

# NOTICE TO GUESTS ON THE COLLECTION AND PROCESSING OF PERSONAL DATA

TURISTHOTEL d.o.o., Dražnikova ulica 78, Zaton, 23232 Nin, OIB: 74204012744 (hereinafter: Turisthotel) is the controller of your personal data. You can contact us by e-mail at [dpo@turisthotel.com.hr](mailto:dpo@turisthotel.com.hr) or by post at Dražnikova ulica 78, Zaton, 23232 Nin, Croatia.

In accordance with Article 6(1)(c) and (e) of Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation – GDPR), personal data may be collected for lawful purposes of processing, namely for the performance of a contract in which you, as the data subject, are a party, for compliance with the controller's legal obligations, on the basis of the controller's legitimate interest, or on the basis of your consent.

Your personal data are most frequently processed for the following purposes:

## 1. REGISTRATION IN THE EVISITOR SYSTEM

We collect and process your personal data based on legal obligations arising from applicable laws and regulations in the Republic of Croatia.

Croatian regulations require the accommodation provider (or a tourist agency authorized by the provider) to collect and enter the following personal data of a guest/tourist into the central **eVisitor** system for the registration and deregistration of tourists:

- First and last name
- Place, country, and date of birth
- Nationality
- Type and number of identity document
- Permanent or temporary residence and address
- Date and time of arrival at the facility
- Expected departure date
- Date and time of actual departure
- Gender
- Remarks
- Registration number

The relevant data are collected by the accommodation service provider, i.e. by us as the data controller, and processed by the accommodation provider in the hospitality facility, tourist boards, and public authorities of the Republic of Croatia for the following lawful purposes:

- **Monitoring compliance with the obligation to register and deregister tourists** by the obliged parties (accommodation service providers) pursuant to the Tourist Tax Act (NN 52/19, 32/20, 42/20) and the Ordinance on the eVisitor System (NN 43/2020);
- **Recording, calculation, and collection** of tourist tax pursuant to the Tourist Tax Act (NN 52/19, 32/20, 42/20) and the Ordinance on the Minimum and Maximum Tourist Tax Amounts (NN 71/2019);
- **Maintaining a guestbook or guest register** by the accommodation provider and monitoring compliance with this obligation by inspection authorities pursuant to the Hospitality Industry Act (85/15, 121/16, 99/18, 25/19, 98/19, 32/20, 42/20, 126/21, 152/24) and the State Inspectorate Act (NN 115/18, 117/21, 67/23, 155/23);
- **Registering foreign nationals with the Ministry of the Interior Affairs** and monitoring compliance with this obligation by inspection authorities pursuant to the Foreigners Act (NN 133/20, 114/22, 151/22, 40/25) and the Police Duties and Powers Act (NN 76/09, 92/14, 70/19);
- **Maintaining tourist records by tourist boards** and performing statistical processing and reporting pursuant to the Tourist Tax Act (NN 52/19, 32/20, 42/20) and the Tourist Boards and Promotion of Croatian Tourism Act (NN 52/19, 42/20);
- **Supervising the business operations of accommodation providers** with respect to the legality of performing the activity and providing registered services, as well as compliance with tax and other public levy regulations, pursuant to the State Inspectorate Act (NN 115/18, 117/21, 67/23, 155/23) and the General Tax Act (NN 115/16, 106/18, 121/19, 32/20, 42/20, 114/22, 152/24).

In accordance with Article 7 of the Ordinance on the eVisitor System, the collected personal data are stored for a period of 10 years, while statistical analyses and data are retained and stored permanently.

Since Article 6 of the Ordinance on the eVisitor System prescribes that data for the registration and deregistration of tourists are to be entered on the basis of information from an identity card, passport, or another identity document, the guest/tourist is obliged to present such a document to the accommodation provider and to provide all other information necessary for data entry that is not contained in the document, or to provide the required data by completing forms made available by the accommodation provider. Should you fail to provide the necessary data, we will not be able to provide you with accommodation services.

## 2. VIDEO SURVEILLANCE FOR THE PROTECTION OF PERSONS AND PROPERTY

We collect and process your personal data through a video surveillance system covering the indoor and outdoor areas where Turisthotel conducts its activities, based on legitimate interest, for the purpose of protecting persons and property and reducing the exposure of employees, visitors, and guests to the risk of robbery, burglary, violence, theft, and similar incidents related to the work, accommodation, or services of Turisthotel.

Through the video surveillance system, we process your personal data such as video recordings of your image, movements, hair color, vehicle license plates, and similar information.

Your personal data will not be processed for other purposes unless this is necessary for compliance with legal obligations (e.g. providing data to courts or law enforcement authorities) or if the processing is otherwise lawful under binding regulations.

Access to your personal data collected through the video surveillance system is restricted to specially authorized persons designated by the controller's responsible person and/or another legal entity authorized by us for the purpose of system maintenance and control. Third parties may need access to your personal data if required or permitted by binding regulations.

