOCATION-BASED SERVICES**

If you request SMS (text) communications, you will be required to provide your phone number and carrier. We may also communicate with you by means of third-party digital messaging apps. If we do so, the privacy policies of those services apply.

## **LINKS TO THIRD-PARTY WEBSITES AND SERVICES**

Our site and our mobile applications may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If you provide information on and use third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

Ivka Ltd. may also partner with a limited number of Internet providers to offer Internet access to our guests. Your use of on-property Internet service is subject to the third-party Internet provider's terms of use and privacy policy. You can access those terms and policies using the links on the service sign-in page, or by visiting the Internet provider's website.

## **PROTECTING PERSONAL INFORMATION**

Ivka Ltd. will take reasonable measures to: protect personal information from unauthorized access, disclosure, alteration or destruction, and keep personal information accurate and up-to-date as appropriate. We also seek to require our affiliates and service providers with whom we share personal information to exercise reasonable efforts to maintain the confidentiality of personal information about you. For online transactions, we use reasonable technological measures to protect the personal information that you transmit to us via our site. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.

We use cookies and other technologies (such as Javascript, clear Gifs, links in emails and device IDs assigned by Google or Apple) to collect this information. If you want to remove or block Cookies from your device you can do it at any time.

For your own privacy protection, please do not send payment card numbers or any other confidential personal information to us via email. We will not contact you by mobile/text messaging or email to ask for your confidential personal information or payment card details. We will only ask for payment card details by telephone when you are booking a reservation. If you receive this type of request, you should not respond to it. We also ask that you please notify us at [data-protection-officer@hotel-adria.dubrovnik.com](mailto:data-protection-officer@hotel-adria.dubrovnik.com).

## **CHANGING AND ACCESSING YOUR PERSONAL INFORMATION**

As per 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 you are entitled to request that we inform you about the personal information we maintain about you and, where appropriate, request that we update, correct and/or delete personal information about you that we maintain in our active database. We will make all required updates and changes within the time specified by applicable law and, where permitted by law, may charge an appropriate fee to cover the costs of responding to the request. Such requests must be submitted in writing to:

Ivka d.o.o.,  
Služba za zaštitu podataka,  
Od Sv. Mihajla 21,  
20000 Dubrovnik, Croatia.

To protect your confidentiality, we can only respond to such requests to the email address that you have registered or otherwise provided to us.

## **RETAINING PERSONAL INFORMATION**

We retain personal information about you for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by applicable law.

We will destroy your personal information as early as practicable and in a way that the information may not be restored or reconstructed.

If printed on paper, the personal information will be destroyed in a secure manner, such as by cross-shredding the paper documents or otherwise and, if saved in electronic form, the personal information will be destroyed by technical means to ensure the information may not be restored or reconstructed at a later time.

## **CONTACT US**

If you have any questions about this Policy or how Ivka Ltd. processes your personal information, please contact us by email at [data-protection-officer@hotel-adria-dubrovnik.com](mailto:data-protection-officer@hotel-adria-dubrovnik.com) or by postal mail Ivka d.o.o., Služba za zaštitu podataka, Od Sv. Mihajla 21, 20000 Dubrovnik, Croatia.

The Hotel management