

PRIVACY POLICY

Imperial Riviera d.d.

May, 2022.

Imperial Riviera d.d., with its headquarters in Rab, Jurja Barakovića 2, OIB: 90896496260 (hereinafter: IMPERIAL RIVIERA or we or our), respects the privacy of every person it collects data from. We would like to inform you about what personal data IMPERIAL RIVIERA collects as the processing manager, for what purpose, how we protect the data and what your rights are.

CONTENT

PROCESSING MANAGER AND LEGAL FRAMEWORK	3
SCOPE OF APPLICATION	3
DATA PROTECTION OFFICIAL	3
PERSONAL DATA PROTECTION PRINCIPLES	3
LEGALITY OF PERSONAL DATA PROCESSING	4
TYPES OF PERSONAL DATA PROCESSED	5
DATA DELIVERY TO THIRD ENTITIES	6
DATA STORAGE RETENTION	8
RIGHTS OF THE DATA SUBJECTS	8
PROTECTION OF PERSONAL DATA OF CHILDREN	10
PERSONAL DATA SOURCES	10
TECHNICAL AND INTEGRATED DATA PROTECTION	10
TREATMENT OF PERSONAL DATA INFRINGEMENTS	10
SPECIFIC SECTION	11
STAY IN PROPERTIES (hotels, apartments, campings)	11
EXCHANGE OFFICE	13
EXCURSIONS, CONCERTS, TRANSFERS AND OTHER EXPERIENCES	13
CANDIDATES FOR EMPLOYMENT AND EMPLOYEES	14
Personnel Selection	16
Employment relation and other comparable relations	17
BUSINESS PARTNERS	17
Retention period	19
PUBLIC ANNOUNCEMENTS	19
VIDEO SURVEILLANCE	19
FINAL PROVISIONS	20

GENERAL SECTION

PROCESSING MANAGER AND LEGAL FRAMEWORK

As the processing manager, IMPERIAL RIVIERA, is committed to protecting your personal data. The collection and storage of data is carried out in accordance with the provisions of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter: Regulation), of the Law on the application of the General regulation of data protection (NN 42/2018) and other regulations governing the subject area, which are applied in the Republic of Croatia.

SCOPE OF APPLICATION

This Policy applies to any processing of personal data performed by IMPERIAL RIVIERA as the processing manager, unless another policy or other IMPERIAL RIVIERA document prescribes otherwise for a particular processing.

This Policy is divided into two parts: the General Section and the Specific section. The basic principles of personal data processing, contact details of personal data protection officials and other provisions specified in the General Section of this Policy are applied without exception to any personal data processing regardless of whether such processing is specifically processed in the Specific Section of this Policy or not. The Specific Section of the Policy deals, in more detail, with specific cases of data processing which represent the majority of all processing by IMPERIAL RIVIERA.

DATA PROTECTION OFFICIAL

IMPERIAL RIVIERA has appointed a personal data protection official who you can contact at any time via e-mail: gdpr@imperial.hr or by mail to the address Imperial Riviera d.d., Jurja Barakovića 2, 51280 Rab, Republic of Croatia - for DPO, issues related to personal data protection and for exercising their rights guaranteed by the General Data Protection Regulation.

All requests not related to personal data protection, which are delivered to the address of the data protection official, e.g. offers of job candidates, booking inquiries in IMPERIAL RIVIERA properties, etc. will be provided directly to the relevant departments within IMPERIAL RIVIERA, without special response to the sender by the data protection official.

PERSONAL DATA PROTECTION PRINCIPLES

IMPERIAL RIVIERA has recognized the principles of data processing as basic values that must be respected throughout the cycle of personal data processing, from their collection to their destruction or other cessation of processing. IMPERIAL RIVIERA processes data:

Lawfully - by processing data only if allowed by law and within the limits prescribed by law.

Fairly - by taking into account the specifics of each relationship, applying all appropriate measures to protect personal information and privacy in general and not impeding data subjects in exercising their rights.

Transparently - by informing data subjects about the processing of personal data. From the start of the data collection process, when data subjects are informed about all aspects of data processing, until its termination, data subjects are provided easy and fast access to their own data, which includes the possibility of accessing and obtaining a copy in accordance with the provisions of the Regulation. Certain information may be restricted only when required by law or when necessary for the protection of third parties.

Purpose limitation - by processing personal data for the purposes they were collected for and for other purposes only if the conditions of the Regulation are met. Data may be processed for matching purposes only taking into account (a) any link between the purposes of the collection of personal data and the purposes of the intended continuation of the processing; (b) the context in which the personal data was collected, in particular concerning the relationship between the data subjects and IMPERIAL RIVIERA; (c) the nature of the personal data, in particular whether special categories of personal data are processed in accordance with Article 9. Regulations or personal data relating to criminal convictions and criminal offenses in accordance with Article 10. Regulations; (d) the possible consequences of the intended continuation of processing for the data subjects; and (e) the existence of appropriate protection measures.

Storage limitation - by storing data in a form which permits identification of data subjects for no longer than is necessary for the initial purposes, and longer only if permitted by the Regulation.

Data minimization - by processing data if it is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. Particular attention is given to not collecting data for which there is no justifiable reason for processing.

Accuracy - by keeping data accurate and up-to-date, and erasing inaccurate data in the scope of possibility.

Integrity and Confidentiality - by using appropriate technical and organisational measures to ensure appropriate personal data protection, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. Relevant measures are applied taking into account the risk of each type of data processing.

LEGALITY OF PERSONAL DATA PROCESSING

In order to respect the lawfulness of processing personal data, IMPERIAL RIVIERA processes personal data only if and to the extent that at least one of the following is met:

Processing is necessary for the performance of the contract to which the data subject is a party or in order to take action at the request of the data subject prior to the conclusion of the contract; this is the most common purpose of data processing with an existing contractual relationship or a contractual relationship in negotiations as its basis.

