

HEDON SPA&HOTEL

TERMS AND CONDITIONS FOR PROCESSING PERSONAL DATA

The controller of personal data is Supeluse Hotell OÜ (hereinafter *Hedon Spa&Hotel* or *we*, registry code 12457242), located at Ranna puiestee 1, 80010 Pärnu, Estonia, phone +372 44 99 000, e-mail info@hedonspa.com.

We process personal data for the purpose of providing accommodation, spa, beauty and restaurant services, as well as related services (see <https://www.hedonspa.com/>, hereinafter the *services*).

We process data from security cameras and electronic access points to ensure security on the premises of Hedon Spa&Hotel.

Personal data are processed both electronically (e.g. online booking, accommodation service registration data, e-gift cards, Hedon Fan Club loyalty programme) and on paper (e.g. guest cards).

What kind of personal data do we process?

When you use the services of Hedon Spa&Hotel, we process the following personal data:

- first name;
- surname;
- date of birth or personal identification code;
- address and country of residence or location;
- phone number;
- email address;
- citizenship;
- name, age and citizenship of the companion and children accommodated with you;
- document data;
- date of provision of accommodation services;
- data related to payments, incl. bank card data;
- digital signature in relation to payments;
- your comments (if you use additional services) and feedback.

When you subscribe to the Hedon Spa&Hotel newsletter, we process the following personal data:

- first name;
- surname;
- email address.

When you join the Hedon Fan Club, we process the following personal data:

- first name;
- surname;

- email address;
- date of birth;
- gender;
- phone number;
- history of using the services.

When you buy a Hedon Spa&Hotel e-gift card, we process the following personal data:

- name of the buyer;
- email address of the buyer;
- phone number of the buyer.

In connection with the use of security cameras on the premises of Hedon Spa&Hotel, including in the pool area and the public rooms of the spa, we process the following personal data:

- images of persons;
- movement of persons on the premises of Hedon Spa&Hotel;
- security camera recordings and their data.

In connection with the use of electronic access cards on the premises of Hedon Spa&Hotel, we process the following personal data:

- movement of persons on the premises of Hedon Spa&Hotel.

In connection with beauty and spa procedures, we process the following personal data:

- procedure details (name of the service).

Why do we process personal data?

- Personal data are used for the provision and management of bookings and services.
- The aim of processing accommodation service registration data (first name, surname, date of birth, address, citizenship, name, date of birth and citizenship of companions and children accommodated with you, date of provision of accommodation services) is to comply with the Tourism Act and the legislation of the Republic of Estonia.
- The aim of processing data from security cameras and access systems is to ensure the security of customers and guests and to protect their safety, life, health and property, as well as to protect the property of Hedon Spa&Hotel and ensure the flawless operation of the equipment necessary for the provision of services.
- We use personal data to prepare invoices and manage payments.
- Name and email address are used to notify customers of any offers from Hedon Spa&Hotel and its cooperation partners.

- When you join the Hedon Fan Club loyalty programme, we use personal data to generate personal offers and send invitations to you and to inform you of new services.
- When you buy a Hedon Spa&Hotel e-gift card, we process personal data to deliver the e-gift card.
- We process procedure details and data concerning the use of the spa for customers to be able to choose the appropriate services. We do not process health data for this purpose.
- We also process personal data to gather statistical data for business purposes and to make the services better for our customers. If necessary, we also process personal data to protect our rights.

Legal basis

- Upon providing Hedon Spa&Hotel accommodation services, we process your name, date of birth, citizenship and address, the name, date of birth and citizenship of the companion and children accommodated with you, and the date of provision of accommodation services for the purpose of fulfilling the contract and the obligations deriving from law.
- We use the phone number and email address provided to notify you of booking confirmations and changes in services. The comments you have added inform us of when you would like to use certain services.
- If you wish to receive newsletters and direct marketing offers from Hedon Spa&Hotel, data are processed with your consent.
- In the Hedon Fan Club loyalty programme, we process your name, email address, date of birth, address and service usage history on the basis of your consent.
- When you purchase a Hedon Spa&Hotel e-gift card, we process your name, email address and phone number for the fulfilment of the contract.
- Personal data may also be processed on the basis of legitimate interest and obligations arising from law (e.g. accounting, administration of payments, settlement of consumer complaints and protection of certain rights).
- We process data from security cameras and access systems on the basis of legitimate interest for ensuring security.
- We only process health data in connection with an unforeseen need to forward these data to an ambulance crew or hospital in the event of an accident, and we process such data on the basis of legitimate interest. We do not process health data for any other purposes.

With whom do we share personal data?

