

TERMS AND CONDITIONS OF PROCESSING PERSONAL DATA

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

Hedon Spa&Hotel processes personal data for the purpose of providing accommodation and spa services. Personal data are processed both electronically (e.g. online booking, accommodation service registration data, e-gift card, Hedon Fan Club loyalty programme, and on paper (e.g. guest cards). Below, we explain how Hedon Spa&Hotel processes the personal data of customers.

What kind of personal data we process

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

- first name;
- surname;
- date of birth;
- address;
- phone number;
- email address;
- citizenship;
- name, date of birth and citizenship of the companion and children accommodated with you;
- document number (in the case of citizens of countries outside the European Union);
- date of provision of accommodation services;
- data related to payments;
- your comments (if you use additional services).

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;
- address;

- history of using the services of Hedon Spa&Hotel.

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.

Why we process personal data

- Personal data is used for the provision and management of bookings and services. We process personal data for the purpose of providing accommodation services, spa services and other services (see <https://www.hedonspa.com/>).
- 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.
- We use personal data for preparing invoices and managing payments.
- Name and e-mail address are used to notify customers of new and interesting 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 for delivering the e-gift card.

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 e-mail address 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.
- When you wish to receive Hedon Spa&Hotel newsletters, data is processed with your consent.

- In the Hedon Fan Club loyalty programme, we process your name, e-mail 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, e-mail 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 and settlement of consumer complaints).

Receiver to whom we forward personal data

- Personal data is forwarded to Hedon Spa&Hotel Customer Support for managing services and resolving customer problems.
- Data related to payments is processed by the accountants of Hedon Spa&Hotel.
- The data of Hedon Spa&Hotel e-gift cards are processed by the employees of the Accounting Department of Hedon Spa&Hotel.
- The data of the Hedon Fan Club loyalty programme is processed by the employees of the Marketing Department of Hedon Spa&Hotel.
- Personal data may be forwarded to providers of IT services to ensure the functionality of the Hedon Spa&Hotel website, booking system, direct marketing, advertising services and data hosting.
- Due to the requirements of the Tourism Act, the registration data of users of accommodation services may be forwarded to the Police and Border Guard Board.

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), in the case of which we make sure such solutions meet data processing requirements. Hedon Spa&Hotel has concluded data processing agreements with processors, which ensure an equivalent level of data protection as specified in these terms and conditions.
- Personal data is stored in servers located in the territory of European Union Member States or countries that have joined the European Economic Area. Data may be transmitted to countries the data protection level of which has been assessed as adequate

by the European Commission, and to US companies who have joined the Privacy Shield data protection framework.

- If personal data is 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.
- 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 have access to and rectify personal data by contacting Hedon Spa&Hotel Customer Support.

Withdrawal of consent

- If personal data is processed on the basis of consent (the Hedon Fan Club loyalty programme and newsletter), you have the right to withdraw your consent at any time by notifying Hedon Spa&Hotel Customer Support of this by email.

Storage

- Personal data, which is used for the provision and management of bookings and services, is stored for three years.
- 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) are stored for two years.
- In the case of payment disputes and consumer disputes, personal data is stored until the fulfilment or expiry of the claim.
- If a person grants their consent to their data being stored for the loyalty programme, the data shall be stored until the person joins the loyalty programme, and then the personal data shall be transferred to the loyalty programme.
- The personal data under the Hedon Fan Club loyalty programme (including the history of usage of Hedon Spa&Hotel services) is stored until the end of the programme or withdrawal of the consent.

- Personal data necessary for accounting is stored for seven years.
- If personal data is 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.

Erasure

- In order to have your personal data erased, you need to contact Hedon Spa&Hotel Customer Support. Customer Support will verify your identity and inform you of the erasure of personal data.

Portability

- In order to have your personal data transmitted from one system to another, you need to contact Hedon Spa&Hotel Customer Support. 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 direct marketing messages, you should select the relevant link at the bottom of the e-mail or contact Customer Support.
- With regard to the processing of Hedon Fan Club personal data (profiling), you have the right to file objections at any time by notifying Customer Support of this by e-mail.

Settlement of disputes

Disputes related to the processing of personal data are resolved via Hedon SPA & Hotel Customer Support at info@hedonspa.com. The supervisory authority is the Estonian Data Protection Inspectorate (info@aki.ee).