

# PRIVACY POLICY

## Information on the collection and processing of personal data

Mirana Luxury Villas, i.e., legal entity MIRANA Ltd. (which manages Mirana Luxury Villas) (hereinafter referred to as the "Company") pays great attention to the protection and processing of personal data. In the performance of its registered activities, the Company processes personal data while respecting all relevant laws and regulations.

(1) The Data Controller responsible for data processing is:

MIRANA d.o.o.

Trg žrtava fašizma 6

10000 Zagreb

Croatia

(2) The Data Protection Officer (DPO):

email: [info@miranaluxuryvillas.com](mailto:info@miranaluxuryvillas.com)

(3) If external service providers are used for processing your personal data ("Data Processors"), it is a processing (of personal data) on behalf of the Company. In that case, we are also responsible for the protection of your personal data. We do not use service providers outside the EU for the processing of your personal data. However, if necessary, we will do so only if there is a European Commission decision on adequacy for that third country or if we have agreed with the service provider as the Data Processor to provide appropriate safeguards or comply with binding regulations on the protection of personal data.

This Privacy Policy (hereinafter referred to as the "Policy") describes the information we collect, how we process it, and the purposes for which we use it, as well as your rights related to your data. The purpose of this Policy is to inform you about all relevant aspects of collecting your personal data, their processing, and storage. This applies to all personal data that you have provided to us through electronic, written, or verbal communication, or that has been provided to us through a tourist agency and/or other group if you are in a contractual or similar relationship with them, as well as data collected from other sources.

## **Personal data we collect**

### **We process the following personal data:**

- a) Your basic personal data that you or third parties provide to us when making a reservation - Name, surname, country and city, address of residence, email address, phone number, child's age, child's name and surname, and date of birth, special requests and preferences, and the data of your companions; data necessary for executing the reservation - credit card number, emergency contact information - name and surname, phone number; other necessary data - email address.
- b) Guest check-in and check-out - Name and surname, date of birth, gender, personal document number (identity card, passport, driver's license), credit card number, country of birth, nationality, visa number if the guest is subject to a visa regime, border crossing or the place of entry into the Republic of Croatia, guest's arrival date at the property, and departure date.
- c) In-villa services usage - guest consumption data during their stay in the villa. Data on the type of service provided and its price are collected, for example: room service, phone call list, minibar usage, private chef and catering service, bicycle rental, boat rental, home delivery, etc.
- d) Monitoring and improving service quality - name and surname, gender, age, country of origin, and duration of stay in the villa, rating of a specific type of service, comment. Data collection is voluntary.

The Company determines the purpose and means of personal data processing and is considered the data controller in that regard. The primary purpose of collecting personal data is a legal obligation and/or the conclusion and execution of contracts for accommodation and hospitality services or to take actions at your request before and during the contract. The scope of personal data we collect depends on the type of contract you intend to conclude or have concluded or the request to exercise rights (type of service provided and price). Actions taken at your request before entering into a contract involve checking your requests and needs, as necessary, assessing the suitability or appropriateness of products and services to your specific circumstances, all with the aim of preparing an offer and/or an informative calculation. If you are not a contracting party but a person exercising a right under a contract for allotment, a contract with a travel agency, or similar, the purpose of collecting your personal data is to fulfil the Company's obligation arising from the

concluded contract, or the collection of your data is necessary to conclude the contract or identify service users, for example, in the case of internet platforms for online reservations. In this case, the scope of personal data we collect depends on the type of request submitted and the information required to fulfil the request. The purpose of processing personal data may be the Company's obligation to fulfil contracted services with such service providers.

We process your basic personal data, as well as data from guest check-in and check-out, based on the legal obligation to enter them into the eVISITOR system, in accordance with regulations on tourist registration and the form and content of the tourist registration form to the tourist board and the Tourist Tax Act, or for the needs of the Ministry of the Interior in accordance with the Foreigners Act, and providing the mentioned data is necessary for making a reservation (in the case of amendments and additions to regulations and/or new regulations, they directly apply to this Information as well). We delete this data after transferring it to the eVISITOR system or after submitting the data to the Ministry of the Interior.

