

## **GDPR - Privacy Policy**

Pursuant to Regulation (EU) No 182/2011 of the European Parliament and of the Council 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and in accordance with Act no. 18/2018 Coll. on the protection of personal data in the valid and effective wording entitled Internal Directive no. 1/2018 on the policy and principles of protection of natural persons in connection with the processing of personal data accepted and approved by the business company Residence BS, s.r.o., IČO: 53 599 951, MUDr. Straku 2894/6, Žiar nad Hronom 965 01 on 27.02.2021 at the company's registered office (hereinafter referred to as the "internal directive")

### **Article 1 Introductory provision**

The purpose of the development of personal data protection policy and principles in connection with the processing of personal data in our company is to create a legal internal company framework in one document for the use of procedures in accordance with the above legally binding regulations on personal data protection. This document will also be used in case of control from the Office for Personal Data Protection. Our company is primarily engaged in the provision of accommodation services and these activities process the personal data of our clients and therefore it is in our best interest that all our procedures and processes within the company comply with applicable and effective data protection regulations.

### **Article 2 Security and responsibility policy in our company**

- 1) Achieving the highest possible protection of our clients' personal data is a high priority for our company and, in addition to existing business goals, the management of the company and also the employees will pay increased attention to this area. The measures of a technical and organizational nature that will be used in our company will be carefully selected with regard to the scope of personal data processing and the technical and personnel capabilities of our company, but always in such a way that these means are as efficient and effective as possible. regulation in the SR and the EU.
- 2) The designated authorized person for the area of personal data protection of natural persons in our company is the statute of Mgr. David Ivan. He is entitled and obliged to control the level of protection in this area within the company within its internal processes and also externally to third parties, especially clients, ie natural persons whose data are processed in the company's business activities. The manager is entitled to appoint for himself a person from among the employees for this purpose.
- 3) As a company, we hereby expressly undertake to continuously monitor developments in the field of legislation, case law and technical and other developments in personal data

protection and to implement the knowledge gained in our own processes in order to improve personal data protection in our company.

4) As a company, we are committed to conducting regular trainings 2 times a calendar year for employees and company management aimed at repeating the knowledge and understanding of personal data protection, their deepening as well as gaining new knowledge. These activities will also be designed to sensitize the company's employees and management and to increase the sense of responsibility of all parties involved, given the importance and sensitivity of the area of personal data protection.

### **Article 3**

#### **Legal framework for personal data protection**

1) The valid and effective wording of the EP and Council Regulation no. 2016/679 as well as the wording of Act no. 18/2018 Coll. on the protection of personal data. In addition to these regulations, amendments to ISO 27001, ISO 27000, ISO 31000 and possibly other standards will be noted for this purpose.

2) If necessary, our company will also use the services of external companies to provide training and documentation to ensure compliance with personal data protection legislation, especially law firms or persons who have demonstrable experience and in-depth knowledge of personal data protection.

### **Article 4**

#### **Documentation and personal data protection**

1) In the event that our company as an operator transfers the obtained personal data about natural persons to another person as an intermediary, we are obliged to draw up a special agreement between our company and each such other person as an intermediary, or to incorporate the relevant provisions under the law. no. 18/2018 to the framework contract, or to prepare an addendum to this contract.

2) Other documents that our company undertakes to prepare for the needs of personal data protection and for the purposes of proving compliance are Internal Guidelines, Training records, Records of personal data processing, Security event report form of the Office for Personal Data Protection, Security event report form the natural person concerned, or other documents as appropriate.

### **Article 5**

#### **Existing and planned technical and organizational measures**

Our company is committed to implementing appropriate technical and organizational measures that will be implemented in order to improve the personal data protection processes of individuals. The description of the measures related to the use of the structure as given in ISO Standard 27002 and ISO Standard 29151 includes the following:

- Uniform procedure for handling complaints, objections, complaints of affected natural persons
- Control of access to the facility where the personal data of clients are located, whether in electronic form or in paper form
- Information classification and subsequent consistent sorting and secure storage and backup
- Increasing the security of physical spaces as well as the environment of the organization, especially by replacing locks with more durable, increasing the frequency of use of locks and security cabinets

- Increasing the use of encryption of the data itself as well as communication in the transmission of this data in electronic form
- Increase the use of password-based access to mobile devices, laptops, desktops and other devices on which data is processed by at least a 14-digit password consisting of letters
- Backing up personal data using a two-way method using a medium other than the one on which the original data is stored
- Use of anti-virus and anti-malware applications within the organization
- Regular examination and search for weaknesses in internal company processes and their subsequent elimination
- Purchase of USB media with the possibility of using encryption, or with the possibility of using biometric data for authentication
- Use HDD and SSD encryption applications
- Ensuring a friendly approach and full professional and organizational cooperation of employees and company management during control from the Office for Personal Data Protection

On *B. Štavnica* on *08.01.2022*

**Residence BS, s.r.o.**

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