

## PRIVACY POLICY

### **Our Mission**

At NissiBlu Hotel, we are dedicated to protecting your privacy and safeguarding your personally identifiable information. NissiBlu Hotel mission is to consistently exceed our guests' expectations in terms of the products and services we provide to our business and leisure travellers. We strive to create an experience that is responsive to our guests' needs by using the information you entrust us with responsibly. NissiBlu Hotel is committed to respecting your privacy and adhering to the principles of applicable data protection and privacy laws throughout the world.

We have provided this Privacy Statement as an explanation of the information we collect, how we use it, and how the use of this information can benefit your experience on our web sites and during your relationship with us. We wish to help you make informed decisions, so please take a moment to read the sections below.

### **1. INTRODUCTION**

This Website Privacy Policy (hereinafter the “Policy”) applies to NissiBlu Hotel. NissiBlu Hotel is dedicated to protecting your privacy and safeguarding your personally identifiable information (hereinafter “Personal Data”). NissiBlu Hotel mission is to consistently exceed our guests' expectations in terms of the products and services we provide to our business and leisure travellers. We strive to create an experience that is responsive to our guests' needs by using the Personal Data you entrust us with responsibly. NissiBlu Hotel is committed to respecting your privacy and adhering to the principles of applicable data protection and privacy laws. Furthermore, NissiBlu Hotel is dedicated to protecting the Personal Data collected when you visit our website and when you use it for our services including our booking and registration services. This Policy pertains to NissiBlu Hotel website and sets out how NissiBlu Hotel commitment to protecting Personal Data is implemented in the collection, use, transfer and retention of Personal Data. By agreeing to this Policy and/or by using any of our products or services (e.g. in the context of registering for any of our products or services), you understand and acknowledge that we will collect and use your Personal Data as described in this Policy.

### **2. PERSONAL DATA COLLECTION**

NissiBlu Hotel collects Personal Data about our guests and visitors to our website so that we can provide an experience that is responsive to our guests' and visitors' anticipated needs. Personal Data may be collected as part of:

- fulfilling reservation or information requests
- registering for program membership
- subscribing to Newsletter
- submitting a job application
- responding to communications from us (e.g., surveys, promotional offers, or reservation confirmations)

**Reservations:** The types of Personal Data that we collect from you in the course of your reservation may include your full name, home, professional and e-mail addresses, telephone and fax numbers, date of birth, gender, lifestyle information such as room preferences, leisure activities, and other information necessary to fulfil special occasions and special

requests (e.g. health conditions that require special room accommodations, religious and dietary requests).

In the course of your reservation, you provide Personal Data to NissiBlu Hotel such as full names and dates of birth about other individuals such as your companions. By providing such information, you represent and warrant to us that you have obtained such individuals' permission to so do and that such individuals are aware of, understand and accept this, Policy.

We do not generally collect "special categories of personal data" i.e., personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, genetic data, biometric data, unless it is volunteered by you or unless we are required to do so pursuant to applicable laws or regulations. We may use health data provided by you to serve you better and meet your particular needs and special requests.

NissiBlu Hotel may also collect non-personally identifiable information about you, such as your use of our websites, communication preferences, travel habits, aggregated data relative to your stays, and responses to promotional offers and surveys.

**Information requests:** In order to handle and respond to your inquiries and requests we might collect and store your full name, email, phone and any other information you might provide to us. This Personal Data is strictly used to adequately respond to your inquiries or requests and will not be disclosed to third parties, others than those mentioned in this Policy or where disclosure is required or permitted by law.

**Register to become a member:** The types of Personal Data that are collected while registering as member include full name, email, date of birth, country, city, address, postal code, phone, mobile phone. Via this form, web visitors have the opportunity to subscribe to our newsletter.

**Subscribe to Newsletter:** The types of Personal Data that are collected while subscribing to our newsletter include full name, email address and country.

**Submit a job application:** In case you decide to apply for NissiBlu Hotel career vacancies through website, you should read our Applicant Privacy Notice.

