

## Privacy Policy

This Privacy Policy (hereinafter “**Policy**”) governs the terms and conditions under which CatchHotels.com s.r.o., Company ID: 178 70 771, with its registered office at Benediktská 691/5, Old Town, 110 00 Prague 1, incorporated in the Commercial Register maintained by Municipal Court in Prague, under File No. C 378119 (hereinafter “**CatchHotels**”, “**we**”, “**us**”, “**our**”), processes personal data in connection with:

- Visiting our websites, using our services concerning the operation of the website [www.databazevseho.cz](http://www.databazevseho.cz) and other websites or visiting our branded social media profiles run and managed by CatchHotels and linked to this Policy (hereinafter the “**Websites**”);
- Receiving communication from CatchHotels, including but not limited to emails, phone calls, texts.

We are serious about protecting your personal data and want you to feel safe and comfortable while browsing our Websites. We therefore respect the confidentiality of your personal data and always proceed in accordance with the provisions of data protection legislation, in particular, Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation, hereinafter “**GDPR**”), and follow this Policy.

With respect to the above, CatchHotels uses this Policy to inform you about how, for what purposes and to what extent CatchHotels uses your personal data and what information about you as a user of the Websites CatchHotels may process.

### 1. Definitions

“**Personal data**” means any information relating to a data subject;

“**Controller**” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

“**Data subject**” means any identified or identifiable person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

“**Data processor**” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

“**Processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 2. Basic information about personal data processing by CatchHotels

We always process your personal data lawfully, fairly and in a transparent manner and for specified, explicit and legitimate purposes. We process personal data only to the minimum necessary extent and we keep them in a form which permits your identification for no longer than is necessary in respect of the purpose of the processing.

We process your personal data in a manner that sufficiently ensures their integrity and confidentiality, i.e. by appropriate technical or organisational measures and appropriate protection against unauthorised or unlawful processing and against loss, destruction or damage. We take care to ensure that personal data that are inaccurate, having regard to the purpose for which we process them, are erased or rectified without delay.

We respect the principle of refraining from personal data processing and the principle of data minimisation. We therefore only retain your personal data if it is necessary in order to achieve the purpose of the processing or for various retention periods specified by law. The relevant data are erased in accordance with the law if the relevant purpose ceases to exist as a result of the withdrawal of your consent and/or upon the expiration of the lawful retention period.

For the above reasons, we use computer security such as a firewall and data encryption to operate our Websites. We have implemented adequate physical, electronic and procedural safeguards and use reliable IT service providers. However, given the nature of the internet, we would like to bring to your attention the fact that certain security gaps may exist in the transmission of personal data via the internet (e.g. in communication via e-mail) and that full protection of personal data preventing third party access is impossible.

### **3. Legal ground, purpose and extent of the processing of your personal data**

We may process your personal data on the following legal grounds and for the following purposes:

**a. Personal data processing necessary for the CatchHotels' compliance with a legal obligation according to Article 6(1)(c) of GDPR.**

We process your Personal data (which might include usage data) when cooperating with public and government authorities, courts or regulators in accordance with our legal obligations under applicable laws to the extent this requires the processing or disclosure of Personal Data to protect our rights or comply with data subject requests. The personal information we collect may include the following: name(s), email address, title, phone numbers, information you provide when requesting to use our services.

**b. Personal data processing necessary for the performance of the contract according to Article 6(1)b of GDPR**

**i. We provide our services via**

- The contract form you submit
- The email you send us

We process your Personal data to perform our contract with you for the provision of our services and to satisfy our obligations under the applicable terms of use if you request the services via the Add-Ins functionalities, by submitting a request via contact form or by sending it via email. The personal information we collect may include the following: name(s), email address, title, phone numbers, information you provide when requesting to use our services (e.g. date of arrival, date of departure, name of the hotel, price, etc.). Please see below under Article 4 a.