Therefore, the collection of personal data, considering the defined purpose, represents a legal and contractual obligation and a necessary condition for the conclusion of a contract. If you refuse to provide certain data, we will not be able to fulfil our legal or contractual obligations, resulting in the inability to conclude a contract for accommodation and hospitality services or the inability to fulfil the obligations under the contract.

The data necessary for the execution of the contractual obligation to use our services are required to confirm the reservation by advance payment, in accordance with the Company's internal rules, and it is not possible to make a reservation and thus conclude the aforementioned accommodation service contract without disclosing this information, which is kept until the termination of the accommodation service contract.

The credit card number is collected because it is necessary for the conclusion and execution of the contract with the guest. It is used as a guarantee for payment of accommodation costs and other services that may arise in case the guest fails to settle the debt with the Company. The provided data is also used for payment purposes.

Data regarding the use of our services are collected and processed for the purpose of fulfilling the contractual obligation. Guest consumption data during their stay at the villa is also collected for the purpose of fulfilling the contract with the guest and issuing invoices for the provided services.

Emergency contact information is processed based on legitimate interests, i.e., potential situations when it is necessary and urgent to transmit certain relevant information to persons close to you (in case of extraordinary circumstances such as illness, accidents, etc.). Other necessary data, such as email addresses, are processed based on legitimate interest in quality communication between contracting parties for the purpose of fulfilling all aspects of the contract or facilitating communication regarding your arrival and reservation of accommodation, and we delete this data upon termination of the accommodation service contract.

### **Special categories of personal data**

In principle, the following types of personal data are not processed: data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying an individual, and data relating to an individual's health, sex life, and sexual orientation.

The above-mentioned categories of personal data may be processed by the Company in the following situations: 1) the guest has given explicit consent for the processing of such personal data for one or more specific purposes, unless applicable laws state that such consent does not have an effect; 2) the processing is necessary to protect the vital interests of the data subject or another individual if the guest is physically or legally incapable of giving consent; 3) the processing relates to personal data that the guest has clearly made public; 4) the processing is necessary for the purposes of a substantial public interest based on applicable laws, which respects the essence of the right to data protection and provides appropriate and specific measures to safeguard the fundamental rights and interests of the data subject; 5) the processing is necessary for preventive medicine, medical diagnosis, the provision of health or social care or treatment, or the management of health or social systems and services based on applicable laws.

All your personal data that you or a third party have provided to us will be processed in accordance with the purpose of their processing (note that if you are traveling with children under the age of 16, their personal data, regardless of the basis, will be processed only with your explicit consent).

There is a possibility of using an internal network of surveillance cameras and other security measures in our facilities, through which guests' images may be captured or recorded and information related to your location while you are in our facility (through key cards and other technologies), all for the legitimate interest of maintaining security.

### **Links to third-party websites and services**

Our website and mobile applications, as well as our Wi-Fi network, collect data on your usage for billing purposes and contain links to third-party websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by those third parties. If you provide data on third-party websites or use them, the privacy policies and terms of use of those websites apply. We recommend that you read the privacy policies of the websites you visit before providing personal data.

The Company will take all reasonable measures to protect your personal data from unauthorized access, disclosure, alteration, or destruction and to keep the personal data as accurate and up to date as possible. We require our partners and service providers with whom we share personal data to make reasonable efforts to maintain the confidentiality of your personal data. For online transactions, we apply a reasonable level of technological measures to protect the personal data you share with us through our website. However, it should be noted that no security system or system of transmitting data over the Internet can guarantee complete security.

### **Legitimate interests of the Company as the purpose of processing personal data**

We will process your personal data for the purposes of our legitimate interests unless your interests or fundamental rights and freedoms that require the protection of personal data take precedence over those interests. The Company's legitimate interest in this regard is the processing of personal data in order to fully adapt our service to your needs and desires. We may also use this data for our internal statistical and analytical purposes.

