

PERSONAL DATA PROTECTION POLICY

Prestige 2000 EOOD (hereinafter referred to as the *Hotel* and / or the *Company*) is a company entered in the Commercial Register and the Register of Non-Profit Legal Entities, maintained by the Registry Agency with UIC 102668743, with registered office and address management: Burgas, p.k. 8000, 20 Tsar Simeon I Str., Tel: 0884305103 e-mail: office@complex-boriki.com, as a data administrator, processes your personal data using the website www.complex-boriki.com, named after - below the "Site" or "Website" or on site in the complex "Boriki", in accordance with applicable regulations on personal data protection, including Regulation (EU) 2016/679.

This personal data protection policy regulates how personal data will be collected, processed and stored in order to meet the standards of the Administrator's organization and to comply with legal requirements.

I. Definitions:

' Personal data controller' means a natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by EU law or the law of a Member State, the controller or the specific criteria for determining it may be laid down in EU law or in the law of a Member State.

"Processor of personal data" means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller

"Processing of personal data" means any operation or set of operations carried out with personal data or a set of personal data by automatic or other means such as collecting, recording, organizing, structuring, storing, adapting or modifying, retrieving, consulting, using, disclosing by transmitting, disseminating or otherwise making the data accessible, arranging or combining, restricting, deleting or destroying it.

"Personal data" represent any information relating to a natural person by which he or she can be identified.

"Consent to the processing of personal data" is any freely expressed, specific and informed statement of intent by which the individual to whom the personal data relates unequivocally agrees to be processed under the conditions and in the manner specified in this Privacy Policy and General Terms of the Site.

" Data subject" is any natural person who can be identified, directly or indirectly, by an identifier / name, identification number, etc./.

"Third party" means a natural or legal person, public authority, agency or any other body other than the data subject, the controller, the processor and persons who, under the direct supervision of the controller or the processor, have the right to process personal data.

II. Our attitude to your personal data

The company attaches great importance to the protection of personal data and collects and processes personal data only in compliance with local and European legislation. The purpose of

this "Privacy Policy" is to inform you how we process your data and what personal data we would collect about you, for what purpose, term and resp. what are your rights.

The security of the data you entrust to us is very important to us. Therefore, we protect your data by applying all appropriate technical and organizational means that are adequate to the possible risks to the rights and freedoms of individuals to prevent unauthorized access, unauthorized or malicious use, loss or premature deletion of information.

III. What information do we collect about you?

Depending on the specific goals and grounds, **Prestige 2000 Ltd.** processes the following data individually or in combination with them, namely:

A) Provided by you data necessary for identification and execution of your made and confirmed hotel reservations, such as:

- three names, telephone number, e-mail address for contact with you, or a contact person specified by you, date and time of accommodation and departure, children and their age;
- data collected upon payment made to us - credit or debit card number, bank account and other information collected during and processed in connection with the payment by bank transfer, direct debit or Post-terminal;
- data from your account for access to our online booking platform - username, history of reservations and payments;
- data about the services you use and the information obtained through them about your preferred destinations, hotels and services offered by us;
- other data you provide to us in connection with the services already used or your preferences for our complex.

B) Data provided by you and stored by Prestige 2000 Ltd. in the process of providing on-site accommodation services at the hotel, which data are collected, processed and stored in accordance with applicable regulations on keeping a register of accommodated tourists by persons operating hotel business, namely: names, PIN / for Bulgarian citizens / or LNC / for foreign citizens with a residence permit in BG /, or date of birth / in all other cases /, gender, nationality, ID card number / valid national identity document, country that issued the national document; contact details: address, email address, phone number, etc .; financial information - bank account data, etc .; information about site visits, as well as other categories of data.