Processing is necessary to comply with the legal obligations of the processing manager. As a legal entity, IMPERIAL RIVIERA has a number of obligations prescribed by various regulations. This obligation includes the collection and often the submission of data to public authorities. For example, the processing of personal data of shareholders who apply for the General Assembly, the processing of personal data of participants at meetings held at the premises of IMPERIAL RIVIERA in accordance with anti-pandemic measures and the like.

Processing is necessary for the legitimate interests of the processing manager or a third party, except where those interests are stronger than the interests or fundamental rights and freedoms of data subjects requiring the protection of personal data, taking into account reasonable expectations of data subjects based on their relationship with the processing manager, especially if the data subject is a child. In applying this legal basis, IMPERIAL RIVIERA assesses that the processing is appropriate to business needs, that it is the least invasive as possible and that the interests of the data subjects do not exceed the legitimate interests of IMPERIAL RIVIERA or a third party. Examples of such processing are

processing for administrative purposes, the purposes of maintaining computer network security, direct marketing, and improving our business. The data subject always has the right to object to such processing in these situations.

Processing is necessary to protect key interests of the data subject or other natural person. The right to personal data protection is not an absolute right and IMPERIAL RIVIERA equates it with other fundamental rights in accordance with the principle of proportionality. IMPERIAL RIVIERA acknowledges the possibility that in some situations it is necessary to process personal data in order to protect the key interests of the data subjects or other natural persons.

The data subject has consented to the processing of his or her personal data for one or more specific purposes. When processing personal data on the basis of consent, IMPERIAL RIVIERA provides that these are situations in which there are no, formal or informal, consequences for giving, refusing or denying consent. When processing is based on consent, the data subject may withdraw consent at any time without negative consequences. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

In certain exceptional situations, IMPERIAL RIVIERA may process data that would not be processed in regular situations, for example data collection based on the recommendations of the Croatian Institute of Public Health in case of epidemics, etc.

TYPES OF PERSONAL DATA PROCESSED

Specific categories of personal data: specific categories of personal data shall be processed only if the conditions set out in Article 9 of the Regulation are met. For example, IMPERIAL RIVIERA processes employee data that fall into specific categories of personal data, such as union membership data (for example, when exercising special rights under relevant regulations), religious or philosophical beliefs (for example, when exercising the right to additional non-working days for religious holidays, if the individual has voluntarily disclosed such data for the stated purpose), or health related data (for example according to special regulations on occupational safety or keeping records of workers or when special health certificates are required for certain jobs), etc.

Data on criminal convictions and criminal offenses: when there is a legal authority to do so, IMPERIAL RIVIERA also processes personal data relating to criminal convictions and offenses, such as certificates of impunity for workers.

Personal data that do not fall the previous two groups: such personal data make up the largest part of the processed data, and these are most often identification and contact data such as name and surname, OIB, data generated by movement in rooms under video surveillance.

Most of the personal data that IMPERIAL RIVIERA collects is provided by the data subjects themselves and we ask that you do not provide sensitive information (such as race or ethnic origin, political opinions, religious or philosophical beliefs, etc.) when this is not necessary. If you nevertheless provide sensitive information for any reason, you hereby give your express consent to the collection and use of such information in the ways described in these Policy or in the manner described at the time of disclosure of that information.

THE ROLE OF VALAMAR RIVIERA d.d.

IMPERIAL RIVIERA concluded with the company Valamar Riviera d.d. with its registered office in Poreč, Stancija Kaligari 1 OIB: 36201212847 (hereinafter: Valamar) Contract in relation to the management of hotel and tourist facilities and contents (hereinafter: Management contract) based to which Valamar manages certain business segments of IMPERIAL RIVIERA. In this sense, IMPERIAL RIVIERA and Valamar may act as separate managers or as joint managers of personal data processing, or Valamar may act as the executor of personal data processing of respondents.

Due to such entrepreneur agreement, when managing hotel and and tourist facilities and contents, Valamar sometimes directly manages certain activities, including the management of some of the activities described in the Special Part of this Privacy Policy, and in addition Valamar sometimes receives data from IMPERIAL RIVIERA and has a rights to view the data in certain activities where it subsequently comes to personal data processing. For example, Valamar manages the reservation function through the Valamar reservation center (call center) and via the websites www.valamar.com and www.camping-adriatic.com, and in these cases Valamar is an independent processing manager, however, all this information related to IMPERIAL RIVIERA facilities are also processed by IMPERIAL RIVIERA as an independent processing manager. Furthermore, Valamar has a legitimate interest in processing of personal data carried out for the purposes of direct marketing, primarily for the purpose of sending marketing messages (newsletters) by e-mail, SMS and / or instant messaging platform (Viber, Whatsapp, etc.). Based on a legitimate interest, Valamar may send different newsletters depending on the relationship that respondents have with Valamar or the facilities under Valamar's management. For this purpose, personal data is collected from guests and persons who have asked for an offer or booked accommodation, persons who have participated in the prize game, joined the loyalty program, filled out a satisfaction questionnaire, persons who have filled in the application at free Wi-Fi, a person who made a purchase in a web store or otherwise had a relationship with Valamar. Following the above, in certain cases IMPERIAL RIVIERE guests can receive from Valamar newsletters containing information about other hotels and facilities managed by Valamar, as well as accommodation quality questionnaires and other service e-mails. For IMPERIAL RIVIERA's guests, prize games can be organized from time to time, which can be organized by Valamar, in which case your personal data will be collected only if you decide to participate in the prize game. Valamar's Plus Club Loyalty Program is applied in the IMPERIAL RIVIERA. The conditions of membership are contained in Valamar's Rules of Loyalty Program, which can be found at www.valamar.com/hr/program-vjernosti/valamar-plus-club/pravilnik-programa. Also, based on the Management Agreement, Valamar has certain rights and obligations related to human resources, so in these cases Valamar has the right to process personal data of employees and candidates applying for employment in IMPERIAL RIVIERA, for example when sending applications through the website www.dobarposauvalamaru.com.