You can object to this legitimate interest of the Company at any time, and in that case, we will no longer process your data for that purpose, without affecting the lawfulness of the processing prior to withdrawal. In any case, for direct marketing, we must have your explicit consent.

## **Consent**

Consent is the legal basis for collecting personal data for the purpose of service quality monitoring.

In case of providing marketing consent for which we request your explicit consent, your personal data may exceptionally be subject to automated processing for the purpose of creating your profile for the analysis of provided services and achieved rights, as well as for the purpose of improving the quality of the business relationship. Automated decision-making, including profiling, will be carried out in cases of creating your customer profile for the analysis of provided services and achieved rights, as well as for the purpose of improving the quality of the business relationship and processing data based on consent for marketing purposes in order to improve the quality of the business relationship and marketing, and to provide you with targeted information about benefits and updates from our offer. If such processing of personal data is not necessary for the conclusion or performance of a contract, you have the right to request that a person employed by the Company make a decision on the outcome of the processing, the right to express your own position, and the right to challenge a decision made through automated processing. We also emphasize that the use of your personal data for marketing purposes is possible only based on your explicit consent. If you provide us with the mentioned consent, we will inform you in a timely manner about all benefits, discounts, events, and related services that we believe may be of interest to you. You can withdraw the mentioned consent at any time by notifying us through the contact provided in the introduction of this Information.

## **Recipients of your personal data**

The Company ensures that your personal data is processed only for the purposes stated in this document. The purpose of processing personal data will require the disclosure of your personal data and their processing by other companies and individuals acting as data processors. Categories of data processors to whom your data will be disclosed include state and public authorities in accordance with the Company's legal obligations, healthcare institutions, providers of IT and legal services, delivery service providers, and similar entities. Collected personal data may be forwarded to entrepreneurs who provide services that may be of interest to you, in accordance with your request (e.g., regarding bike rental, boat rental, etc.).

Data processors, with the exception of state and public authorities, process the data solely according to the Company's instructions, while respecting technical and organizational measures to ensure the protection of your rights.

### **Where will your personal data be processed**

The processing of your personal data will take place within the European Economic Area (it may exceptionally take place outside the European Economic Area), but in any case, it will be carried out by data processors whose responsibilities and obligations for the protection of personal data and applicable technical and organizational measures for protection are determined by the contractual relationship in accordance with all legal regulations governing the protection of personal data.

### **Retention period of personal data**

Your personal data will be stored only for as long as necessary to fulfil the purpose for which they are processed. The retention period of personal data depends on the purpose of collection. If it concerns the conclusion of accommodation contracts, in-villa services, and the provision of hospitality and tourism services, that period will be determined by the duration of the contract itself or the collection of fees for those services, in terms of the legal obligation to keep records. The extension of this period is determined by the Company's internal rules, which depend on the legally prescribed limitation periods for claims, or these periods may be extended in accordance with legally defined retention periods, such as in the case of accounting documents.

### **Rights regarding collected personal data**

Regarding the data you have disclosed to us, you have the following rights: (I) the right to access the personal data being processed, (II) the right to rectify or erase personal data, (III) the right to restrict processing, (IV) the right to object to processing, (V) the right to data portability, (VI) the right to withdraw consent, and (VII) the right to lodge a complaint with the supervisory authority. To exercise any of these rights, simply notify us using the contact details provided in the introductory part of this Information.

### **Right to lodge a complaint with the supervisory authority**

At any time, you can lodge a complaint regarding the processing of your personal data with the competent supervisory authority in accordance with the Law on the Implementation of the General Data Protection Regulation or other applicable regulations governing the protection of personal data and specifying supervisory powers concerning the processing of personal data.

### **Other information**

We may periodically update this Information. All amendments to the Information will become effective upon the publication of the modified Information on the website.

This Information on the collection and processing of personal data is in accordance with EU Regulation 2016/679 of the European Parliament and the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data, dated April 27, 2016 (General Data Protection Regulation - GDPR), as well as the Law on the Implementation of the General Data Protection Regulation (Official Gazette 42/2018).