

S.C. ANNAPOLIS TOUR S.R.L.
Str. Gheorghe Baritiu 18
BRASOV, ROMANIA
C.I.F.: RO 38461850
R.C.: J8/3056/2017



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www.residencecentral.ro
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INFORMATIVE NOTE ON PERSONAL DATA PROTECTION

In accordance with the requirements of Regulation (EU) 2016/679/27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, the company **ANNAPOLIS TOUR SRL** has the obligation to manage safely and only for the specified purposes, the personal data you provide us about you, a member of your family or another person.

ANNAPOLIS TOUR SRL collects and processes personal data for the following purpose:

- a) Commercial activities related to accommodation and provision of services (restaurant – bar, events, related services), including offering, contracting, selling products, commercial relations with other legal entities;
- b) Post-sale activities including customer service, informing them about the evaluation of the products and services offered, improving the quality of the repair services and maintenance of the products and services marketed by the performed activity;
- c) Activities related to the fulfillment of the legal provisions regarding the drawing up and reporting of specific documents (eg: the accommodation card) and accounting (accounting statements, invoices, etc.);
- d) Activities related to your safety and your goods;
- e) Legitimate interest pursued by Annapolis Tour SRL or a third party (eg: in the case of the prevention of bank card fraud);
- f) To resolve your requests related to **ANNAPOLIS TOUR SRL** activity;

Your data is necessary for the purpose of carrying out the activity. Your refusal to provide certain data may cause the impossibility of providing the services or goods requested to **ANNAPOLIS TOUR SRL**.

The recorded information is intended for use by **ANNAPOLIS TOUR SRL** and are communicated only to the following recipients: the designated employees of the company, the person concerned, the contractual partners of the company, other companies from the same group as **ANNAPOLIS TOUR SRL**, the banking companies where clients have opened accounts and communicated to **ANNAPOLIS TOUR SRL**, public institutions authorized to process personal data (eg ANAF, Ministry of Interior through the Romanian Police, Ministry of Tourism, etc.).

ANNAPOLIS TOUR SRL also collects data for purposes of marketing or advertising, but only with your express consent. This is done either by accessing our sites and completing the data in the newsletter field either through an express agreement signed with one of our employees or collaborators.

You can always withdraw this consent and enjoy the Annapolis Tour services.

Under Regulation (EU) 2016/679/27 April 2016, you benefit from:

- the right to transparency,

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- the right to be informed,
 - the right of access to data,
 - the right to rectification,
 - the right to delete data (the “right to be forgotten”) *
 - the right to restrict the processing,
 - the right to data portability,
 - the right not to be subject to an automatic decision (including the creation of profiles),
- the right to appeal to the justice / ANSPDCP.

For the exercise of these rights, you may address us with a written request, dated and signed at **ANNAPOLIS TOUR SRL** from Loc. Braşov, Str. Gh. Baritiu, no. 18, Braşov, Romania, or through email at office@residencecentral.ro.

Data is collected directly from you, family members, empowered, or in working relationships. They are collected either directly (eg by filling in the accommodation form or by email sent by you) or through our collaborators (eg: you make a booking through specialized applications such as Trivago or travel agencies). There are cases when data is provided in a business relationship with the company you are working with or collaborate with (eg: when traveling on business or organizing an event with a nominal guest list).

We also collect data through cookies, but they can be easily blocked by your browser settings.

In the establishments of **ANNAPOLIS TOUR SRL** there is a video surveillance system. It supervises the common areas, as required by the relevant legislation. The image storage period is 30 days.

If your data is transferred to the territory of the European Union or other non-EU countries (for example on the basis of trade relations with travel agencies or specific booking applications), we ensure that they also comply with the legal provisions on data protection and there is a legislation compatible and accepted by the European Union. For more details on personal data processing, please visit one of our sites and discover the Privacy Policy and Cookie Policy section, or request a copy at the accommodation unit reception.

Note:

* any person has the right to oppose, for legitimate reasons, to the processing of data concerning him / her. This right of opposition may be excluded for certain processing provided by law (eg: processing by financial and fiscal services, police, justice, social security). Therefore, this mention can not figure if the processing has a mandatory character;

* any person also has the right to oppose, free of charge and without any justification, the processing of his or her personal data for direct marketing purposes.

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PRIVACY POLICY

Date of entry into force: May 2018

This Privacy Policy applies to a www.residencecentral.ro, owned and operated by Annapolis Tour S.R.L., based in Brasov, Gh Baritiu Street no. 18, Brasov, phone / fax +40 755 058 888, email office@residencecentral.ro.

Through this Privacy Policy, we explain how we collect and use the information, which may include the personal data you provide on our website: www.residencecentral.ro.

Annapolis Tour SRL carries out accommodation, bar-restaurant, organization of events activities, as well as services related to such activities as (concierge, hotel-airport transport etc.).

Data Collection

Among the types of personal information we collect are:

- Your first name, your name, your email address, your phone number and your address;
- Information about your nationality;
- Bank card details (card type, credit card number, card holder's name, expiration date and security code);
- Customer stay information, including arrival and departure dates, special requests, comments on your service preferences (including preference for room type, facilities or any other services used);
- The information you provide about your marketing preferences or when you participate in polls, contests, or promotional offers;

The purpose of data collection

Your data is collected for the following purposes:

- **Reservations:** We use your personal data to complete and manage your reservation made online or offline.
- **Customer Service:** We use your personal information to provide you with the required service.
- **Guest comments:** We can use your contact information to invite you by email to write a guest comment after your stay. It can help other travelers choose the accommodation that suits them best. If you submit a comment, it can be posted on our website.
- **Marketing activities:** We also use your data for marketing activities, as required by law. If we use your personal data for direct marketing purposes, such as commercial newsletters and marketing communications on new products and services or other offers that we believe might be of your interest, we will include a unsubscribe link that you can use if you do not want us to send you any more messages.
- **Other communications:** There may be other times when we get in touch by email, mail, phone or SMS, depending on the contact information you share with us. There may be a number of reasons for these communications:
 - a. We may have to respond and resolve the requests you have made.
 - b. If you have not completed an online booking, we may send you an email with a reminder to continue your booking. We believe this additional service is useful for allowing you to continue booking without the need to look again for accommodation or to fill in all the details of the reservation from the beginning.

