

## PRIVACY POLICY

In this document you will find description of the way your personal data is processed, in relation to using our services and website [www.kwhotel.com](http://www.kwhotel.com).

### 1. Who is the Administrator of your data?

Your data Administrator is Starline Anna Lech company (later referred to as Starline) located at: Borowinowa St. 53a/18, 30-698 Cracow, Tax ID 681-181-88-32 REGON 122855810. Starline is a distributor of hotel software.

### 2. How is your data acquired?

We only process personal data which you freely shared with us. Data which is processed, is necessary to perform our contracts or for reasons resulting from our legitimate interests.

It is especially data which is provided in the following situations:

- a. By voluntarily entering information into the form placed on [www.kwhotel.com](http://www.kwhotel.com) website.
- b. When placing an order in our shop.
- c. When contacting our Team. This means sending a message to [support@kwhotel.com](mailto:support@kwhotel.com), [support@kwhotel.it](mailto:support@kwhotel.it) or [support@kwhotel.gr](mailto:support@kwhotel.gr) or by sending us a message via contact form provided on our website ([www.kwhotel.com](http://www.kwhotel.com)) or by calling our Team at +48 12 333 78 77, +30 211 198 32 57 or +39 069 480 09 92.
- d. By saving Cookie files in your terminal device.

### 3. Who you may contact in regards to processing your personal data?

In case of any questions or doubts, we are at your disposal from Monday to Friday, 8:00 – 16:00 (GMT +1.00). Please send us your queries to our Personal Data Officer at [support@kwhotel.com](mailto:support@kwhotel.com) or via our phone line at +48 12 333 78 77.

### 4. What is the purpose of processing your personal data and on what legal basis will we process your personal data?

The “GDPR” ordinance (Regulation of the European Parliament and the Council (UE) 2016/679 from 27.04.2016, in regards to personal data processing and in regards to the free movement of such data and the repeal of the directive 95/46/WE) provides for several types of legal grounds for data processing, in our case:

- a. the necessity of processing to conclude or perform the contract to which you are a party. For us, the agreement is primarily the Terms and Conditions of Sale as well as the License Agreement. If, therefore, we conclude an agreement with you for the implementation of a specific service, we can process your data to the extent necessary to implement this contract. Their processing serves, among others, the fulfillment of statutory obligations (e.g. archiving for tax and accounting purposes).
- b. the necessity of processing for purposes arising from our legitimate interests. They include, among others, the need to ensure the security of our services, proper customer service, technical assistance, statistical measurements, improvement of our services, matching them to the needs and convenience of users, as well as marketing and promotion of our own.
- c. your voluntary consent. We need it so that we can send you our newsletter. You can express two consents – consent to receive instructional materials and notifications about new functions of the KWHotel program via e-mail, and consent to receive information about special offers for Starline services via e-mail. Granting such consent is entirely voluntary, and you do not have to give it if you do not want to. You can change your consents at any time.

#### **5. Until when will we store your data related to registration in our system and use of our services?**

Below you will find regulations regarding the length of storing your data:

- a. In the event of the necessity of data for the performance of the contract, your data will be processed for the duration of the contract and archived for one year from the date of its termination. Archiving this data is in your best interest – it enables you to quickly restore deactivated services. Due to the necessity of fulfilling tax and accounting obligations, some of this personal data will be stored for a period of 6 years from the date of execution of individual sales contracts.
- b. Where the basis for data processing is the legitimate interest of the controller, until such justified interest exists.
- c. In the case of consent, until it is withdrawn.

#### **6. Do we use profiling?**

Your personal data is not subject to automated processing (e.g. profiling) that has legal consequences or has a significant effect on you.

#### **7. Who can we pass your data to, and to whom we will not pass it on?**

Personal data may be disclosed to Starline employees or associates, as well as to entities providing support to the company on the basis of outsourced services and in accordance with the contracts entrusted to entrust personal data for processing.

Starline obliges cooperating entities and employees employed in the processing of personal data to maintain confidentiality, as part of professional secrecy, any information or personal data to which they

may have access in connection with performing activities in the processing of personal data, as well as not disclosing the protection measures used and security.

Your personal data will not be sold or transferred to third parties for purposes other than those described above.

#### **8. Is your data transferred outside of the European Union?**

The processing of entrusted personal data takes place in the European Economic Area.

#### **9. How can you control the data shared with us? How can you revoke your consent to data processing?**

You always have the right to inspect and improve the data we store. We rely on you regarding the completeness, accuracy and timeliness of your personal data, so please inform us immediately of any changes or inaccuracies.