When Valamar acts as the processing manager, the Valamar Privacy Policy applies, which can be found at: <https://www.valamar.com/hr/izjava-o-privatnosti>.

DATA DELIVERY TO THIRD ENTITIES

IMPERIAL RIVIERA shares personal information with others only when permitted.

IMPERIAL RIVIERA is obliged by law to provide data to third parties. For example, delivering guest data via the eVisitor system, delivering employee data to the competent institutions to

the Croatian Pension Insurance Institute, to the Croatian Health Insurance Institute, the Tax Administration and the Central Register of Insured Persons and pension companies. Furthermore, in certain cases, IMPERIAL RIVIERA is obliged to submit or make available employment data to the Croatian Employment Service, for example to include workers in active employment policy measures, the competent police stations or the ministry responsible for internal affairs, for example in the case of senior government officials staying in IMPERIAL RIVIERA's properties, as well as for the issuance of work and residence permits, the ministry responsible for tourism in the case of employing scholarship holders, the ministry responsible for the economy and entrepreneurship when it comes to the use of investment subventions, insurance companies, banks and other cases required by law.

Also, certain employee data is sent to banks or pension funds as part of salary payments, and data can also be sent to creditors in accordance with enforcement regulations. Sometimes data is sent according to contractual obligations, for example with students in practice, data is exchanged with schools, colleges.

Certain personal data is also provided to business entities for the purpose of providing specific services such as the workers' health examinations (contracted occupational medicine), further, to institutions that organize legally mandatory training (occupational safety, hygiene, toxicology) or audit companies when conducting mandatory audits, public notaries when certifying, the Financial Agency for the purpose of obtaining business certificates, public procurement payers when IMPERIAL RIVIERA applies for public procurement tenders, further for the purposes of awarding and using official cards, official mobile devices or for the purchase of fuel.

It is possible to deliver data to business entities, processors, who process the data on behalf of IMPERIAL RIVIERA, which acts as the processing manager. Most often, these are IMPERIAL RIVIERA's business associates who provide IT services, who store them in their databases or have the possibility of accessing personal data until the end of processing. A detailed contract is concluded with such subjects regarding their powers and obligations in the processing of personal data, in accordance with the requirements of the Regulation.

In certain situations, it is possible for external entities and IMPERIAL RIVIERA to jointly determine the purposes and methods of personal data processing, in which case these external partners and IMPERIAL RIVIERA are joint processing managers. In these relations, the joint processing managers shall transparently determine their responsibilities for complying with the obligations under the Regulation, in particular with regard to the exercise of data subjects' rights and their duties to respect the transparency of processing, unless responsibilities are established by law.

A special case of data delivery to third parties is the fact that IMPERIAL RIVIERA has an entrepreneurial contract with Valamar and the data is submitted to Valamar, i.e. Valamar has access to personal data of IMPERIAL RIVIERA respondents in accordance with Management and other agreements (see chapter: ROLE OF VALAMAR RIVIERA d.d.).

If data are transferred to third countries as part of data processing, IMPERIAL RIVIERA ensures compliance with high protection standards in order to comply with the highest possible standard of personal data protection, in accordance with the strict requirements of the Regulation. Hence, when international transfers of personal data are in use, IMPERIAL RIVIERA will inform the data subjects about the intention to disclose personal data to a third country or international organization and about the existence or non-existence of a European Commission's decision on adequacy. Any transfer of personal data to third countries will be carried out in accordance with Chapter V of the Regulation.

DATA STORAGE RETENTION

Data subjects' data are processed and stored, in accordance with applicable legal regulations when the retention obligation is prescribed (for example, payrolls, analytical records of salaries for which mandatory contributions are paid are kept permanently, and accounting documents on the basis of which data is entered in the journal, general ledger and auxiliary books are kept for at least eleven years), and in situations where IMPERIAL RIVIERA is authorized to set retention periods, data is stored as long as necessary for the purposes for which personal data is processed taking into account the purpose of processing, the legitimate interests of IMPERIAL RIVIERA and the interests of the data subjects to delete the data.

RIGHTS OF THE DATA SUBJECTS

Regardless of the basis for data collection, all users of our website can exercise the following rights free of charge within the limits prescribed by the Regulation:

Right to information: The data subject has the right to be informed about the processing and its purposes. IMPERIAL RIVIERA provides the data subjects with all the information necessary to ensure fair and transparent processing, taking into account the context of processing.

Right to deletion ("right to forget"): The data subject has the right to request IMPERIAL RIVIERA to delete personal data relating to him/her, without undue delay in accordance with the terms of the Regulation. To do so, send your request to us (the processing manager) in writing, including an electronic form of communication. Please note that the request needs to specify what you wish to be deleted, since we can store your data on different legal bases, for example, the respondent can be both our guest and a candidate for employment.

You have the right to request the deletion of personal data relating to you if one of the following conditions is met:

- Your personal information is no longer necessary for the purpose for which we collected or processed it;
- you have withdrawn the consent on which the processing is based and if there is no other legal basis for processing;
- you have objected to the processing of your personal data and if there are no stronger legitimate reasons for our processing;
- personal data has been processed illegally;
- personal data must be deleted in order to comply with a legal obligation.

In some cases, it will not be possible to fully comply with the deletion request, for example when there is a legal obligation for retention, when the legitimate interest of the processing manager are stronger than the interest of the data subjects, when there is an interest of the processing manager to set, enforce or defend legal claims.