C) Other:

- Digital data - videos. These are the data collected through the video surveillance systems used by Prestige 2000 Ltd. in all publicly accessible places in the complex (reception, bistro, corridors, SPA area, entrances, parking and external parts of the hotel), for security, surveillance, control and protection of public order.
- IP address when visiting our website / our online booking platform, log-in information, browser type and version, time zone setting, browser plug-in type and version, operating system, device type, mobile device brand; this data may be collected and processed on our behalf by third-party cookies, data about your visits, such as URL, information about activities performed through and from the website (including date and time), information you

have viewed or searched for (including the most read articles, the most visited content and categories, the most viewed products, the response time on the page, loading errors, duration of visits to certain pages (including average time spent on certain pages viewing specific content or videos), average length of time spent in an application and number of views in the application, average number of articles, viewed on the website, information about page activity (such as viewing, clicking, moving the cursor), methods used to view the page, user behavior data, phone number or email used to contact us. we receive your personal data from third parties - business partners, contractors of technical, payment and other services, advertiser and, analytics service providers, etc., for example when you visit one of our websites, we may receive your personal data from a third party social network if you have voluntarily chosen to access our website through the relevant social network platform.

- Data in connection with a complaint regarding the tourist service provided by us and used by you;
- information about the type and content of your reservation, as well as any other information related to it, including e-mails, letters, requests, requests, complaints, grievances and other feedback we receive from you;

The company does not store or process special categories of data within the meaning of Art. 9 and Art. 10 of the Regulation, such as data revealing racial or ethnic origin, political views, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data on health, sexual life or sexual orientation. When, at your request and without our request, you have voluntarily provided us with personal data using the website (including sensitive personal data, eg by sending sensitive personal data in a comment on our website), we will delete this personal data from our systems if we consider that we do not need to process them for a lawful purpose unless you have made this data publicly available (eg through a public message on the website), in which case we will only delete this data from our website if required to do so. by law or if we do not want to keep them.

I V. _ Term of storage of personal data

The length of time your personal data is stored depends on the purposes for which it was collected. PRESTIGE 2000 Ltd. stores your personal data for a period not longer than the requirements of applicable law for the relevant period.

Accounting and commercial information, as well as all other information and documents relevant to taxation and compulsory social security contributions are kept by the company within the following time limits:

- Registration data (such as name, surname, e-mail address) and information about the registration - date, time) - for the entire period of contract and up to 5 years thereafter. The data identifies the entity as a party to the Service Agreement. In order to resolve possible disputes that have arisen or become known after the provision of the services, these data are stored for a period of up to 5 years, unless a longer period is required by law.
- payroll - 50 years. The data is stored on a legal basis in order to protect the social and pension rights of employees before or now.

Privacy policy of "PRESTIGE 2000" Ltd.

- accounting records and financial statements - 10 years. The data is stored for tax and insurance purposes.
- documents for tax and social security control - 5 years after the expiration of the limitation period for repayment of the public debt to which they are related;
- all other carriers - 5 years, insofar as the law does not provide for a shorter period.
- video surveillance recordings - 30 days.

Your personal data provided during your registration on the website is stored and processed for the period of registration until you request deregistration and deletion of your account.

If the grounds on which we store your personal data cease to exist (for example, if we cease to have a legitimate interest in storing your personal data, if the statutory period for storing your personal data has expired or if you have withdrawn your consent to store your personal data), information (paper or technical) that is not subject to transmission to the National Archives may be destroyed. After the end of the storage period, the data shall be destroyed as soon as possible by destroying the paper media by shredding, and the technical media - by deleting and deleting the relevant files from the computers and systems of the Company.

The storage of personal data for longer periods is possible to protect the legitimate interests of "Prestige 2000" Ltd., as well as until the expiration of the statute of limitations in order to protect any claims of customers in connection with the implementation / termination of travel services. accommodation and meals in our hotels, as well as for a longer period in case of a legal dispute that has already arisen - the documents are stored until its final resolution by a court decision entered into force.

We are responsible for the protection of personal data of the client, which became known to us in connection with our activities as a hotelier and in providing our travel services specified in the subject of the General Terms and Conditions and this Policy, except in cases of force majeure, accidentally event or malicious actions of third parties, as well as in cases where the client has made this information available to third parties.