**Surveys:** We may request demographic data or other personal information in customer surveys.

**Social Media:** If you choose to participate in NissiBlu Hotel sponsored social media activities or offerings, we may collect certain information from your social media account consistent with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates and friend list. We may also allow you to enter into contests to provide photos, such as of your stay with us, which you may share with your connections on social media for votes, shared offers or other promotions.

### 3. THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We are committed to collecting and processing your Personal Data in accordance with applicable data protection laws.

NissiBlu Hotel does not process personal data unless it has identified a legal basis for the processing, i.e., provided that at least one of the following requirements are met:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- processing is necessary for compliance with a legal obligation to which the controller is subject.
- processing is necessary in order to protect the vital interests of the data subject or of another natural person.
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

### **Consent**

As part of our commitment to keep you informed, we may mail, e-mail, telephone, or contact you by other means to inform you about news, events, activities, new NissiBlu Hotel products and services, or upcoming NissiBlu Hotel special offers, events, enhancements, or other relevant information that may be of interest to you. You may also receive mailings or other communications from carefully selected third parties. We always offer you the option to decline any or all of these communications by contacting NissiBlu Hotel directly.

We would like to keep all of our guests and visitors informed and equally able to take advantage of the benefits offered by NissiBlu Hotel and its strategic marketing partners.

NissiBlu Hotel includes, in any case, provisions for:

- Determining what disclosures are made in order to obtain valid consent
- Ensuring the request for consent is presented in a manner which is clearly distinguishable from any other matters, is made in an intelligible and easily accessible form, and uses clear and plain language
- Ensuring the consent is freely given (i.e. is not based on a contract that is conditional to the processing of personal data that is unnecessary for the performance of that contract)
- Documenting the date, method and content of the disclosures made, as well as the validity, scope, and volition of the consents given
- Providing a simple method for a data subject to withdraw their consent at any time

If you would like to find out more about the legal basis on which we process personal information please contact us. If you have provided your consent to our processing of your information you can withdraw this consent at any time by contacting us at our Details section

### **4. DATA USE**

NissiBlu Hotel is fully committed to providing you with information about the collection and use of personal data furnished by, or collected from you while using our website, products and services. It is our practice not to ask you for information unless we need it or intend to use it. Some of the primary purposes for collecting your Personal Data are as follows:

- providing services such as processing a transaction (e.g., making a reservation, fulfilling a request for information, or completing a product order)
- marketing and communications with you in relation to the products and services offered by NissiBlu Hotel, our strategic marketing partners, and other trusted third parties

- performing market research via surveys to better serve your needs, improve the effectiveness of our website, our products and services, your hotel experience, our various types of communications, advertising campaigns, and/or promotional activities
- To comply with obligations imposed by laws or regulations

You will always be offered the choice not to submit your Personal Data or to decide what communications you want to receive from us. However, doing so may cause certain transactions to become affected. For example, not providing a name will prevent the processing of reservations.

## **5. TRANSFER OF PERSONAL DATA**

NissiBlu Hotel may disclose or share your Personal Data with affiliated companies, external service providers, third party vendors, tour operators, travel agents, and otherwise as necessary to perform transactions with you and providing our services and manage our business, and dealing with your inquiries or requests and to the extent that is necessary for the purposes for which your Personal Data was collected for according to this Policy. Such transfers will be protected by appropriate safeguards (e.g. appropriate contractual clauses, data processing contracts, intra-group disclosures of personal data, etc.). In addition, we may disclose or share Personal Data where such disclosure is necessary for compliance with a legal obligation to which we are subject.

As a general practice, NissiBlu Hotel does not sell, rent, or give physical possession of your Personal Data. Situations in which NissiBlu Hotel may share or disclose your information with others include:

- when we have received your consent to do so
- in situations where sharing or disclosing your information is required in order to offer you products or services you desire (e.g., a vacation package)
- when companies or services providers that perform business activities on behalf of NissiBlu Hotel require such information (e.g., credit card processing, customer support services, market research administration or database management services)
- to comply with legal or regulatory requirements or obligations in accordance with applicable law or court order
- in case of emergency such as to safeguard the life, health, or property of an individual

If information is shared as mentioned above, we seek to limit the scope of information that is furnished to the amount necessary for the performance of the specific function. Unless otherwise precluded by legal process, we require third parties to protect your Personal Data and abide by applicable privacy laws and regulations.

