

## PRIVACY POLICY

Unique Hotels (hereafter „us“) values the privacy of each and every client. In this paper we will explain, which data we are collecting, why are we doing it and how are we using them.

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### **Who are we?**

Unique Hotels is a group of lifestyle hotels in Estonia. There are 5 hotels in our group: City Hotel Tallinn, von Stackelberg Hotel Tallinn, Kreutzwald Hotel Tallinn, Centennial Hotel Tallinn and Vihula Manor, which is located in Lääne-Virumaa County.

We use necessary technical, physical and organizational security measures to protect your data from disappearance, destruction and unauthorized access.

If you have any questions regarding the info in this Privacy Policy, please contact us: [dpo@uniquehotels.com](mailto:dpo@uniquehotels.com).

### **Which data are we collection and from whom are we receiving it?**

We collect the following data:

- ✓ Personal data: forename, surname, data of birth/social security number.
- ✓ Contact information: place of residence (full address), phone number, e-mail address.
- ✓ Visitor's card data: this is the data which is required by the Tourism Law of Estonia such as nationality, personal data of the people travelling with you (name, date of birth, nationality), the time of visiting the hotel and so on.
- ✓ Credit card info: card number, name of the card holder, expiry date.
- ✓ Security camera recordings – in case you visit our hotels or other rooms which have security cameras and other systems for security reasons.
- ✓ Data about personal preferences: such as preferred room type.

Usually we get all the data from you if you make your booking or enquiry through our website, via phone or e-mail. Also when you buy the services being present in the hotels.

Your data might be forwarded to us by travel agencies, booking companies and other parties which are dealing with travel intermediation from whom you have been ordering our services from. In case we have not received your data directly from you, we will forward our Privacy Policy as soon as possible after receiving your data.

### **Why do we need your data? What happens, if you do not present your data?**

We use your data to provide hospitality services ordered by you. In addition to accord the laws regulating our field of business and for other business objectives such as:

- ✓ personal data – we need this information to identify You to ensure that we provide the service only for the person ordered the service and paid for the service.
- ✓ contact information – we need this information to contact you. Above all we contact our guests via phone or e-mail, but in some cases the place of residence (full address) is needed. For example, when other contact methods do not work.
- ✓ Visitor’s card data – This requirement is enacted by law. The main objective is to prevent the possibility of illegal immigration.
- ✓ Credit card data– we need this information in case we have the right to deduct a certain amount of money from your credit card. This usually happens when you have ordered extra services or we need to ask for compensation for the damages etc done.
- ✓ data about personal preferences – If we ask this information or if you free willingly provide us with this info, we will use it to ensure the best hospitality service we can provide.

If you do not provide us with the data of the Visitor’s card, we cannot provide you any accommodation service.

If you have bought an accommodation service from us, we will send you some info about the special offers in our hotel. This will be done 3 days before arrival.

After leaving the hotel, we will send you an e-mail where we kindly ask you to give your feedback about the services provided by us. You are not obliged to give your feedback.

### **Under which legal basis are we processing the data?**

When processing your data, we are relying on the following legal basis:

- ✓ The need to create an agreement/contract with you or fulfill the contract.
- ✓ Your consent – You have always the right to withdraw your consent when we are processing your data based on your consent.
- ✓ The need to fulfill the liabilities decreed by the law (such as the filling of the Visitor’s card and maintaining it for 2 years).
- ✓ The need to fulfill our justified interests including the management of the company and general business activities; detection of fraud and legal violations.
- ✓ Need to protect your or others vital interests such as sharing your data with the emergency service when needed)
- ✓ In other cases decreed by the law.

### **With whom are we sharing the data?**

We are not sharing your data with others, except in cases below and when it is important to fulfill the objectives in the present Privacy Policy:

- ✓ Our daughter companies and affiliates: we can share your data between our group companies which are located in the EU.
- ✓ Service providers: as other companies we may use reliable third party companies for data processing such as IT and consultation companies.
- ✓ Government and Institutions: we can share your data with the governmental bodies which we are obligated to by the law or the data sharing is needed to protect our rights.
- ✓ Professional consultants and others: we can share your data with professional consultants such as lawyers, auditors, accountants and so on.

In case we share your data with the parties mentioned above, we will provide the protection of your and our data signing the data processing agreement with the third party.

We do not maintain or send your data outside of the European Economic Area or to countries which are not a part of the resolution of the 95/46/EC directive-(article 25(6) or the followed document of the regulation 2016/679 EU article 45(1).

### **Kui kaua me teie andmeid säilitame?**

We maintain your information as long as it is necessary for reaching different data processing objectives.

For maintaining personal data our business follows the criteria below:

- we maintain personal data until it is necessary for offering our services
- if a person has a client account or card, we maintain personal data for as long as account/card is active or as long they are needed for offering our services
- In case business has an obligation by law, contract or other responsibility for maintaining personal data, we will keep personal data until this obligation is fulfilled.
- After contractual relationship has ended, we maintain certain data until the person (data subject) or business itself has a right to make a claim against the other party. According to the current law, the right to make a claim is valid for 10 years.

For example, we maintain the data from the Visitor's card for 2 years from the moment the card has been filled. Credit card data is maintained until the accommodation service agreement (between you and us) is fulfilled.

If you have given us your consent for sharing direct marketing materials with you, we maintain your contact until you have withdrawn your consent.

### **Which rights do you have regarding your data?**

As a data subject you have the following rights:

1. *The right to acquaint yourself with the data*– you have the right to know which information about you is maintained and how is it processed.
2. *The right to correct the data*– you have the right to demand the correction of the data if it is false.

3. *The right to delete the data ("right to be forgotten)* – in certain cases you have the right to demand, that we erase your data (for example if we do not need the data, you withdraw your consent and so on).

4. *The right to limit the data processing* – you have the right to limit or forbid the data processing for a certain period of time (for example, if you have filed a dispute)

5. *The right to submit an objection* – depending on the circumstances you have the right to submit an objection if the data processing is done based on our justified interest or based on the public interest. In case of direct marketing you will always have the right to submit an objection.

6. *The right for data transfer*– You have the right to demand the transfer of the data we have about you in machine readable form. You may also demand the transfer to another accountable data processor, but only in case if it is technically feasible. The right for data transfer is only valid considering the data we use based on your agreement or based on the need of fulfilling the agreement signed by you and us.

7. *The right for automatic decisions (profile analysis)* – in case we have informed you that we are carrying out profile analysis, which will bring along legal consequences which will affect you, you can demand, that the decisions would not be made only based on the automatic processing.

If you have any questions regarding the info in this Privacy Policy or you would like to submit an application for implementation of right of the data subject, please contact us:  
[dpo@uniquehotels.com](mailto:dpo@uniquehotels.com).

We do our best to address your applications and wishes on time and free of charge except for the cases which might cause an unproportioned cost. If you are not satisfied by our response, you have the right to file your dispute to Estonian Data Protection Inspectorate.