**c. Personal data processing necessary for the legitimate interests of CatchHotels according to Article 6(1)(f) of GDPR.**

**i. Provision and improvement of and support for our Websites**

In order to enable you view and use our Websites, we process various information about your online activity, e.g. the use of our Websites, the time of accessing our Websites, the time spent on our websites etc. with a view to promote security of our Websites, technical support for our Websites and to improve and monitor their functionalities.

We process your Personal data to develop, optimize, and improve the performance of the services.

**ii. Contact forms**

If you use the contact forms on our Websites for your queries to CatchHotels, we use the Personal data provided by you to the extent of the name, the e-mail address, phone number and any additional data to resolve the query made by you.

**iii. Newsletter**

If you are our customer and unless you express your disagreement to our newsletter, CatchHotels processes your e-mail address with a view to send you the news in a newsletter.

**d. Personal data processing on the basis of your consent to the processing of your personal data according to Article 6(1)(a) of GDPR**

**i. Cookies and other tracking technologies and web analytics tools**

We use various cookie files, which may contain your personal data (e.g. your IP address or the configuration of your browser and computer). CatchHotels uses cookies, tracking technologies and/or web analytics tools (hereinafter “**cookies**”) on the basis of your consent that you express by accepting the cookies settings displayed to you when you visit our Websites, which are subsequently available at [●]/by the settings of your web browser.

You can withdraw your consent to the saving of cookies by selecting the appropriate settings in your web browser/in the above-mentioned cookies settings. Please be advised that if you withdraw your consent to the use of cookies you will not be able to use fully all the functionalities of our online services.

**ii. Newsletter**

If you are not our customer and if you give your consent to being sent our newsletter by subscribing to it on our Websites, CatchHotels processes your e-mail address with a view to sending you the news in a newsletter.

**4. What sources do we collect your personal data from?**

We collect your Personal data from multiple sources:

**a. Personal data collected from you as the data subject**

We primarily collect the personal data about you that you provide voluntarily yourself in the accommodation reservation that you share with us in order to use our services or that are processed automatically by the Browser Add-Ins you download. Such data can include name, surname, email address, payment method, accommodation type and location, reservation date and price, number of guests etc. Further, we process the data that we acquire in connection with your queries, comments, requests, etc.

**b. Cookies and other tracking technologies**

Your Personal data also come from cookies, which are small text files that are created by the web server and saved into your computer through your browser. We use cookies in connection with your activity on our Websites and with other online activities. Cookies help us make our online services more user friendly, efficient and secure, and may also be used to implement certain user features.

**c. Web analytics tools**

Our Websites also use online web analytics services and social plugins for the purposes of continuously optimising the user interface, to better understand our users’ needs and to optimize our services and user experience and to maximise its user friendliness. These automatically collected data are not tied to data from other sources. However, we reserve the right to back-check these data if we are notified of a specific risk of their misuse.

**d. Log files**

CatchHotels and the providers hosting our Websites use their databases to log data about each access to the server where the online presentation of our Websites is located. Hence whenever you visit our Websites, your web browser automatically sends certain information to the Websites server to enable communication between your browser and the server. This information is then saved in the so-called log files.

The log files mainly contain information about:

- i. the type and version of the browser you are using;
- ii. the type and version of your operating system;
- iii. the website you have come to our Websites from;

- iv. the website you leave our Websites for;
- v. the IP address of your computer;
- vi. the date, time and success of finding our Websites;
- vii. when you accessed the Websites and how long you stayed on the Websites;
- viii. the volume of data transmitted between the server and your computer;
- ix. the number of visits and average time spent on our website.

For security reasons, the data in the log files are kept for only as long as the purpose of the processing lasts. If the given purpose of retaining the log files no longer exists, the log files are deleted immediately. The data whose further retention is necessary on the grounds of providing evidence will not be deleted until the relevant case is closed.