## **6. SECURITY SAFEGUARDS**

NissiBlu Hotel recognizes the importance of information security, and is constantly reviewing and enhancing our technical, physical, and logical security rules and procedures. NissiBlu Hotel website and servers have security measures in place to help protect your personally identifiable information against loss, misuse, and alteration while under our control.

Although "guaranteed security" does not exist either on or off the Internet, we safeguard your information using both procedural and technical safeguards, including password controls and "firewalls".

NissiBlu Hotel staff are to ensure that all policies are complied with and security measures are not circumvented.

## **7. ON-LINE TECHNOLOGIES - COOKIES POLICY**

NissiBlu Hotel may use cookies, invisible pixels, and web beacons to obtain information about you while visiting our websites. A cookie is a very small text file that is sent to your browser from a web server and stored on your computer's hard drive. It assigns the computer with a unique identifier, which in turn, becomes your identification card whenever you return to NissiBlu Hotel website.

Cookies are designed to save you time because they help us to provide you with a customized experience without you having to remind us of your preferences each time you return to our web pages. NissiBlu Hotel cookies are not designed to damage your files, nor can they read information from other files on your computer hard drive.

Cookies can also help us provide you with a personalized on-line experience in the following ways:

- they remember your user name and password for future visits so log-in is easier and faster
- they ensure you are provided with the appropriate frames and content
- they ensure you obtain all requested information
- they help us deliver communications that are relevant and responsive to your interests and location

NissiBlu Hotel cookies are limited to our websites only, and are not designed to follow you when browsing the Internet after leaving NissiBlu Hotel owned website. We track the usage of our website in order to better meet your needs and to help make it easier for you to find information in the future. Please note that in addition to NissiBlu Hotel cookies, various third parties may also place cookies on your computer's hard drive. NissiBlu Hotel is not responsible for the presence or absence of third-party cookies, or for the technological capabilities or practices employed by third parties in connection with third party cookies.

If you would prefer not to have the benefits of cookies, your Internet browser can be adjusted to treat cookies in different ways. Depending upon the type of browser you are using, you may be able to configure your browser so that:

- you are prompted to accept or reject cookies on an individual basis or
- you may be able to prevent your browser from accepting any cookies at all

You should refer to the supplier or manufacturer of your web browser for specific details about cookie security. However, you should also understand that rejecting cookies might affect your ability to perform certain transactions on our websites and our ability to recognize your browser from one visit to the next.

All modern browsers allow you to change your cookie settings. You can usually find these settings in the Options or Preferences menu of your browser. To understand these settings, the following links may be helpful, or you can use the Help option in your browser for more details.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to store your preferences.

It is usually possible to stop your browser accepting cookies, or to stop it accepting cookies from a particular website. However, these options may cause malfunctions to some services provided by various websites, if not used properly

NissiBlu Hotel also uses invisible pixels, sometimes called web beacons, to count how many people visit certain web pages. Information collected from invisible pixels is used and reported in the aggregate and does not contain personally identifiable information.

NissiBlu Hotel may use this information to improve marketing programs and content.

## **8. CHILDREN**

Our website is not intended for children, and we do not intentionally solicit or collect personal data from individuals under the age of 18. If we are notified or otherwise discover that a minor's personal information has been improperly collected, we will take all commercially reasonable steps to delete that information. In limited instances, we may have a campaign or programme targeted towards children. In these instances, details on the information practices will be presented within the terms and conditions of the programme or campaign.

## **9. PERSONAL DATA RETENTION AND DELETION**

NissiBlu Hotel is committed not to retain personal data for a longer period than is necessary regarding the reasons that the personal data was obtained and we will make sure we will delete it securely.

## **10. RIGHTS OF DATA SUBJECTS**

In this section NissiBlu Hotel addresses the rights deriving from Regulation (EU) 2016/679 and how these rights can be exercised by the data subjects. For any further clarifications please contact NissiBlu directly.