The right to access data: At the request of the data subject, IMPERIAL RIVIERA will provide him with confirmation whether his personal data is processed and if such personal data is processed, he will be granted access to personal data and the purpose of processing, data categories, potential recipients of the data to whom those data shall be disclosed, and other data in accordance with Regulation. The data subject is also entitled to receive a copy of the personal data being processed. Access to personal data may be restricted only in cases prescribed by law, i.e. when such restriction respects the fundamental rights and freedoms of others.

Right to rectification: The data subject has the right to obtain, without undue delay, the correction of incorrect personal data relating to him from IMPERIAL RIVIERA. Taking into account the purposes of processing, the data subject has the right to supplement incomplete personal data. To do so, send your request to us (the processing manager) in writing, including an electronic form of communication. We note that it is necessary to specify what is incomplete or not up-to-date in the request, and in what sense the above should be corrected and submit the necessary documentation in support of the allegations.

Right to data portability: The data subject has the right to receive personal data relating to him in a structured, commonly used and machine-readable format in accordance with the requirements of the Regulation.

Right to object: When IMPERIAL RIVIERA processes data on the basis of its legitimate interests which are stronger than the interests of the data subjects, then the data subject has the right to object to the processing of personal data related to him at any time.

Right to restricted processing: The data subject has the opportunity to ask IMPERIAL RIVIERA to exercise the right to restrict processing in case he disputes the accuracy of personal data, considers the processing to be illegal and opposes the deletion of personal data and instead requests restriction of their use, and has submitted a complaint and awaits confirmation as to whether the legitimate reasons of the processing manager go beyond the reasons of the data subject.

In any case, data subjects also have the right to:

- submit a complaint to the Personal Data Protection Official,
- file a complaint to the supervisory body (Personal Data Protection Agency) if they believe that their rights to data protection have been violated.

Send your written request to the contact address of the Personal Data Protection Official: gdpr@imperial.hr or by mail to the address Imperial Riviera d.d., Jurja Barakovića 2, 51280 Rab, Republic of Croatia - for DPO.

IMPERIAL RIVIERA as the Processing Manager has the right to protect the interests of the Processing Manager as well as the protection of the data subjects and accordingly has the right to carry out the activities of establishing the identity of the applicant.

IMPERIAL RIVIERA has the right to publish a form that will be used to submit a request in order to process the request as efficiently as possible.

On request, IMPERIAL RIVIERA provides information on the actions taken in relation to the exercise of data subject's rights without undue delay and in any case within one month from the date of receipt of the request. This period may be extended by an additional two months, taking into account the complexity and number of applications. IMPERIAL RIVIERA shall notify the data subject of any such extension within one month from the date of receipt of the request, together with the reasons for the postponement.

If the data subject submits the request electronically, IMPERIAL RIVIERA provides the information electronically if possible, unless the data subject requests otherwise.

The data subject's request is generally free of charge, but if the data subject's request is manifestly unfounded or excessive, and in particular because of their frequent repetition, IMPERIAL RIVIERA is entitled to charge a reasonable fee based on administrative costs or refuse to act on the request.

PROTECTION OF PERSONAL DATA OF CHILDREN

IMPERIAL RIVIERA advises parents and guardians to teach children (up to 18 years of age) about safe and responsible handling of personal data, especially on the Internet. IMPERIAL RIVIERA processes personal data of children only with the prior consent of parents/guardians (for example: scholarship holders, when children are guests at our properties, visitors to Maro playrooms, etc.).

PERSONAL DATA SOURCES

IMPERIAL RIVIERA receives personal data most often from data subjects. When providing personal data to IMPERIAL RIVIERA, in any way (booking accommodation, job application...) you guarantee that the information you have provided is correct, that you are legally capable and authorized to dispose of the given information and that you fully agree that IMPERIAL RIVIERA collects and uses your data in accordance with the positive regulations and terms of this Privacy Policy.

Also, IMPERIAL RIVIERA receives personal data from other natural and legal persons, for example: from Valamar as a company that manages certain business aspects of business, from travel agencies that forward guest data for accommodation, guests who book accommodation for people with whom they will stay in facilities, agency for employment mediation and assignment of workers, from the holder of accommodation reservations for others guests for whom the reservation is made. When providing personal data of other persons to IMPERIAL RIVIERA, you guarantee that the information you provide is accurate, that you are legally capable and authorized to dispose of the information, that respondents whose personal data you forward IMPERIAL RIVIERA agree that IMPERIAL RIVIERA uses and collects their data in accordance with positive regulations and the terms of this Privacy Policy.

TECHNICAL AND INTEGRATED DATA PROTECTION

IMPERIAL RIVIERA, as the processing manager, provides the highest organizational and technical standards of data protection. Therefore, considering the latest developments, the cost of implementation and the nature, scope, context and purposes of processing, as well as risks of different levels of probability and seriousness for the rights and freedoms of individuals arising from data processing, at the time of processing, appropriate technical and organizational measures to enable the effective application of the principles of data protection are applied.

Also, IMPERIAL RIVIERA implements appropriate technical and organizational measures to ensure that only personal data necessary for each specific purpose of processing are processed in an integrated manner. IMPERIAL RIVIERA applies this measure to the amount of personal data collected, the scope of their processing, the retention period and their availability. Specifically, such measures ensure that personal data is not automatically, without the intervention of an individual, available to an unlimited number of individuals.

TREATMENT OF PERSONAL DATA INFRINGEMENTS

As the data processing manager, IMPERIAL RIVIERA shall without undue delay and, where feasible, no later than 72 hours after discovering, notify the competent supervisory authority

about the breach, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

The report submitted to the supervisory authority shall contain all information prescribed by the Regulation.