You can verify and modify your data and consents by logging in to the Customer Panel. You may also ask us for a list of processed data and consents via email.

If we use your personal data based on your consent, you have the right to withdraw your consent at any time, in accordance with applicable law.

#### **10. What are your rights to the personal information you provide us with?**

You have the right to:

- a. access your data and rectification,
- b. in justified cases, you can ask us to remove or restrict the processing of your personal data or to object to specific ways we use your personal data,
- c. in justified and properly documented cases, you can ask us to send your personal data to third parties.

#### **11. Is it your responsibility to provide data?**

The use of our services is fully voluntary. Providing data by you does not result from any legal obligation. However, it may be necessary to establish cooperation with us.

#### **12. Where can you file a complaint regarding the processing of your personal data?**

Currently, such complaints should be directed to the General Inspector for Personal Data Protection. After May 25, 2018 (i.e after the entry into force of the “GDPR” Regulation), this office will be called the “President of the Office for Personal Data Protection”.

### 13. Information on Cookie files.

- a. The website makes use of Cookie files.
- b. The website may save additional information on the connection parameters (time stamp, IP address).
- c. Cookie files comprise of data, in particular text files, which are kept in the terminal device of the Webpage's user and are intended for the use of the Webpage, from which they derive. Cookie files typically contain the name of the Website, from which they derive from, the time stamp of how long the files have been kept on the terminal device and a unique number,
- d. The subject placing the Cookie files on the terminal device and gaining access to them is the Operator of the Website.
- e. Cookie files are used for the following purposes:
  - Creating statistics, which help with understanding how the Website's Users make use of the webpages, which allows for the improvement of the structure and content;
  - Maintaining the Webpage User's session (after logging in), thanks to which the login and password is not required on each webpage;
  - Adjusting the content of the Website to the preference of the User and for the optimal use of the webpages; in particular the files allow for the recognition of the Website User's device and accordingly display the webpages, adjusting them to the individual needs;
- f. As part of the Website the following Cookie files are used:
  - „necessary” Cookie files, which allow for the usage of the services available on the Website, e.g. authorizing Cookie files, used for services on the Website requiring authorization;
  - Cookie files ensuring security, e.g. used to detect the misuse of the authorization on the Website.
  - „performance” Cookie files, allow for the gathering of information on the usage of the pages of the Website;.
  - „functional” Cookie files, allow for the „saving” of selected User' settings and personalize the User's interface, e.g. picking the language or location of the User, size of the font, look of the webpage etc.;
  - „publicity” Cookie files, allow the Users to receive advertisement adjusted to the users interests.
- g. The software to browse internet Websites (internet browser) standardly allows for the saving of Cookie files in the User's terminal device. The Website users may carry out changes in this matter. Internet browsers enable the removal of Cookie files. It is possible to automatically block Cookie files as well. Detailed information on this matter may be found in the Help or documentation of the internet browser.
- h. Limiting the use of the Cookie files may influence some of the functions available on the Website.
- i. Cookie files placed in the User`s terminal device and used, may be also used by advertiser and partners collaborating with the Website Operator.
- j. It is advised to read the privacy protection policies of these companies, to learn their rules on the use of Cookie files used in statistics: [Google Analytics Protection of privacy policies](#)

- k. Cookie files may be used by marketing companies, in particular that under Google, to display advertisement adjusted the way users make use of the Website.
- l. Information on the preferences of the user acquired from the Cookie files and are collected by the Google marketing company may be reviewed and edited by the user with the help of the tool : <https://www.google.com/ads/preferences/>

#### 14. Managing Cookie files – how to give and retract permission in real terms?

- a. If a user does not wish to receive Cookie files, he may change the settings of the browser. Please note, turning off the use of Cookie files necessary to run the processes of authorization, security, up keeping the preferences of the user may hinder and even prevent the use of the Website. ,
- b. To manage the settings of the Cookie files, please pick a browser/system from the list below and follow the instructions:
  - [Internet Explorer](#)
  - [Chrome](#)
  - [Safari](#)
  - [Firefox](#)
  - [Opera](#)
  - [Android](#)
  - [Safari \(iOS\)](#)
  - [Windows Phone](#)
  - [Blackberry](#)
- c. More information on Cookie files may be found under the internet address <http://www.allaboutcookies.org/> or in the "Help" section in you Browser's menu.