

## PERSONAL DATA PROTECTION POLICY

We value your privacy and are committed to protection your personal data. Below you can find all necessary information regarding the processing of your personal data we collect. This Personal Data Protection Policy is issued in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data in order to comply with the information duty of our company as the controller pursuant to Article 13 of the GDPR.

For the purposes of providing (or creating) membership and sending commercial and service communication, ensuring services, answering inquiries, complying with legal duties, it is necessary to process identification and contact details of the clients, other members, visitors to the platform or persons requesting more detailed information as potential clients to make them unique in business contact with third parties offering their services and tourism products on the platform. Such data are also required for sending notifications and notices relating to the membership in the platform. Data collected from providers are processed in compliance with the GDPR.

## PERSONAL DATA CONTROLLER

The controller of your personal data is **GESTILAND 2000 S.L.**

### Contact details:

- **address:** Calle Minerva No 2., 386 30 Costa del Silencio, Arona SC de Tenerife Spain
- **e-mail:** [info@victoriaholidayclub.com](mailto:info@victoriaholidayclub.com)
- **telephone:** +34 922786354

## SCOPE AND PURPOSE OF PROCESSED PERSONAL DATA

Personal data means any information relating to an identified or identifiable natural person.

Personal data are collected directly from you through telephone and e-mail communication or via the website [www.victoriaholidayclub.com](http://www.victoriaholidayclub.com) (such as enquiry form, online chat).

In connection with the performance of contracts or on the basis of the consent given by you, we can process the **following personal data:**

- name and surname
- date of birth
- address
- e-mail and telephone number
- payment details

## WE PROCESS YOUR PERSONAL DATA:

- on **legal grounds**
- **transparently and correctly** with respect to you as the data subject
- personal data are collected only for **certain and legitimate purposes of processing** and only **insofar as is strictly necessary**
- for **as long as necessary**, i.e. for a period of time during which we provide services and products to you and also 3 years after the termination of such period
- we take care that the processed data are **accurate, correct and updated**

This Personal Data Protection Policy is valid and effective since 25 May 2018.

Your personal data are processed for the following **purposes**:

- conclusion and performance of contracts (membership contracts)
- provision of services
- responding to inquiries (by telephone, e-mail, online chat, etc.)
- sending commercial communication (newsletters and other announcements, e-mail, SMS)
- web analytics
- complying with legitimate duties
- selection procedures for vacancies.

Our company does not make any automated individual decision-making pursuant to Article 22 of the GDPR.

### HOW ARE YOUR PERSONAL DATA HANDLED

We handle the personal data we collect in compliance with the Personal Data Protection Act and the GDPR. **We represent and warrant that we have taken technical and organisational measures necessary to protect the personal data** and that personal data may be accessed by authorized persons only.

In the case of your business contact with third parties offering their services and tourism products on the platform and subsequent provision of the personal data regarding the recipient and other parties to such third parties, the personal data are not provided to the provider but to such third parties.

In order to ensure services and fulfil membership contracts, your personal data will be, insofar as is necessary, provided to third parties, specifically to service providers, including (without limitation) hotels and tourist accommodation establishments, transport companies, embassies of foreign countries, guides, insurance companies, external accounting firms or IT companies.

The processors are companies based both in the territory of the Czech Republic and European Union member-states or so called secure countries. In the case of your package trip to a destination outside the EU, the data are transferred to recipients in the destination (third country). Personal data are transferred and processed in the countries outside the European Union in compliance with the applicable legislation.

The provider can also provide your personal data to public authorities pursuant to the legislation applicable to the controller.

### STORING COOKIES

In connection with the use of the platform, our company use cookie files to processes personal data. The purpose of such processing is analytics (web traffic, inquiries, etc.), monitoring the movement on the platform, optimizing the platform, managing the platform, collecting demographic information and obtaining other information on the platform use.

### RIGHTS WITH REGARD TO PERSONAL DATA PROCESSING

Your rights as the data subject under GDPR include (without limitation) the right to be informed about processing of your personal data. You have the right to information about the purpose of processing or about the identity of the controller and its legitimate interests. Pursuant to GDPR, you have the right of access to your personal data (Article 15 of GDPR), the right to rectification or completion of inaccurate data (Article 16 of GDPR), the right to erasure of your personal data (Article 17 of GDPR), the right to restriction of processing (Article 18 of GDPR), the right to data portability (Article 20 of GDPR), the right to object to personal data processing (Article 21 of GDPR), the right not to be subject to a decision based solely on automated processing (Article 22 of GDPR) as well as the right to lodge a complaint with a supervisory authority – The Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7 (Article 77 of GDPR).