Recordings obtained through the video surveillance system will be kept for 30 days, unless a longer retention period is prescribed by law or if they are used as evidence in judicial, administrative, arbitration, or other equivalent proceedings.

## 3. RESERVATIONS AND ACCOMMODATION SERVICES

We collect and process your personal data for the purpose of performing a contract in which you, as the data subject, are a party, namely for making reservations and providing accommodation and other services, which are or may be necessary actions/pre-contractual steps related to the conclusion of a contract.

Reservations apply both to accommodation and to other services, such as restaurant bookings, sports facilities, kids' club, excursions, transfers, etc. In order to be able to offer you accommodation and other service reservations and to provide those services, we collect and process your personal data such as title, first name, last name, country of origin, e-mail address, telephone and mobile number, arrival time, flight number, vehicle license plate number, and similar details. These data are kept for 10 years.

For the purpose of guaranteeing a reservation when the guarantee is provided by credit card, it is necessary to enter card details such as card number, expiry month and year, as well as first name, last name, and CVV code. We do not collect card details ourselves; they are used exclusively for online payment processing via the Monri Payments system, for which the independent data controller is Monri Payments d.o.o., Ulica grada Vukovara 269F, 10000 Zagreb, OIB: 82551932122.

We require these data in order to identify you when using the services and facilities you have reserved, to ensure that your accommodation unit is ready and available on the agreed date, that the reserved service is accessible, and to enable us to calculate the service charges.

Providing the above personal data is a necessary condition for making a reservation and using accommodation services. You are not obliged to provide such data; however, in that case, we will not be able to offer you reservation and accommodation services.

## 4. NEWSLETTER SUBSCRIPTION

When you register to receive our newsletter, as the data controller we will ask you to provide information such as your e-mail address, language, first name, last name, preferred type of accommodation, children's age, purpose of stay, how you heard about the accommodation, preferred activities during your stay, and similar details. Among these, the e-mail address and language are the only mandatory data, since without them we will not be able to provide this service.

Through the newsletter, we inform users about our services and events for the purpose of keeping you updated and for Turisthotel's marketing activities. The legal basis for processing your data is consent. By entering your details when signing up for the newsletter, i.e. to receive information about our services and marketing activities, you give your consent to the processing of your personal data.

You may withdraw your consent at any time by sending a request to [info@zaton.hr](mailto:info@zaton.hr) or by following the unsubscribe link included in every newsletter e-mail you receive. We will retain your data until the consent is withdrawn. Withdrawal of consent does not affect the lawfulness of processing based on consent before it was withdrawn.

## 5. LOYALTY PROGRAM MEMBERSHIP

When you register for membership in the loyalty program, as the data controller we will ask you to provide information such as your first name, last name, e-mail address, and telephone number. We collect your data for the purpose of registering you as a member and enabling you to exercise rights to discounts and benefits, as well as for monitoring the manner and frequency of service use in order to improve and further develop our services, and for sending promotional materials about special benefits and offers.

At any time, you may request not to receive promotional notifications by sending a request to [info@zaton.hr](mailto:info@zaton.hr) or by following the unsubscribe link included in each e-mail you receive.

The processing of personal data for the purposes of member identification and applying discounts is necessary and based on the contractual relationship between the controller and the member. With respect to sending promotional materials, the legal basis for processing may, depending on the circumstances, be the contract, your consent, or the controller's legitimate interest in informing members about similar services and offers.

The controller will process members' personal data for the duration of their membership in the loyalty program, and after membership ends, such data will no longer be processed for this purpose.

## 6. SURVEYS AND PRIZE CONTESTS

We collect your data for this purpose only if you choose to participate in surveys or prize games/contests, and in such cases we process data depending on the type of survey or prize game/contest, about which you will be additionally informed in the surveys themselves and in the rules of the prize game/contest.

The data that may be processed include, for example, first name, last name, responses to survey questions, address for sending prizes, and similar information. Participation in surveys is voluntary, and by answering the questions you give your consent for the processing of the personal data you provide. You may withhold consent simply by not answering the questions.

Guests who complete a survey form to evaluate the quality of Turisthotel's services will often have the opportunity to participate in a prize game as well, which will be clearly indicated on the form itself. In such cases, the collected data will, on the basis of a contractual obligation, be

used for the purpose of conducting the prize game and awarding prizes, in accordance with the rules of the prize game.

Some data collected from participants in our prize games/contests (e.g., first name, last name, and e-mail address) may also, on the basis of legitimate interest, be used for direct marketing purposes to send you news about our offers and services that may be of interest to you. At any time, you may inform us that you no longer wish to receive such notifications by following the unsubscribe link located at the bottom of each such e-mail or by sending a request to [info@zaton.hr](mailto:info@zaton.hr).

Collected data are retained depending on the conditions of the prize game/contest, and you will be additionally informed of this in the rules themselves.