In the event of a personal data breach that is likely to pose a high risk to the rights and freedoms of individuals, IMPERIAL RIVIERA, as the processing manager, shall inform the data subjects of the personal data breach without undue delay. Sometimes, in cases where the Regulation prescribes, informing data subjects is not mandatory.

SPECIFIC SECTION

STAY IN PROPERTIES (hotels, apartments, campings)

IMPERIAL RIVIERA'S main business activity is the provision of accommodation services in its hotels, apartments and campings. Therefore, IMPERIAL RIVERA collects and processes your personal data for various purposes with the ultimate goal of providing quality accommodation and related services all according to the highest standards of tourism companies.

IMPERIAL RIVIERA, as the processing manager, stores your personal data that you must provide for accommodation services in its database for the purpose of fulfilling accommodation contracts and fulfilling legal obligations related to the hospitality business. In case you do not provide IMPERIAL RIVIERA with the minimum data required for booking accommodation and for the registration to all competent registers, IMPERIAL RIVIERA will not be able to provide you with booking services or accommodation services in accordance with the contract and law.

Certain information is necessary in order to take action at the request of the data subject before concluding the accommodation contract. For example, before booking accommodation at the request of potential guests, we send accommodation offers, for which composition IMPERIAL RIVIERA needs personal data, at least name, surname and e-mail address in order to be able to send an offer.

The personal data that IMPERIAL RIVIERA collects when booking accommodation (reservations via the web or reservations by phone by via the call center or reservations by accepting the offer via e-mail) in order to fulfill the reservation obligation are:

- Name and surname of the reservation holder
- Residence address (Croatian citizens)
- Date of birth
- Number, type of identification document and place of issue
- Citizenship
- Property name
- Number of accommodation units, type of accommodation unit (room type)
- Date of arrival and departure
- Number of persons per accommodation unit
- Minors
- Possibly other specifics depending on the request of the person booking the accommodation
- e-mail if the person has one
- Language
- Phone number

- Membership in the Loyalty program, if it affects the price of accommodation or collecting points
- Payment method and possible additional information needed to execute the transaction or secure payment

In case of cancellation, we must save your data for the purpose of proving the reservation or cancellation.

Upon arrival at the property, guests usually check in at the reception via a registration card that the guest fills out or reviews and confirms the accuracy of the data or checks in using the self-check-in applications. In any case, the data is entered into the guest database from which the data is automatically sent to the eVisitor system (a unique online information system for registration and deregistration of guests) in order to comply with the legal obligations of IMPERIAL RIVIERA. The data collected are (data is subject to change due to changes in positive regulations):

- Name and Surname
- Place, country and date of birth
- Citizenship
- Number and type of identification document
- Residence and address
- Date and time of arrival or departure from the property
- Sex
- Basis for exemption from tourist tax payment or for reduction of tourist tax payment

This data are processed by tourist boards and public authorities of the Republic of Croatia for the following legal purposes:

1. monitoring the fulfillment of obligation to register and deregister tourists (accommodation service provider);
2. records, calculation and collection of tourist tax;
3. keeping a book or a list of guests by the service provider and monitoring the execution of the said obligation by the inspection bodies;
4. reporting foreigners to the ministry in charge of internal affairs and monitoring the execution of the stated obligation by inspection bodies;
5. keeping a list of tourists by tourist boards and statistical processing and reporting;
6. supervising the operations of the service provider in the part related to the legality of business conduct, i.e. the provision of registered services, and compliance with tax and other regulations concerning public liabilities.

Since it is prescribed that the data for guest registration is entered on the basis of data from the identity card, or travel or other identity document, the guest is obliged to provide IMPERIAL RIVIERA with such a document and provide all other information necessary for data entry, but are not contained in such a document. Also, in order to exercise certain rights and benefits, it is necessary to enclose (copies) of appropriate documents or certificates by which such rights and benefits are proven and exercised.

In addition, IMPERIAL RIVIERA is obliged to keep all invoices, as well as the basis for issuing invoices issued to guests with personal data of the guest in accordance with legal regulations.

Other data related to the circumstances of your stay such as: mode of travel, who you are traveling with, marital status, number of children, pets, other interests, will also be collected and processed during your stay when they have a direct connection with the accommodation service.

Before, during and after the stay IMPERIAL RIVIERA as the processing manager has the right based on the legitimate interest to send you so-called service messages - booking confirmations, reminders and other information closely related to the specific stay you have booked.

Also, during and after the stay, IMPERIAL RIVIERA as the processing manager has the right based on the legitimate interest to send to you as guest questionnaires about service satisfaction via e-mail, sms and/or instant messaging platforms (viber, whatsapp, etc.) which will be processed by us or through associates. The primary purpose of the service satisfaction questionnaire is to collect service data for the legitimate interest of service improvement by IMPERIAL RIVIERA, and IMPERIAL RIVIERA may depersonalize and process this data from the questionnaire for statistical purposes.

IMPERIAL RIVIERA has the right, based on a legitimate interest, to collect certain data and use it for direct marketing.

Service messages and messages with service satisfaction questionnaires related to a specific stay of the guest are not considered newsletters for the purpose of sending IMPERIAL RIVIERA offers and news.

EXCHANGE OFFICE

IMPERIAL RIVIERA also provides exchange services at its exchange offices, usually at the receptions of properties. IMPERIAL RIVIERA is obliged in accordance with applicable regulations on the prevention of money laundering and terrorist financing, in some cases to establish and verify the identity of the person using the exchange services by inspecting the official identity document of the party in his presence and perform in-depth analysis. In the event that we are unable to carry out in-depth analysis measures when required to do so, IMPERIAL RIVIERA must not establish a business relationship or perform a transaction, or must terminate an already established business relationship and consider whether to notify the competent authority of a suspicious transaction, funds and persons.