**e. Google Analytics**

CatchHotels uses the Google Analytics plugin from Google Inc., 1600 Amphitheatre Parkway Mountain View, California 94043, USA (hereinafter “**Google**”). The Google Analytics plugin analyses your use of our Websites and other online activities. The Google Analytics plugin connects the data generated by Google Analytics with the cookies of CatchHotels.

You can prevent the collection of the data generated by the cookies files and their use by Google Analytics by not providing your consent to such Personal data processing in our cookies banner and further by downloading and installing the plugin available at <https://tools.google.com/dlpage/gaoptout?hl=cs>). For detailed information about the terms and conditions and the privacy policy please see [www.google.com/analytics/terms/gb.html](http://www.google.com/analytics/terms/gb.html) or <https://policies.google.com/privacy>.

**f. Google Ads**

CatchHotels also uses Google Ads from Google, which helps us determine how effective the clicks on our ads with regard to the desired customer behaviour – e.g. requests, Add-Ins downloads, newsletter subscriptions, etc. You can prevent the collection of the data generated by the cookies files and their use by Google Ads by not providing your consent to such Personal data processing in our cookies banner. For detailed information about the terms and conditions and the privacy policy please see <https://support.google.com/google-ads/>.

**g. Facebook Pixel**

Facebook Pixel from Facebook Inc., with its registered office at 1 Hacker Way, Menlo Park, California 94025, USA (hereinafter “**Facebook**”) is used by CatchHotels to generate reports about your online activity on our Websites (e.g. whether you visited our Websites after viewing an ad on Facebook or whether certain action, was performed following your visit to our Websites).

You give your consent to using the Facebook Pixel cookie with your choice of cookies settings in our cookies banner. If you deny your consent, the Facebook Pixel cookies are not used. Please note that the Facebook Pixel cookies from our Websites may also be used by third parties, including Facebook, to collect or obtain acquire information or to provide advertising metric and targeting services. For more information, please visit <https://www.facebook.com/legal/terms/business tools>.

If you are interested in the specific source of the processing of your Personal data, you may use the contact details provided below to submit your query to us.

If you provide us with any Personal data relating to other individuals, you represent that you have the authority to do so, and where required, have obtained the necessary consent, and acknowledge that it may be used in accordance with this Privacy Policy.

**5. Recipients of your personal data**

Subject to the applicable legislation and/or your consent, where so required, CatchHotels transmits your personal data to third parties (recipients) for the purpose of further processing, which parties process the personal data under a data processing agreement.

In particular, the above-mentioned recipients of the personal data include the following categories of recipients:

- companies belonging to the company group to which our Company belongs;
- administrators of our Website;
- external legal counsel;
- social network operators;
- marketing software providers;
- law enforcement authorities, courts, administrative authorities where CatchHotels as the Controller is so obliged by the legislation.

## **6. Personal data processing period**

We process Personal data only for as long as the Personal data are necessary for the achievement of the purpose of their processing. As soon as the purpose of the processing is achieved and there are no other purposes for which we would be authorised to process the Personal data, we erase the Personal data. For example, after your reservation has been made and/or after the time for which the reservation was made has expired, your email address (and Personal data that may result from such an address) is deleted.

As regards Personal data processed on the basis of your consent, we also erase your Personal data if you withdraw your consent to the processing of your Personal data.

If we process the Personal data on the basis of legitimate interest and you object to their processing and unless there are any prevailing legitimate grounds for the processing, your Personal data will also be erased after we inform you about this fact. However, if there is any Personal data that we are unable, for technical reasons, to delete entirely from our systems because residual copies of your Personal data may not be removed from our backup systems for a limited period of time, we will implement appropriate measures to prevent any further use of such Personal data and protect Personal data from accidental or malicious loss and destruction.

## **7. Transfer of data to third countries**

Your Personal data may be transferred to non EU/non EAA member states and, therefore, processed outside your country or jurisdiction, including in places that are not subject to an adequacy decision by the European Commission or your local legislation or regulator, and that may not provide for the same level of data protection as is standard under the GDPR. We ensure that the recipient of your Personal data offers an adequate level of protection and security, for instance by entering into the appropriate back-to-back data processing agreements and, if required, standard contractual clauses (SCCs) or an alternative mechanism for the Personal data transfer of data as approved by the European Commission (Art. 46 GDPR) or other applicable regulators or legislators.