- Data from security cameras are only processed by the employees of Hedon Spa&Hotel who have been specifically appointed for this purpose by the management, and they do so only for security purposes.
- We transmit data to information system service providers (if this is necessary for providing services to customers) to ensure the functionality of the webpage, booking system or data hosting of Hedon Spa&Hotel, as well as to advertising and direct marketing service providers.
- Pursuant to the requirements of the Tourism Act and other legal acts, the booking data of the users of accommodation services may be extraordinarily transmitted to the Police and Border Guard Board and the courts upon their justified request.

Security and access to data

- We use various software solutions to process personal data (customer management, registration data, service usage history, bookings, statistics, analysis and direct marketing), and we make sure any such solutions meet data processing requirements. Hedon Spa&Hotel has concluded data processing agreements with processors that ensure an equivalent level of data protection as specified in these terms and conditions.
- Personal data are stored in servers located in the territory of European Union Member States or countries that have joined the European Economic Area. Personal data are generally not transmitted to countries outside of the European Union. Data may be transmitted to countries the data protection level of which has been assessed as adequate by the European Commission.
- If personal data are transmitted in hard copy (e.g. guest cards, joining the Hedon Fan Club loyalty programme), we store the hard copies in a closed archive.
- Access to personal data is granted to Hedon Spa&Hotel employees who can access personal data in order to resolve technical issues related to the use of Hedon Spa&Hotel services and provide customer support services.
- Only persons appointed for this purpose have access to security camera recordings and access system data. Camera recordings are erased after 30 days, if the Police and Border Guard Board or a court has not requested their transmission or has asked us to store them and we do not need the recordings in order to protect our interests. Access system data are erased upon the end of a customer relationship or when they are no longer needed.
- Hedon Spa&Hotel applies appropriate physical, organisational and information technology based security measures in order to protect personal data from accidental or unlawful destruction, loss, alteration or unauthorised access and disclosure.

Access to and rectification of personal data

- You can access and rectify your personal data by contacting a Hedon Spa&Hotel data protection specialist by email at hedon@hedonspa.com.

Withdrawal of consent

- If personal data are processed on the basis of consent (the Hedon Fan Club loyalty programme, newsletter or, if necessary, any other circumstance), you have the right to withdraw your consent at any time by notifying Hedon Spa&Hotel of this by email at hedon@hedonspa.com.

Storage

- Personal data, which are used for the provision and management of bookings and services, are stored for three years after the end of the customer relationship.
- Accommodation service registration data (first name, surname, date of birth, address, citizenship, name, date of birth and citizenship of companions and children accommodated with you, document numbers, date of provision of accommodation services and other data) are stored until the end of the customer relationship and the expiration of any resulting claims.
- In the case of payment and consumer disputes, personal data are stored until the fulfilment or expiration of the claim.
- If personal data are processed based on consent in connection with the loyalty programme, personal data are stored until the person exits the loyalty programme, withdraws his/her consent or until the end of the time limit of the claims arising from the loyalty programme.
- Personal data necessary for accounting are stored for seven years.
- If personal data are transmitted in hard copy (e.g. guest cards, joining the Hedon Fan Club loyalty programme), we destroy the hard copies after the end of the storage term.

Reviewing personal data

A person has the right to:

- review the personal data gathered with regard to him/her;
- request the rectification or supplementation of incorrect personal data, if the data are incorrect or insufficient;
- request the erasure of personal data for the use of which there is no legal basis;
- request the restriction of the processing of personal data;
- submit objections with regard to the processing of personal data;
- file an appeal with regard to our activities with the supervisory body, the Data Protection Inspectorate (www.aki.ee).

In order to exercise these rights, the person has to submit a written signed request. Hedon Spa&Hotel will respond to the request within 1 month. Data from security cameras are released on the terms and conditions and within the term specified in Hedon Spa&Hotel's notice of use of cameras.

Portability

- In order to have your personal data transmitted from one system to another, you need to contact Hedon Spa&Hotel customer support by email at hedon@hedonspa.com. Customer support will verify your identity and inform you of the transmission of personal data. We shall respond to data portability requests no later than within one month.

Direct marketing

- Email address and phone number are used for sending direct marketing messages, if you have given the relevant consent. If you do not wish to receive newsletters or direct marketing messages, you should select the relevant link at the bottom of the email or contact us by email at hedon@hedonspa.com.
- With regard to the processing of Hedon Fan Club personal data (incl. profiling), you have the right to file objections at any time by notifying us of this by e-mail at hedon@hedonspa.com.

Complaints

If you have any complaints to us in connection with the processing of personal data, please contact us by email at hedon@hedonspa.com.