



1. General

This data protection info sheet informs you which personal data Kalamper Hotel & Spa processes, in what way and for what purpose, in an automated manner, and what your rights as affected person (data subject) are.

2. Controller (Responsible)

Controller hereinafter referred to as “the Controller” is representative of Kalamper Hotel & Spa, Veliki Pijesak b.b., Bar, Crna Gora, tel: +382 68 333 833, E-mail: sales@hotelkalamper.me

3. Collection and processing of personal data

The protection of your personal data is a matter of special importance to us. Your personal data will therefore only be processed to the extent that is permitted by law and required for the fulfillment of the respective purpose (registration, provision of services, medical treatments, fulfillment of legal obligations and legitimate interests, sending information material and advertising, sending a newsletter, customer analysis).

Following personal data is collected and processed for the purpose of providing our services:

- First and last name
- Date of birth
- Place of birth
- Gender (male or female)
- Residence: city, state and zip code
- Nationality
- Telephone number



- E -mail adress
- ID type (ID card or passport) and ID number
- Expiry date
- Company
- Tax number
- Photo
- Remarks
- Allergies
- Special requirements
- Credit card/payment details
- Copy of ID card for exchange office transactions
- Other ways of transportation:(flight number, arrival time,)
- Guest preferences (sea view or park view, room type)

We need your explicit consent in order to process the above-listed health data (allergies and special requirements). You can revoke your consent at any time. Please note that in the event that you do not give your consent or revoke it during our business relationship, we cannot fully provide our services, hence, you take advantage of our services at your own risk.

4. Profiling

Profiling is the process in which a responsible person (data controller) collects and process personal data for the purpose of providing and improving the services and personalizing the offers and services to suit guest's needs. However, no decisions which could have legal effect or could harm you in any way will be made by automated means.

We can process the following data in our system PMS : name, gender, title, personal address, nationality, region, telephone number, email-address, birthday, travel document, date of issue, expiry date, occupation, tax number, member card, photo, remarks.



We can allocate the following reservation-related data to your profile: past reservations, future reservations, invoices, offers, confirmations, notes and questionnaires.

Personal data you provide will be processed until you revoke your consent.

You can revoke your consent at any time, free of charge and without stating reasons at the hotel reception, by email to sales@hotelkalamper.me or by phone to number +382 68 333 833.

5. Taking photos at events and courses

We have a legitimate interest to take photos at events and courses and to publish them on our website for marketing purposes.

If you do not agree with this, you can object to this processing and the publication any time at the hotel reception, by email to sales@hotelkalamper.me or by phone under **+382 68 333 833**.

6. Video surveillance

For the purpose of public security there may be video surveillance at the hotel entrance, hotel reception, ATMs, kitchen areas, parking, beach and pool-bars, area around wellness buildings and staff offices. Videos are stored on stand-alone hard disks at each location, and access is provided to external security companies.

7. Your personal data are not transmitted to third parties except in the following cases:

- when we are legally obliged to transmit the data based on e.g. Criminal Law, Criminal Procedure Law and similar,
- for services in your interest outside the hotel area, upon your request (e.g. taxi, restaurant reservation, yacht, etc.)
- for payment processing purposes, your bank details are forwarded to electronic payment services.



8. Data processing on behalf of the Controller

Where processing is to be carried out on behalf of the Controller by the Processor, the Controller remains liable for the protection of your personal data.

9. Google Analytics

Our websites use Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies" (text files stored on users' computers) which allow an analysis of the website usage. The information generated by the cookies about the use of the websites by the users are usually transmitted to a Google server in the USA and are stored there.

In the case of the IP anonymization activation on our websites, the Google users IP address will be shortened beforehand within European Union member states or in other states members of the European Economic Area. Only in exceptional cases the full IP address will be transmitted to a Google server in the US and shortened there. IP anonymization is active on our websites. On behalf of the operator of our websites, Google will use this information to evaluate the use of the websites by the users, to compile reports on the website activities and to provide further services relating to website usage and internet usage to the website operator.