Also, in accordance with the regulations, video surveillance of exchange offices is mandatory. The data is stored in accordance with the regulations based on the legal obligation of IMPERIAL RIVIERA.

EXCURSIONS, CONCERTS, TRANSFERS AND OTHER EXPERIENCES

IMPERIAL RIVIERA is also a travel agency and provides or mediates additional services to its guests and other persons, being precisely: sales of various excursions, concerts, other experiences, transport services, car rental services and, if necessary, other services.

If you wish to use these services, IMPERIAL RIVIERA may collect the following information if necessary:

- Name and Surname
- contact information (phone and/or e-mail address)
- other information closely related to the services provided (for example: flight number if you are requesting a transfer from the airport to IMPERIAL RIVIERA; gender, citizenship, date of birth, type and number of identification document due to legal provisions related to border crossing if you want a cross-border trip).

The stated data, but also other depending on the specific service you are looking for, will be collected solely for the purpose of providing the service you want to use.

In the case of services organized by other associates, this information will be forwarded to the associate in charge of providing a particular selected service and they become the processing managers of the personal data and we kindly ask you to get yourselves familiar with their privacy policies.

In the case of sending personalized offers, at the request of the customer, the specified data is stored for two months.

Data collected by IMPERIAL RIVIERA during the provision of other services to guests or third parties (excursions, concerts, experiences, transport) requesting the services in question by phone, at receptions or via the web, will be kept for a maximum of 5 years for possible complaints about services provided, and longer only if it is so required by special regulations (accounting, etc.). For certain services (for example: rental of deck chairs, etc.) the data will be kept until the services are performed.

CANDIDATES FOR EMPLOYMENT AND EMPLOYEES

IMPERIAL RIVIERA is the employer of a large number of individuals and this part of the Policy regulates the protection of personal data primarily in the processes related to employment, development and education within IMPERIAL RIVIERA. In this sense, the data subjects are primarily former and current employees, job seekers, interns (students), professional development, students who work on the basis of the so-called student contract, scholarship holders and other persons whose data is processed within the framework of employment and related relations.

As part of the data processing carried out in connection with employment, IMPERIAL RIVIERA identified the following purposes of processing:

1. **Personnel selection:** includes the collection and further processing of relevant competition documents, testing and evaluation, collection and analysis of information on candidates from publicly available sources including information publicly disclosed about the candidate if relevant to the risks of the job.
2. **Reputation risk reduction:** collection and analysis of information about employees and persons in a comparable relationship from publicly available sources including information that the respondent has publicly disclosed about himself if this is important because of the risk that a particular job entails.
3. **Conclusion of the contract:** processing for the purpose of concluding an employment contract, student contract, professional internship or professional training, scholarship contract with persons not employed in IMPERIAL RIVIERA or any other comparable relationship.
4. **Exercise of material and other rights:** processing is necessary in order to exercise the material and other rights of workers, persons in a comparable relationship or other persons (e.g. children, spouses or insurance beneficiaries), for example to exercise the right to enter active employment policy measures (permanent seasonal and others), for the realization of additional rights of workers under the collective agreement IMPERIAL RIVIERA (for example: the birth of a child) and others.
5. **Fulfillment of the contract:** data processing is necessary for the purpose of fulfillment of the contract by the respondents, which includes fulfillment of work obligations, monitoring of their execution and ensuring all relevant measures for their execution.

6. **Registration of accommodation:** data processing is necessary in case the data subjects stay in the facilities for personal accommodation of workers in order to register their stay with the competent authorities.
7. **Performance Management:** this purpose includes information on the achievement of previously set goals, timely fulfillment of goals, and further analysis to determine future goals, human resources management, determining the amount of rewards and other relevant measures.
8. **Rewarding:** processing includes rewarding or payment of a fixed and variable part of the remuneration, where such processing may include data on violations of ethical and other internal rules, data from the performance management system, on attended trainings, as well as all other relevant data.
9. **Education:** processing for the purpose of educating persons acting under the guidance of IMPERIAL RIVIERA including knowledge tests, which includes all necessary actions for candidacy and registration of respondents, analysis of acquired knowledge and all other relevant information for organizing, implementing and further action in education process.
10. **Preparation of various reports on employees:** some reports are made for the legal obligation of IMPERIAL RIVIERA, some for the realization of certain rights, fulfillment of IMPERIAL RIVIERA's obligations in case of contracting and realizing additional benefits for workers, budgeting, etc.
11. **Information:** data collection and processing for the purpose of quality and timely informing candidates about open positions and competitions, i.e. employment opportunities within IMPERIAL RIVIERA. Collection and processing of data for the purpose of quality and timely informing all IMPERIAL RIVIERA employees about new changes or special notices important for the exercise of employment rights or important information in the field of general knowledge of events and activities in IMPERIAL RIVIERA regarding the exercise of employment rights or any comparable relationship. For this purpose, information is sent by phone and/or to official e-mail addresses, or private if the employee has given consent to use the e-mail address for this purpose. Furthermore, IMPERIAL RIVIERA may offer employees the use of applications that employees voluntarily install on their mobile devices through which they can find out various news related to IMPERIAL RIVIERA or its partners.
12. **Protection of property and persons:** includes monitoring of entry/ exit from business premises, use of official mobile devices, computer equipment, internet and telephone traffic, cars, premises, and other property of IMPERIAL RIVIERA as well as access to guest property in accordance with internal acts.
13. **Termination of employment:** data processing due to termination of employment contract or other comparable contract, in order to fulfill legal and contractual obligations.
14. **Ethical Behavior Monitoring:** processing includes all proceedings that investigate compliance with ethical conduct or dignity regulations, or in any other disciplinary action, whether the respondent is a reported person or a notifier.
15. **Work Safety:** data processing may be required in cases where it is necessary to fulfill the purpose of special work safety regulations, including alcohol testing in accordance with regulations.