As part of using cookies in cases in which you granted your previous consent to do so, we transfer some of your personal data to the United States. Some of the third parties may be committed to upholding the principles of the “EU-US Data Protection Framework” administered by the US Department of Commerce. The DPF ensures an adequate level protection for Personal data according to Commission Implementing Decision (EU) 2023/4745 of 10 July 2023.

## **8. Your rights as a data subject**

As a data subject you have the following rights:

- i. Right to be informed
- ii. Right of access to Personal data
- iii. Right to rectification
- iv. Right to erasure (‘right to be forgotten’)
- v. Right to restriction of processing
- vi. Right to data portability

- vii. Right to object
- viii. Right not to be subject to a decision based solely on automated processing, including profiling
- ix. The right to lodge a complaint with the Office for Personal Data Protection or other relevant supervisory authority in connection with the processing of personal data

Except for the right to lodge a complaint with the Office for Personal Data Protection or other relevant supervisory authority in connection with the processing of Personal data, you may exercise all the rights listed above by making a request using any manner specified below. We will inform you about the action taken on your request within one month of receipt of your request and no later than within three months of receipt of your request if that period has been extended on reasoned grounds.

**a. Right to be informed**

We will always use this Policy and other notice, if required, to inform you in a concise, transparent, intelligible and easily accessible manner about the processing of your Personal data from the moment we obtain Personal data from you. If we do not obtain personal data from you directly, we will provide you the information within a reasonable period after obtaining them, but within one month at the latest, unless the provision of such information proves impossible or would involve a disproportionate effort (e.g., we have no contact information about you).

**b. Right of access to Personal data**

You have the right to obtain from us confirmation as to whether or not Personal data concerning you are being processed. If we process your Personal data, we will provide you with the information that you request or that we are required to provide by the law.

If we do process Personal data about you, we will provide you with a copy of the Personal data which are subject to the processing free of charge. For any further copies requested by the data subject, we may charge a reasonable fee based on the administrative costs of making such copies. The right to obtain a copy of the Personal data undergoing processing shall not adversely affect the rights and freedoms of others.

Where you make the request by electronic means, the information will be provided in a commonly used electronic form, unless otherwise requested by you.

**c. Right to rectification**

You have the right to the rectification of any inaccurate Personal data concerning you and, taking into account the purposes of the processing, to have incomplete Personal data completed, including by means of providing a supplementary statement. We communicate any rectification of Personal data to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We will inform about those recipients if you request it.

**d. Right to erasure / right to be forgotten**

We will erase your Personal data without undue delay where one of the following grounds applies:

- i. your Personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- ii. you withdraw the consent on which the processing is based and there is no other legal ground for their processing;
- iii. you object to the processing of your Personal data and there are no overriding legitimate grounds for the processing or you object to the processing of your Personal data for the purposes of direct marketing;
- iv. your Personal data have been unlawfully processed;
- v. your Personal data have to be erased to comply with a legal obligation under European Union or Member State law to which CatchHotels is subjected;

- vi. your Personal data have been collected in relation to the offer of information society services to a child.

The above does not apply to the extent that the processing of the Personal data is necessary:

- i. for exercising the right of freedom of expression and information;
- ii. for compliance with a legal obligation imposed by European Union or Member State law which requires processing and to which CatchHotels is subject to or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- iii. for reasons of public interest in the area of public health;
- iv. for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the exercise of the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing;
- v. for the establishment, exercise or defence of legal claims.

We communicate any erasure of Personal data to each recipient to whom the Personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We will inform you about the recipients of the Personal data which have been notified if you request it.

If we refuse to erase your Personal data based on the exemptions specified above, we will inform you thereof within one month of receipt of the request, reason the grounds for the application of the exemptions, and instruct you in accordance with the requirements of the applicable laws and regulations.