The shortened IP address provided by Google Analytics within the User Browser will not be merged with any other data provided by Google. Users can prevent the storage of cookies by the opt-out function on the Falkensteiner website or alternatively by an appropriate setting of their browser software; FMTG Services GmbH, however, points out to users that in this case, not all functions of our websites may be fully utilized. Furthermore, users can prevent the collection of data (including their IP address) generated by the cookies as well as the processing of this data by Google

10. Duration of the processing

We process your personal data, health data, data concerning allergies and other special requirements - if necessary - for the duration of the entire business relationship (from the initiation, performance to the termination of a business relationship and until all open claims in connection with the business relationship have been satisfied in full).



The above listed data will be stored and processed until you withdraw your consent to this processing. The withdrawal of your consent has no effect on the lawfulness of the data processing up to this time.

After the business relationship ends, your data will be stored until expiry of the warranty, limitation and compensation periods as well as until expiry of legally binding retention periods and upon termination of any legal dispute in which the data is required as proof.

The data that you have provided us for marketing and information purposes, such as for sending a newsletter, is stored until you revoke your consent.

11. Data security

We are implementing technical and organisational measures to secure your personal data from accidental or intentional manipulation, loss, destruction, alteration and unauthorised disclosure as pursuant to the Article 28 of the General Data Protection Regulation. The security measures are being continuously improved in line with technical progress.

12. Your rights

With regard to the processing of your data, you may claim the following rights under the General Data Protection Regulation and the national data protection law:

- Right of access

You have the right to obtain confirmation as to whether or not personal data concerning you is being processed. The confirmation contains the purposes of the processing, the categories of personal data concerned and recipients or categories of recipients to whom personal data have been or will be disclosed and the duration of the processing.

- Right to rectification

You have the right to obtain the rectification of inaccurate personal data concerning you and the right to have incomplete personal data completed, without undue delay.



- Right to erasure

You have the right to obtain the erasure of personal data concerning you without due delay when the personal data have been unlawfully processed, when the processing disproportionately interferes with your legitimate interests, when the personal data are no longer necessary in relation to the purposes for which they were collected and when you withdraw your consent on which the processing is based. Please note that there may be reasons that preclude immediate erasure, such as in the case of legal retention obligation.

- Right to restriction of processing

You have the right to obtain the restriction of processing of your data when:

- you contested the accuracy of the data, for a period enabling us to verify the accuracy of the data;
- the processing is unlawful, you oppose the erasure and request the restriction of data usage instead;
- we do no longer need the data for the purposes of the processing, but you require the data for the establishment, exercise or defense of legal claims, or
- you objected to processing of the data.

Where there is a request for the restriction of processing, this data will be processed only with your consent, or for the establishment, exercise or defense of legal claims.

- Right to data portability

You have the right to receive the personal data concerning you, which you provided to us, in a structured, commonly used and machine-readable format where:

- we are processing the data based on your given and revocable consent or for a fulfillment of contract between us, and
- the processing is carried out by automated means.



- *Right to object*

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data, necessary to safeguard your legitimate interests or legitimate interests of a third party. Your data shall no longer be processed unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or the processing is necessary for the establishment, exercise or defense of legal claims.

You have the right to object to be targeted by the direct marketing at any time without stating grounds for the objection.

- *The right to lodge a complaint*

If you are of the opinion that we are processing your data contrary to national or European data protection legislation, you can contact us at any time. You also have the right to contact the relevant data protection authorities.

- *Asserting your rights*

In order to assert one of the aforementioned rights, please use the following contact options:

○ Email to: sales@hotelkalamper.me

○ Letter to:

Kalamper Hotel & Spa,
Veliki Pijesak b.b.,
85000 Bar, Montenegro

○ Call on phone No.: +382 68 333 833

Hotel manager

Snežana Pekić

manager@hotelkalamper.me