### **10.1 Individual's Right of Access or Rectification**

NissiBlu Hotel assumes that Personal Data collected directly from the individual will be accurate and complete. Individuals can access and update their own Personal Data using the Processing Restriction Request Form.

### **10.2 Individual's Right to Erasure**

The data subject may request that any information held about it be deleted or removed, and, in such case, any third parties who process or use that data must also comply with such request. An erasure request can only be refused if an exemption applies. The Right to Erasure can be exercised using the Data Subject Erasure Request form.

NissiBlu Hotel is obligated to erase personal data where one of the following applies:

- personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed
- the data subject withdraws consent and no other legal basis for processing exists
- the data subject objects to the processing carried out on the grounds of the Data Controller's legitimate interests and there are no other overriding legitimate grounds for the processing
- the personal data has been unlawfully processed

If the request to erase Personal Data has been received from a data subject, the identity of the data subject has been confirmed, the request meets one of the above requirements and there is no opposing legal reason for processing, NissiBlu Hotel must delete the relevant data in their entirety.

If NissiBlu Hotel cannot actually delete personal data, NissiBlu Hotel will ensure that it:

- is not able, or will not attempt, to use the personal data to inform any decision in respect of any individual or in a manner that affects the individual in any way
- does not give any other organization access to the personal data
- protects the personal data with appropriate technical and organizational security
- commits to permanent deletion of the information if, or when, this becomes possible

### **10.3 Individual's Right to Restrict Processing**

The data subject has the right to restrict the controller from processing using the Data Subject Processing Objection Form.

### **10.4 Individual's Right to Object**

Individuals have the right to object at any time to processing of their personal data using the Data Subject Processing Objection Form.

### **10.5 Individual's Right to Data Portability**

Upon request and provided that the relevant requirements stipulated in Article 20 of GDPR are met, a data subject should have the right to receive a copy of their Personal Data in a structured format using the Data Subject Request Form.

These requests are to be processed within one month, provided there is no undue burden and it does not compromise the privacy of other individuals. A data subject may also request that their data be transferred directly to another system. This must be done for free.

If NissiBlu Hotel cannot respond fully to the request within 30 days, the DPO shall nevertheless provide the following information to the Data Subject, or its authorized legal representative within the specified time:

- An acknowledgement of receipt of the request
- Any information located to date
- Details of any requested information or modifications which will not be provided to the Data Subject, the reason(s) for the refusal, and any procedures available for appealing the decision
- An estimated date by which any remaining responses will be provided
- An estimate of any costs to be paid by the Data Subject (e.g., where the request is excessive in nature)
- The name and contact information of the contact person.

## **11. LINKS TO OTHER WEBSITES**

In order to anticipate your needs, NissiBlu Hotel provides links to other websites for your convenience and information. NissiBlu Hotel is not responsible or liable for any content presented by or contained in any independent website, including, but not limited to, any advertising claims or marketing practices. Please note that while NissiBlu Hotel will protect your information on NissiBlu Hotel website, we cannot control and will not be responsible for the privacy policies of third-party websites. Third-party websites that are accessed through links on our websites have separate privacy and data collection practices, and security measures. We have no responsibility or liability for the practices, policies and

security measures implemented by third parties on their websites. We encourage you to contact the administrators of such websites to ask questions about their privacy practices, policies and security measures before disclosing any personally identifiable information. We recommend that you review the privacy statements and policies of linked websites to understand how those websites collect, use and store information.

## **12. AMENDMENTS**

Should NissiBlu Hotel elect to change this Privacy Policy, in order to meet changes in the regulatory environment, business needs or to satisfy the needs of our guests, properties, strategic marketing partners, and service providers, we will post the changes here. Updated versions will be posted on our website and date stamped so that you are always aware of when the Privacy Policy was last updated. Where the changes are significant, we may also choose to email concerned users with the new details. Where required by law, we shall endeavour to obtain your consent to make these changes.

## **13. OUR DETAILS**

In case you would like to update your information, modify your communication preferences, or if you do not want to receive marketing communications from NissiBlu Hotel in the future, you can contact us:

- by e-mail: [info@nissiblu.com](mailto:info@nissiblu.com)
- by telephone: 23200500
- by fax: 232005001