

Information on personal data processing

1. Data Controller

The Administrator of your personal data is LENKO S.A. with its registered office in Bielsku-Białej, at the address: ul. Okrzei 2, 43-300 Bielsko-Biała, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the Bielsko-Biała, VIII Commercial Division of the National Court Register, under the number KRS 0000138638, tax identification number (NIP): 5470170653, statistical identification number (REGON) 070478394, (hereinafter referred to as the “Entity”).

Contact details

In any matters related to the processing of your personal data by the Entity and enforcing the rights related to the data processing, the Personal Data Officer Agnieszka Kloc appointed by the Entity shall be contacted at the e-mail address: iodo@marma.com.pl or in writing at the address: 35-030 Rzeszów, Al. Pod Kasztanami 10 with the note: “Personal data”.

3. Purposes and legal basis of processing

Your personal data may be processed for the purpose of:	Basis for processing:
➤ conclusion and performance of the contract	➤ agreement
➤ direct marketing, including profiling for marketing and analytical purposes	➤ the necessity to process for the implementation of a legally justified interest of the Entity; a justified interest of the Entity is carrying out of direct marketing of the services provided
➤ for the marketing purposes of the Entity, including profiling for marketing and analytical purposes	➤ consent granted, and in some cases (e.g. contact for obtaining the consent) also the justified interest of the Entity
➤ for marketing purposes, including analytical purposes and profiling of third parties, including the partners of the Entity	➤ consent; in case consent is not granted personal data is not processed for that purpose
➤ monitoring	➤ protection of your vital interest and protection of the vital interest of other natural persons, as well as the justified interest of the administrator – security of persons and assets
➤ for the purpose of verifying satisfaction of the customers availing of the services provided by the Entity	➤ the necessity to process for the implementation of the legally justified interest of the Entity; the justified interest of the Entity is the determination of the quality of service and the level of Entity customers satisfaction from the products and the services provided
➤ for archiving purposes	➤ the necessity to process for the implementation of a legally justified interest of the Entity; the justified interest of the Entity is securing of information in case of a legal need to prove facts
➤ for the purpose of pursuing the possible	➤ the necessity to process for the

claims related to the agreement concluded with you and the hotel service provided based thereon	implementation of a legally justified interest of the Entity; a justified interest of the Entity is the possibility of pursuing claims by the Entity
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4. Categories of personal data processed by the Entity

- Basic identification data, address and contact data, personal details

5. Data recipients

- Your personal data may be disclosed to the companies of the capital group to which the Entity belongs (companies related to the Entity) or third parties for the purposes referred to above (including marketing purposes, providing that you accept the marketing purposes for which the disclosure of personal data is needed). Your personal data may be disclosed to the entities processing personal data to the order of the Entity, including but not limited to IT services operators, entities processing the data for receivables collection purposes, marketing agencies, accounting companies, law firms – whereas the entities process the personal data based on agreements with the Entity and solely in accordance with the Entity's instructions. Your personal data may be disclosed to the entities authorised to obtain the data based on the binding law, e.g. courts or law-enforcement authorities – in accordance with the respective legal basis.

6. Disclosure of data outside of the European Economic Community

- The personal data collected will not be disclosed to the recipients seated outside of the European Economic Community (i.e. EU countries, Island, Lichtenstein and Norway). If the personal data collected is transferred to a third country, this will be done exceptionally in special situations where realization of such transfer will be based on your explicit consent, or the transfer is indispensable for the performance of the contract between you and the Entity or for the implementation of pre-contractual measures taken at your request; or the transfer is indispensable for the conclusion or performance of an agreement concluded in your interest between the Entity and another natural or legal person, or the transfer is indispensable for the determination, investigation or protection of claims

7. Data storage period

- Your personal data will be stored by the moment of prescription of the claims under the agreement/service provision or by the moment of expiry of the duty to store personal data resulting from the legal regulations, and specifically the duty to store the accounting documents applicable to agreement. Whenever the Entity processes your personal data based on the justified interest, personal data will not be processed for the specific purpose if you object to such processing. If the Entity processes personal data based on your consent, the data will be processed by the moment of the consent withdrawal.
- The personal data collected in relation to the application of monitoring by the Entity will be processed for 30 days since the date of recording and further permanently removed.

8. Rights of the data subjects

- You are entitled to: access your personal data, claim their correction, erasure or limitation of processing of the same, as well as to object the processing of your personal data. You are entitled to withdraw the consent for the processing of your personal data in the scope in which consent is the basis for such processing. Withdrawal of the consent does not affect the compliance with law of the processing made based on the consent before the latter has been withdrawn. You are entitled to the transfer of your personal data in the scope in which the data are processed for the purpose of the agreement performance/service provision, or are processed based on a consent. Your personal data will be disclosed in a structured, generally applied format, fit for machine reading. You are entitled to file a complaint with the Supervisory Authority dealing with the personal data protection.

9. Information on the source of personal data

- If your personal details have not been transferred to us directly by you, it means that the Entity obtained them from publicly available sources.

10. Information on the requirement/freedom to provide data

- Providing personal data in relation to the concluded agreement and the services provided based thereon is voluntary, however, necessary for the conclusion and performance of the agreement – without providing the personal data the agreement and provision of services by the Entity is not possible. Personal data are provided for marketing purposes on voluntary basis.

11. Automated decision making

- In the process of the agreement performance and provision of services, the Entity makes no decision in an automated manner.

Bielsko-Biała, 20.05.2018

Wersja 1.0