V. Purposes, manner of use of personal data

A) We process and store personal data that are minimally necessary and legally required for the purposes of providing tourist accommodation and catering services, as well as for all other services provided on site in our hotels such as:

- Identification of a client in: making, changing and terminating a reservation, as well as in the provision of tourist accommodation and catering services, as well as all other services provided on site at our hotel. The identification of a client is done through all trade and communication channels - at the reception of the Hotel by providing an identity document, by phone, on our online platform through an electronic contact form, by e-mail, etc .;

- Update of your personal data or information about services in our hotel according to your request for correction / change of data / services;
- Service and response to customer complaints / inquiries / complaints. Adjustments of amounts due on already realized reservations for accommodation and meals in the presence of grounds for this;

B) We process your personal data in order to provide technical assistance in registering, maintaining and changing your profile, in order to make a reservation, in order to fulfill a reservation, in order to identify a customer - concluding a new or modifying an existing reservation, explanations for the used services; in order to prepare proposals for concluding contracts; to recover a forgotten password to access our site, to electronically service electronic invoices. As well as when we have to comply with and fulfill our legal obligation; where this is necessary for our (or a third party's) legitimate interest (eg to detect and prevent fraud or to provide IT security), except where your fundamental interests or fundamental rights and freedoms take precedence over such interests; when it is necessary to protect your vital interests (or the vital interests of another); and / or when necessary in the public interest or for the exercise of official authority.

IN) We process your personal information for various technical, administrative and operational reasons, such as: to ensure that the content is presented in the most effective way for you and your device, to improve the website, including its functionality, to administer the website, for internal operations, including troubleshooting and technical problems, data analysis, testing, research, statistical purposes and research, for advertising and marketing, including profiled marketing purposes, so as to provide content that can be larger interest to you, and as part of our efforts to keep our website safe and secure.

D) PRESTIGE 2000 Ltd. processes your data for the purposes of our following legitimate interests: for the purposes of direct marketing - sending offers containing information about our current offers, promotions and discounts for accommodation in our hotel and / or change in the conditions of already used ones;

In some cases, we will process your personal data only with your consent. In these cases, when you provide your personal data, we will separately ask for your explicit consent. You will be able to withdraw your consent at any time. However, this will not affect the lawfulness of the data processing prior to its withdrawal. The provision of personal data is necessary when they are required to fulfill legal or contractual obligations. If this personal data is not provided, we will not be able to manage our contractual relationship or fulfill our obligations. In all other cases, the provision of personal data is your choice and you are not obliged to provide it.

VI . To whom and when can we disclose your personal data:

We do not sell your personal data to third parties. Personal data may be provided to third parties only in the following cases: when provided by law; if duly requested by a competent state or judicial authority; when the company has received explicit consent to this; when this is necessary for the protection of the rights and legitimate interests of the company.

The data may be provided to third parties in order to fulfill our obligations arising in connection with contracts concluded with you. If your data is provided to third parties, you will be notified.

We may need to share your information with hosting and other service providers who assist us in providing our services. These providers will act only on our instructions, will be subject to prior verification and will assume contractual obligations containing strict clauses regarding the protection of personal data. We strive to ensure that these third parties use personal data only for lawful purposes in accordance with this Privacy Policy.

We may need to share your information with courier companies. In this case, only the data necessary for the delivery will be provided.

When choosing the partners we work with, we make every effort to select the appropriate and appropriate partner and to protect your personal information.

VII . How we protect your personal information

It is extremely important for us to guarantee the quality and integrity of the data provided. To this end, adequate technological and organizational measures have been taken, which contribute to the protection, accuracy, timeliness and completeness of the data.

All information you provide to us is stored on secure servers and on paper, in accordance with applicable regulations regarding the keeping of a register of tourists accommodated by persons engaged in hotel business . We apply the appropriate technological and organizational measures necessary to protect your personal data and the appropriate level of protection, which ensures the confidentiality and integrity of data and prevents the destruction, loss, unauthorized alteration or unauthorized disclosure of personal data.