## 7. DIRECT MARKETING

In some cases, based on legitimate interest, we may send you information by e-mail about our services that might be of interest to you, as well as various related offers and promotions. This is connected to your previous use of certain services.

At any time, you may let us know that you no longer wish to receive such notifications by following the unsubscribe link located at the bottom of each such e-mail or by sending a request to [info@zaton.hr](mailto:info@zaton.hr).

## 8. RESPONDING TO INQUIRIES (E-MAIL OR CALL CENTER)

When you contact us via our contact details by e-mail or by calling our call center, or submit an inquiry in another way, request our assistance, or ask a question to exercise any of your rights, we collect the data you provide, such as your first and last name, e-mail address, mobile phone number, and other data necessary for us to respond to your inquiry/request.

Depending on the nature of the contact, the legal basis for data processing may be your consent (so-called presumed consent for individuals who send an inquiry or voluntarily provide personal data), the performance of a contract (e.g., for inquiries related to the fulfillment of accommodation services), or legitimate interest (e.g., for call recording).

When your conversation with our call center is recorded, we will always notify you of this at the time of the call, i.e., before the conversation begins. We record calls for the purpose of protecting guests and other users of Turisthotel services from inappropriate communication by call center staff, for evidence in case of potential complaints or misunderstandings regarding contracted services based on guest and user calls, and for employee training and improvement of service quality. Call center recordings will be stored for 2 years from the date of recording.

## 9. VEHICLE ENTRY INTO THE RESORT

If you use our accommodation services and arrive with your own vehicle, during check-in we will request your vehicle registration details to enable smooth access through the resort ramps during your stay.

The mentioned LPR (License Plate Recognition) system recognizes vehicle registration plates, logs them in a tabular format, and links them with your first and last name when this information is entered into the system. This system is used to track vehicle entries and exits within the resort, and we process this data based on our legitimate interest for the added security of guests' vehicles, availability of parking spaces, and faster vehicle flow. The LPR system is reset at the end of each year, and accordingly, your data will be stored for a maximum of 1 year, depending on the specific time of arrival and departure from the accommodation.

To protect your personal data, we apply appropriate technical and organizational security measures in accordance with applicable privacy and data protection regulations. Only specially authorized personnel appointed by the data controller have access to your personal data.

We will only share your personal data with other recipients not previously mentioned based on a legal obligation or a justified request from an authorized body. If necessary, personal data may also be shared with trusted partners (data processors) for purposes such as customer support, IT system maintenance, video surveillance, etc., under mandatory confidentiality and data protection measures.

**Your rights are as follows:** the right of access, the right to rectification, the right to erasure, the right to restriction of processing, the right to object, and the right to data portability. If you believe your rights are not being respected, you have the right to lodge a complaint with the Croatian Personal Data Protection Agency.

If you want to learn more about your rights and the protection of your data, you may contact our Data Protection Officer via e-mail at [dpo@turisthotel.com.hr](mailto:dpo@turisthotel.com.hr) or by mail at Dražnikova ulica 78, Zaton, 23232 Nin, Croatia.

You may also exercise your rights using the **Data Subject Rights Request Form**, which can be found attached to this notice, at the reception, or on our website. Completed forms should be submitted using the contact details provided. Please note that you are not required to use this form; you may submit your request through any other method previously indicated.

# REQUEST FORM FOR EXERCISING THE RIGHTS OF THE DATA SUBJECT

## INFORMATION ABOUT THE PERSON (RESPONDENT) WHO WANT TO EXERCISE RIGHTS RELATING TO THE PROTECTION OF PERSONAL DATA<sup>1</sup>

Name and Surname \_\_\_\_\_

Personal Identification Number \_\_\_\_\_

Residential Address \_\_\_\_\_

## TYPE OF PERSONAL DATA PROTECTION RIGHTS THAT YOU WANT TO EXERCISE (please indicate the number)

1. Right to Erasure ("Right to be Forgotten")
2. Right of Access
3. Right to Rectification
4. Right to Restriction of Processing
5. Right to Data Portability
6. Right to Object
7. Rights Related to Automated Decision-Making and Profiling
8. Right to Withdraw Consent

## NOTE AND DESCRIPTION OF REQUEST

Date \_\_\_\_\_

Signature of Data Subject \_\_\_\_\_

## INFORMATION ON RECEIPT OF REQUESTS

Request received on (date) \_\_\_\_\_

Name, surname, and signature  
of employee \_\_\_\_\_

Competent organizational unit \_\_\_\_\_

The data collected in this form will be used by Turisthotel d.o.o. for exercising the rights of the data subject in accordance with the General Data Protection Regulation (EU 2016/679) and for responding to inquiries and objections of the data subject. Providing these data is mandatory, and in the case of refusal, Turisthotel d.o.o. will not be able to respond to the data subject's request. These data will be stored for a period of 5 years. All other information that Turisthotel d.o.o. is obliged to provide to the data subject in accordance with the aforementioned Regulation is contained in the Privacy Policy, which is published on the website.