#### ➤ RIGHT OF ACCESS TO PERSONAL DATA

You have the right to know if we process your personal data, and where that is the case, you have the right of access to your personal data. As part of this right, you can request a copy of the personal data undergoing processing. In the event of unjustified, unreasonable or repeated requests, we are entitled to charge a reasonable fee for a copy of the personal data undergoing processing or to reject such request (the foregoing shall apply by analogy to the exercise of the rights mentioned below).

➤ **RIGHT TO RECTIFICATION OF INACCURATE AND COMPLETION OF INCOMPLETE PERSONAL DATA**

If you assume that your personal data undergoing processing by us are inaccurate or incomplete personal data, you have the right to request their rectification or completion. Our company will rectify or complete the personal data as far as technically feasible without undue delay.

➤ **RIGHT TO ERASURE**

If you request erasure of personal data undergoing processing by us, the data will be erased provided that:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- you withdraw your consent and where there is no other legal ground for the processing
- you object to the processing (see below) and there are no overriding legitimate grounds for the processing
- the personal data have been unlawfully processed,
- the personal data have to be erased for compliance with a legal obligation,
- the personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

➤ **RIGHT TO RESTRICTION OF PERSONAL DATA PROCESSING**

Pursuant to Article 18 of the GDPR, you as the data subject have the right to restriction of processing until your complaint is resolved, should you contest the accuracy of the personal data, the grounds for their processing or if you have objected to the processing of your personal data, by sending a written request to the address: VICTORIA Holiday Club s.r.o., Brno Spielberk, Holandská 878/2, 639 00 Brno.

➤ **RIGHT TO DATA PORTABILITY**

If you request to receive from our company the personal data concerning you so that they could be transferred to a third party, you can use your right to data portability. Your personal data will be provided in a structured, commonly used and machine-readable format. This shall apply only to data processed by automated means in our electronic databases. If the exercise of such right could adversely affect the rights and freedoms of others, we may refuse to comply with the request.

➤ **RIGHT TO OBJECT**

You as the data subject have the right to object to processing of your personal data, on grounds of legitimate interests of our company. If our company fails to demonstrate compelling legitimate grounds for the processing, which must also override the interests, rights and freedoms of the data subject, our company shall cease the processing without undue delay. Objections may be lodged in writing at the address: VICTORIA Holiday Club s.r.o., Brno Spielberk, Holandská 878/2, 639 00 Brno, Czech Republic.

➤ **RIGHT TO LODGE A COMPLAINT**

The rights mentioned above shall be without prejudice to your right to lodge a complaint with a supervisory authority, in particular, if you assume that your personal data are processed unlawfully or in violation of the legislation.

**CONTACT DETAILS OF SUPERVISORY AUTHORITY**

**Address:**

Úřad pro ochranu osobních údajů/Office for Protection of Personal Data  
Pplk. Sochora 27  
170 00 Praha 7

Data box: qkbaa2n

e-mail: [posta@uoou.cz](mailto:posta@uoou.cz)

telephone: +420 234 665 111 (switchboard)

## CONSENT TO THE PROCESSING OF PERSONAL DATA

In order to improve the quality of our services, we would like to ask you for your consent to the processing of your personal data (name and surname, address, e-mail and telephone number) for the purpose of mailing marketing notifications related to the subject matter of the Company's activities. It concerns, including but not limited to, the service of mailing notifications about convenient discounts or events that we provide as a part of our customer care.

We inform you that the consent is entirely voluntary and can be withdrawn at any time by sending an e-mail to [info@victoriaholidayclub.com](mailto:info@victoriaholidayclub.com) or by sending a letter to the address VICTORIA Holiday Club s.r.o., Brno Spielberk, Holandská 878/2, 639 00 Brno. You are also subject to all rights under the Rights section in connection with your personal data protection, except for the right to object which is contrary to the right to withdraw the consent.

The provisions of Section IV hereof shall apply with necessary modifications.

**I authorize herewith GESTILAND 2000 S.L.; Calle Minerva No 2., 386 30 Costa del Silencio, Arona SC de Tenerife Spain, CIF: B-38584785; represented by VICTORIA Holiday Club s.r.o., Company ID No.: 06961151, registered office at Holandská 878/2, Štýřice, 639 00 Brno (hereinafter referred to as the "Controller"), to process the following personal data in compliance with the GDPR:**

- name and surname;
- date of birth;
- address;
- e-mail;
- phone number;

**for the purposes of mailing marketing notifications related to the activity of the Company by the controller and/or provided/mediated by the controller (via a message/e-mail). I agree that the controller provides my personal data for the purpose of processing to other processors. In particular, it concerns the service of mailing notifications about convenient discounts or events that is provided in the framework of the customer care.**

## AMENDMENTS TO PERSONAL DATA PROTECTION POLICY

The Provider reserves the right to amend or supplement this Personal Data Protection Policy at any time.

***We value your privacy. Should you have any questions regarding the protection of your personal data or should you wish to find out more information, do not hesitate to contact us using the [inquiry form](#).***