VIII . Confidentiality of children's personal data

The services offered by Prestige 2000 EOOD are intended only for adults over the age of 18. Reservations and other services are NOT provided by Prestige 2000 EOOD to minors.

We do not knowingly collect personal information from individuals under the age of 16 on the website. If a parent or legal representative knows that his or her child has provided us with personal information, he or she must inform us immediately. If we find that a person under the age of 16 has provided us with personal data, we will destroy this information from our servers immediately, unless explicit consent is given by the parent or guardian to process the child's personal data for certain purposes.

IX . Cookies and tracking

We use cookies to make your visit to our site more enjoyable and to enable you to use certain features on different pages. These are small text files that are stored on the end device from which you visit our site. Some session cookies are deleted when you close your browser. Other cookies remain on your end device and allow us or partner companies to recognize your browser the next time you visit ("persistent cookies"). You can set your browser to be aware of the setting of cookies and decide to accept them individually or turn off the acceptance of cookies

for specific cases or in general. You can find additional information in the help section of your internet browser. Rejecting cookies may limit the functionality of our website. We distinguish between system cookies and promotional cookies. System cookies are necessary for the proper functioning of our website. Rejecting these cookies will change your user experience when browsing our website and certain services on our website will not be able to be used. Promotional cookies are stored as we load the site and help us analyze aggregate data about our visitors - such as how they get to our site, how much time they spend on it, whether they visit us for the first time, how you view our site content, and to draw conclusions about the success of our marketing campaigns.

You may block or remove cookies using your browser or third party software, but this may prevent you from using certain areas of the website.

Processing is based on your consent, expressed on our website or through the settings of your browser.

You may withdraw your consent to the use of Cookies at any time. To do so, please contact us using the contact details below.

X. _ Links to other websites

Our website may provide links to websites that are not under our control. Once you click on a third-party link, you will be directed to that third-party's website. If you visit any of these websites, you should review their privacy policies. We are not responsible for the policies and practices of other companies.

XI . Your rights

According to the Regulation, any natural person whose data are processed or stored by a personal data controller has the following rights:

- To be informed in detail about the processing of his personal data in connection with the activities carried out by the company
- To receive confirmation whether his personal data are processed, access to them and information about their processing and his rights in this regard.
- Correct your personal data in case it is incomplete or inaccurate.
- To request the deletion of data, except in cases where there is a substantial reason and / or legal obligation for their processing.
- To limit the processing of his personal data, if there are grounds for that, provided in it.
- Request the Personal Data Controller to notify third parties when he / she has provided his / her data regarding the correction, deletion or restriction of the processing of his / her personal data.
- To receive the personal data provided by the company and which relate to it, in a structured, popular format, suitable for machine reading, as well as to use this data for another administrator at its discretion.
- The right not to be the subject of a decision based solely on automated processing, including profiling, which has legal consequences for it or similarly affects it significantly, unless

the grounds provided for in the applicable data protection legislation are met for this, appropriate guarantees are provided for the protection of his rights, freedoms and legitimate interests.

- At any time, to withdraw his consent to the processing of personal data, which is based on his prior consent. Such withdrawal shall not affect the lawfulness of the processing on the basis of the consent given until its withdrawal.
- To object to data processed on the basis of a legitimate interest.
- File a complaint with the supervisory authority if it considers that the processing of personal data concerning it violates the applicable data protection legislation.

The supervisory body in the Republic of Bulgaria is the Commission for Personal Data Protection, address: Sofia 1592, Blvd. "Prof. Tsvetan Lazarov "№ 2.

XII . Contact data

If you have any questions or concerns regarding the processing of your personal data or wish to exercise any of your rights, you may contact us in the following ways:

Address: Varna, 54 Osmi Primorski Polk Blvd., 2nd floor, office 3,

Email: office@complex-boriki.com ;

phone: 0884 305 103

We may update this Privacy Policy from time to time and will notify you by posting new policies on the Website. Please review the current rules for future changes.