#### **e. Right to restriction of processing**

You have the right to restrict your Personal data processing in the following cases:

- i. the accuracy of the Personal data is contested by you; in this case, the processing is restricted for a period enabling us to verify the accuracy of the Personal data;
- ii. the processing is unlawful and you oppose the erasure of the Personal data and request the restriction of their use instead;
- iii. we no longer need the Personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- iv. you have exercised your right to object the processing of the Personal data; in this case, the processing is restricted until we determine whether our legitimate grounds override your legitimate interests.

As a result of restricted processing of Personal data, we may continue to store the relevant Personal data but they may only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State. In such cases you will be informed before the restriction of processing is lifted.

#### **f. Right to data portability**

You have the right to receive your Personal data processed by us provided that one of the following conditions is met:

- i. the Personal data are processed for a specific purpose on the basis of your consent;
- ii. the Personal data is processed by automated means;
- iii. if the Personal data are from a special category processed for one or more specified purposes on the basis of your explicit consent; or
- iv. the processing of the Personal data is necessary for the performance of a contract to which you are a party or in order to execute precautions accepted at your request prior to entering into a contract.

The Personal data provided to us is deemed to include data which you have disclosed to us directly, intentionally and actively, e.g. by means of sharing your booking details, submitting a

contact form, sending an email, as well as Personal data generated on the basis of your activity on our Website, e.g. the location data, application login dates, etc.

We will provide the data in a structured, commonly used and machine-readable format. You may transmit the Personal data obtained by us to another data controller. In your request, you may choose whether we should provide the Personal data to you or whether you will exercise your right to have your Personal data transmitted directly from us to another controller/processor, where technically feasible.

**g. Right to object**

As regards the processing of Personal data under the legal ground of legitimate interest of ours, you may object to the processing of your Personal data on grounds relating to your particular situation described in the objection. You may object by using the contact details provided below.

After we receive your objection we will cease the processing of (but will still keep) your Personal data to assess whether we have compelling legitimate grounds for their processing which override your interests, rights and freedoms, or whether we need your Personal data for the establishment, exercise or defence of our legal claims. If we conclude that we do have such grounds, we will inform you accordingly, including advising you on your options for further defence, and we will continue to process such Personal data. On the contrary, if we conclude that we do not have sufficient grounds for the processing of the Personal data, we shall inform you accordingly and erase such Personal data.

You have the right to object at any time to the processing of Personal data for direct marketing purposes.

**h. Right not to be subject to a decision based solely on automated processing, including profiling**

We process your Personal data with respect for your right not to be subject to a decision based solely on automated processing which significantly affects you, including profiling (i.e. any form of automated processing of Personal data consisting of the use of Personal data to analyse, predict or evaluate certain aspects concerning you – e.g. your economic situation, interests, etc.).

However, in controlling your Personal data, we may make you a subject of an automated decision if such a decision is necessary for entering into, or conclusion of, a contract between you and us, or is authorised by European Union or Czech law which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or is based on your explicit consent.

**i. Right to file a complaint**

If you disagree with the way we have handled your request, you may file a complaint with the Office for Personal Data Protection:

- i. by electronic means at [posta@uouu.cz](mailto:posta@uouu.cz);
  - ii. by using electronic data mailbox ID: qkbaa2n;
  - iii. by phone at +420 234 665 111; or
  - iv. in writing to Pplk. Sochora 27, 170 00, Prague 7, Czech Republic,
- or with another competent supervisory authority of a Member State.

**9. Exercising your rights and obtaining more information about the processing of your personal data**

In order to exercise your rights specified above or make any queries regarding this Policy or the processing of your personal data, please use the following contact details:

*Postal address:* CatchHotels.com s.r.o., Koží 915/7, 11000 Prague, Czech Republic

*E-mail:* [privacy@catchhotels.com](mailto:privacy@catchhotels.com)



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