IMPERIAL RIVIERA has a legitimate interest in realizing various benefits for its employees, as well as facilitating some business processes. In this sense, IMPERIAL RIVIERA can, based on a special decision, decide on various tools that achieve these purposes (for example, issuing ID cards to employees who receive discounts, giving certain instructions via SMS, taking photos in certain cases, etc.) in which case employees will be timely informed.

In addition to the stated purposes, it is possible to process personal data for other specific purposes, but always within the framework prescribed by law or if the processing is necessary for the exercise of rights and obligations arising from employment, or in relation to employment and any comparable relationship.

IMPERIAL RIVIERA's database on former and current employees, candidates, interns (students), professional training, students working on the basis of the so-called student contract, scholarship holders and other persons whose data is processed in the framework of employment and related relations is kept in a special application. An appropriate contract has been concluded with the application maintenance and support holder as the enforcer of personal data processing.

Personnel Selection

IMPERIAL RIVIERA as a potential employer collects, processes and stores the data of candidates for employment in IMPERIAL RIVIERA in the candidate database based on their voluntary application in the following ways:

- application of candidates via a web application form that serves as a kind of CV,
- Sign in via Email,
- by coming to organized auditions and filling out application forms,
- or otherwise.

Data which is usually collected is: name, surname, date of birth, address, nationality, personal identification number (OIB for Croatian citizens, as is it the most reliable data to differentiate candidates), mobile phone number, e-mail (for contacting), sex, qualifications, language, preferred manner of communication.

IMPERIAL RIVIERA may obtain information on candidates indirectly, from domestic and foreign employment agencies, in which case these agencies are obliged to inform candidates about the processing of their personal data by IMPERIAL RIVIERA.

Candidates send their job applications to:

- open applications in which case we process data for the purpose of contacting candidates regarding employment for 5 years;
- as applications for specific vacancies that have a specified deadline, in which case we process the data during the vacancy and 5 months from the end of the vacancy to contact candidates for employment, and these applications are archived for 5 years.

In the event that candidates who apply for specific vacancies that have a specified deadline give special consent, we process the data to contact candidates for employment for 5 years, as well as open applications.

IMPERIAL RIVIERA has a legitimate interest in using the obtained e-mail addresses, as well as other submitted contact information for contacting candidates related to employment. For example, after applying, candidates can receive an automatic response that their application has been received and that candidates whose qualifications and experience are in line with those required for individual jobs will be contacted. Also, after applying, candidates can receive a message on the phone number with the proposed date of the interview, a message stating the documentation required for employment and the like. Additionally, persons who have worked for a fixed period of time, predominantly seasonal jobs, IMPERIAL RIVIERA has a legitimate interest in contacting them in order to inform them on important issues concerning business and key activities in IMPERIAL RIVIERA and in order to maintain contact in case of future cooperation. You can unsubscribe from the list of recipients news from IMPERIAL RIVIERA for free, any time.

The data is kept provided by the candidates themselves, but IMPERIAL RIVIERA creates personal data related to employment activities, such as the results of job interviews, tests and assessments, based on the legitimate interest of ensuring the best candidates, and collects personal data from third parties, primarily by data verification obtained during the recruitment

process by contacting relevant third parties (for example: employment agencies, education and training providers) or by using publicly available sources.

Employment relation and other comparable relations

As an employer, IMPERIAL RIVIERA collects, processes and stores all employee data in the employee database kept in the IT program and in the physical files of employees. The data collected is listed in the Regulation on the content and manner of keeping records on workers published by the ministry responsible for labor and pension system.

The necessary information for employment is usually: a copy of the ID card, a copy of the current account or payment instructions from the bank, a copy of the protected account (if the employee has it), PIN, proof of education (copy of certificate or diploma), e-book: certificate of pensionable service, (to be obtained from HZMO or via the e-Citizens service), Electronic record of the tax card form, so-called PK form (obtained from the Tax Administration or through the e-Citizens service, persons who are employed for the first time, do not have an electronic record of the tax card form and must open it at the Tax Administration), birth certificate of a child under 15 years, certificate of residence (obtained from the Ministry of the Interior or through the e-Citizens service), wedding certificate (obtained from the registry office or through the e-Citizens service)

The necessary data for concluding student contracts are usually: a certificate from the faculty for the current year as proof of student status or a copy of the index of the enrolled current year, a copy of the ID card, a certificate of enrollment for the Student Center (not all student centers), one photo or X -ica card, PIN.

In addition to these data, IMPERIAL RIVIERA may keep in the employee's file other data collected in the employment process, as well as other data collected during employment determined by IMPERIAL RIVIERA regulations (for example: awards, reminders, certificates, etc.).

All employee data is stored in the employee database on the date of employment and are kept up to date until the termination of employment and are kept as documentation of permanent value in accordance with the relevant regulations.

IMPERIAL RIVIERA also keeps in its database the data of other persons in a business relationship comparable to the employment relationship or persons in practice and professional development with the beginning of work and promptly leads them to termination of work and are stored in accordance with relevant regulations. A special case is the data of students in practice who may be minors of whom is taken special care and whose data is collected and stored in accordance with special regulations with the approval of the school and parents.

Salary data, payroll - are subject to special storage regulations. In any case, all workers and other persons in a business relationship comparable to the employment relationship or a person in practice and on professional development have all the rights of a data subject.

BUSINESS PARTNERS

In its business operations, IMPERIAL RIVIERA also processes data from business partners or potential business partners, which are:

- natural persons who are, can become or have been business partners of IMPERIAL RIVIERA, e.g. craftsmen, persons who are in the regime of independent professions (e.g. lawyers, doctors, etc.), persons with whom work contracts are concluded (e.g. singers, painters, photographers, etc.) and other natural persons who have the status of entrepreneurs and
- natural persons who in some part of the business represent legal entities with which IMPERIAL RIVIERA has, may have or had a business relationship (e.g. persons who deliver for their employer company, persons to whom invoices are sent for their employer legal entity, signatories of contracts for companies representing persons who hand over for the company, persons who organize congresses for their legal entity, etc.)