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c. When you use our services, we can send you a questionnaire or invite you to write a comment about your experience on our website or our partners. We believe this additional service is useful for you and for us because we can improve our website based on your feedback.

• **Analysis, Improvement, and Research:** We use personal data to conduct research and analysis. We may involve a third party to do so on our behalf or have the obligation to pass on this information to accredited institutions (eg: the Ministry of Tourism). We may share or disclose the results of such research, including third parties, in anonymous, encrypted form. We use your personal data for analytical purposes, improve our services, improve user experience and improve the functionality and quality of our online travel services.

• **Security, Detection, and Fraud Prevention:** We use information that may include personal data to prevent fraud and other illegal or infringing activities, the use of stolen cards, etc. We also use this information to investigate and detect fraud. We can use personal data for risk assessment and security purposes, including user authentication. For these purposes, personal data may be shared with third parties, such as national or international authorities accredited under the law or external consultants.

• **Legal Reasons:** In some cases, we must use the information provided, which may include personal data, to resolve legal disputes or complaints, investigate and comply with the regulations, or to enforce an agreement or comply with legal requirements in the part of the law enforcement bodies insofar this is provided by law (eg: the communication of the accommodation sheets to the representatives of the Ministry of the Interior through the Romanian Police Service).

You can always choose which personal data (if any) you want to provide us. However, certain personal data, such as those required by law, are strictly necessary for the conduct of business, which is why we can not provide the requested service in their absence.

Data processed for marketing purposes is processed only on the basis of your express agreement, which can be withdrawn at any time.

Data processed for statistical, research and analysis purposes are anonymized data that does not allow us to identify you in any way.

Form of data collection

Personal data is collected by one of the following methods:

- a) Directly from the person concerned, through the accommodation form, the requests issued in the case of a reservation request (offline or online) or through direct communication;
- b) Through our collaborators, travel agents or specific reservation applications;
- c) By requests of the persons mandated by you;
- d) Through our website, based on user preferences, while browsing the web page through cookies. For more details on the **Cookies Policy**, please click [here](#).

If we use automated means to process personal data that have legal effects or affect you significantly, we will implement appropriate measures to protect your rights and freedoms, including the right to obtain human intervention.

International data transfers

Transmission of personal data described in this Privacy Policy may include transfers of personal data abroad to countries whose data protection laws are not as comprehensive as

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those of the countries of the European Union. Typically, these transfers occur when you work with travel agencies located in other non-EU countries (eg: Israel) through which you make reservations or through specific reservation applications through which you communicate your data but which have servers or central technology in other countries outside the European Union.

In these situations, we transfer personal data only to recipients offering an adequate level of data protection; so we make contractual arrangements to ensure that your personal data is still protected in accordance with European standards. You can ask us to see a copy of these clauses using the contact details below.

Security

Annapolis Tour SRL shall comply with reasonable procedures to prevent unauthorized access to, and misuse of, personal information. We use appropriate systems and procedures to protect information, including personal data. We also use security procedures and technical and physical restrictions for accessing and using personal data on our servers. Only authorized personnel are allowed access to personal data during the activity.

Data retention

We will retain your information, which may include personal data for as long as it is necessary to provide you with services, comply with applicable laws, settle disputes with any party and otherwise, if necessary, to enable us to conduct our activity, including detect and prevent fraud or other illegal activities.

For example, we have the obligation to keep the documents relating to financial transactions for 10 years from the end of the financial year in which they were processed, or the accommodation sheets are required to be archived for a period of 5 years, according to the relevant laws.

All personal data we keep will be subject to this **Privacy Policy**. If you have a question about a particular retention period for certain types of personal data that we process about you, please contact us through the contact details below.

Your options and rights

We want you to control how your personal data is used by us. You can do so in accordance with the provisions of **Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (Article 14-23)** in the following ways:

- You may request a copy of the personal data we hold about you;
- You can inform us of any changes to your personal data or ask us to correct the personal data we hold about you;
- In certain situations, you may ask us to delete, block or restrict the processing of personal data we hold about you or to oppose certain ways in which we use your personal data; and
- In some situations, you can also ask us to send the personal data you have given us to a third party.

If we use your personal data with your consent, you may withdraw this consent at any time under the applicable law.

If we process your personal data based on legitimate interest or public interest, you have the right to oppose your personal data at any time in accordance with applicable law.

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Please inform us promptly about any changes or inaccuracies in your personal details by contacting office@residencecentral.ro. We will resolve your request in accordance with the applicable law.

Questions or complaints

If you have any questions or concerns regarding the processing of your personal data or if you wish to exercise any of the rights you have under this notice, you are welcome to contact us by written request either at the address: **Gh Baritiu, no.18 Street, Brasov, Romania, for SC Annapolis Tour SRL** or by email at a office@residencecentral.ro. You can also contact your local data protection authority if you have any questions or complaints.

Changes to the notification

As our business is constantly changing, this Privacy Policy may change from time to time. If we make significant changes that will impact you (for example, when we start processing your personal data for purposes other than those specified above), we will contact you before starting this processing.

SC Annapolis Tour SRL