As part of the data processing of data subjects, IMPERIAL RIVIERA identified the following purposes of processing:

- a) **Conclusion of the contract:** processing for the purpose of concluding the contract from any area of IMPERIAL RIVIERA's activity (for example: sending inquiries, sending special offers, requesting data on the signatories of the contract, sending tenders for legal entities represented by data subjects, etc.);
- b) **Fulfillment of the contract:** data processing is necessary for the purpose of fulfilling the contract, which includes fulfilling obligations, monitoring their execution and ensuring all relevant measures for their execution (for example: to agree on time and place of delivery of equipment under the contract, to send invoices, etc.);
Information: data collection and processing for the purpose of quality and timely information; IMPERIAL RIVIERA has the right, based on legitimate interest, to collect certain data and use it for the purpose of direct marketing.

In addition to the stated purposes, it is possible to process personal data for other specific purposes, but always within the framework prescribed by law or if the processing is necessary for the exercise of rights and obligations arising from the business relationship.

The type of personal data collected from data subjects are:

- Name and Surname,
- E-mail,
- Phone Number,
- data on the function within the legal entity he represents (eg sales clerk, secretary of the administration, etc.),
- occupation when the data subject is a natural person with whom a contractual relationship is entered into (for example: singer, painter, photographer, lawyer, doctor ...),
- sometimes references and short CVs (especially for consultants),
- data stated on the forms of blank promissory notes, promissory notes, bills of exchange,
- bank account number (IBAN) when the business partner is a natural person with whom a contractual relationship is entered into, and
- other information depending on the nature of the business relationship.

Places of personal data collection of data subjects:

- received offers of data subjects for business cooperation,
- data received from data subjects in the context of selling IMPERIAL RIVIERA products / services or purchasing products / services from a business partner (for example: fairs, congresses, etc.),
- business correspondence related to certain previous or current business cooperation (for example, correspondence performed as part of the execution of a contract),
- publicly published data (for example: court register, business partner websites, magazines, newsletters, etc.).

In addition to the stated type and place of data collection, it is possible to process personal data for other specific purposes, but always within the framework prescribed by law or if the processing is necessary for the exercise of rights and obligations arising from the business relationship.

Retention period

Data kept from data subjects who are natural persons in a business relationship with IMPERIAL RIVIERA are kept in accordance with applicable legal regulations (for example, IMPERIAL RIVIERA is obliged to keep all invoices, as well as the basis for issuing invoices in accordance with legal regulations.).

In situations when IMPERIAL RIVIERA is authorized to set deadlines for data retention, they are determined taking into account the purpose of processing and the interests of data subjects to destroy the data, and this is set at a maximum of 5 years from the termination of the contractual relationship (if any).

PUBLIC ANNOUNCEMENTS

IMPERIAL RIVIERA can through its website, video walls, billboards in buildings and in other ways publish information that is of interest to existing but also potential workers, guests, business partners, and therefore the public. Such disclosures may contain a limited set of personal information, such as first and last names, functions, professional information, videos, statements and photographs.

The legal basis for processing is the legitimate interest of informing the public, but also marketing, during which the interest of the data subjects is always taken into account, so personal data is not published if it is determined that the interest of data subjects not to publish certain personal data is stronger than the interest of IMPERIAL RIVIERA to publish them. In some situations, the disclosure of information may be based on consent in accordance with the highest standards.

Announcements have a permanent character, which ensures information about current events as well as insight into previous activities.

Processing shall cease if, on the basis of the data subjects' objection, it is established that such objection is justified or if the data subject has withdrawn the consent in situations where the consent is applicable in a manner that can be enforced.

VIDEO SURVEILLANCE

IMPERIAL RIVIERA, as the processing manager, has a legitimate interest in implementing video surveillance measures to protect property and persons, and in certain cases (such as: exchange offices which are located at reception desks of the properties), and has the legal duty to install surveillance cameras that record all persons moving around the perimeter of the surveillance camera (guests, employees, business partners, etc.).

The processing of personal data of employees via video surveillance is also enforced through conditions provided by provisions which regulate work safety.

IMPERIAL RIVIERA marks all places where video surveillance is installed in the prescribed manner.

IMPERIAL RIVIERA is aware that the videos contain personal data of all persons moving around the perimeter of the camera, and therefore keeps them with special care, has a regulated system of security, availability and deletion policy in accordance with IMPERIAL RIVIERA's internal safety rules.

Videos are automatically deleted after a maximum of 15 days from the date of recording. In case of exceptions (recording over), videos are kept for maximum period of 6 months, or longer in case law prescribes it or in case the tape is evidence in a legal, administrative, arbitration or other equivalent procedures. Videos being excepted shall be stored in centrally-informing system with extremely limited approach.

In the event of court and/or criminal proceedings, IMPERIAL RIVIERA may use these videos. Insight into personal data on videos may also be obtained by third parties, data processors, contractual partners of IMPERIAL RIVIERA registered and professional for the provision of services for the protection of persons and property, who in no way use the data independently but take care of the security of central surveillance and reporting system. Special regulations governing the area apply to all other details related to video surveillance.

FINAL PROVISIONS

This Privacy Policy is available at <http://imperial-riviera.hr/uploads/privatnost/en/IR-PRIVACY-POLICY.pdf> as well at the human resources offices and receptions of IMPERIAL RIVIERA's properties.

IMPERIAL RIVIERA reserves the right to change and / or amend these Privacy Policies at any time, and will update the Privacy Policy on the above media.