

PRIVACY POLICY

Data Controller: Stella Vision, s.r.o., Komenského 361, 908 77 Borský Mikuláš

Dated: January 31, 2025

1. Introduction and Legal Framework

This Privacy Policy explains how Stella Vision s.r.o., as the data controller, processes the personal data of guests, website visitors, prospective guests, business partners, and other data subjects.

We process personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), Act No. 18/2018 Coll. on the Protection of Personal Data, Act No. 452/2021 Coll. on Electronic Communications, and other relevant legal regulations of the Slovak Republic.

If you have any questions regarding the processing of personal data or wish to exercise your rights, please contact us at info@designvillastella.sk.

2. Basic Terms

- Data Subject: a natural person whose personal data is being processed, in particular a guest, a person interested in accommodation, or a website visitor.
- Personal data: any information relating to an identified or identifiable natural person.
- Controller: the entity that determines the purposes and means of processing personal data. The controller is Stella Vision s. r. o.
- Processor: an entity that processes personal data on behalf of the controller based on a contract or authorization.
- Cookies: small text files stored on a user's device when visiting a website.
- Third country: a country outside the European Economic Area.

3. Categories of Personal Data Processed

Depending on the specific situation and purpose, we may process the following categories of personal data in particular:

- identification data: first name, last name, title, date of birth, nationality, ID number, and, if applicable, other data required for the legal registration of guests;
- contact information: email address, phone number, mailing address;
- reservation and contractual data: arrival and departure dates, number of guests, reservation type, accommodation preferences, communication history, payment details, and billing information;
- accounting and tax data: information listed on invoices, receipts, and accounting records;
- Communication data: content of messages sent via the contact form, email, phone, or social media;
- technical data from the website: IP address, cookie identifiers, data about the device, browser, and operating system, date and time of visit, pages visited;
- marketing data: newsletter consent, communication preferences, information about newsletter opens and clicks;
- CCTV recordings: visual recordings of individuals in monitored areas of the facility, if the individual is present in those areas.

4. Purposes, Legal Bases, and Retention Periods

Purpose of processing	Legal basis	Retention period
Processing of an inquiry or contact form	Article 6(1)(f) of the GDPR, legitimate interest in communicating with prospective customers	Generally 12 months from the date the inquiry is processed, unless a contractual relationship is established
Reservation and Provision of Accommodation	Article 6(1)(b) of the GDPR, performance of a contract or pre-contractual measures	for the duration of the contractual relationship and subsequently, generally, 4 years to protect legal claims
Guest registration and compliance with the accommodation provider's legal obligations	Article 6(1)(c) of the GDPR, compliance with a legal obligation	for the period required by applicable laws
Accounting, taxes, and invoicing	Article 6(1)(c) of the GDPR	10 years from the end of the fiscal year to which the document relates
Handling of claims, complaints, and legal claims	Article 6(1)(f) of the GDPR, protection of rights and legitimate interests	for the duration of the proceedings and subsequently for the statutory limitation periods
Sending marketing communications to existing customers	Article 6(1)(f) of the GDPR, legitimate interest in direct marketing communications regarding similar services	until an objection is raised or the recipient unsubscribes from the communications
Sending newsletters to individuals who are not our customers	Article 6(1)(a) of the GDPR, consent	until consent is withdrawn, for a maximum of 4 years from the date of consent or the last activity
Website operation and essential cookies	Article 6(1)(f) of the GDPR, legitimate interest in a functional and secure website	Depending on the lifespan of the specific essential cookie or log

Purpose of processing	Legal basis	Retention period
Analytical and marketing cookies, Google Analytics, Google Ads, Meta Pixel	Article 6(1)(a) of the GDPR, user consent	Depending on the cookie tool's settings, for no longer than the duration of the consent
CCTV system on the premises	Article 6(1)(f) of the GDPR, legitimate interest in protecting the life, health, property, and safety of guests and preventing damage	Generally 30 days; in the event of an incident, for the time necessary to investigate and pursue claims

5. Obligation to Provide Personal Data

Providing the personal data necessary for making a reservation and providing accommodations is a contractual requirement. Without this data, it is not possible to process the reservation or properly provide accommodations.

You are required to provide the data necessary to fulfill legal obligations—in particular the accommodation provider's accounting, tax, or record-keeping obligations—to the extent required by law. Failure to provide this data may mean that the service cannot be provided or that a receipt cannot be issued in accordance with the law.

Providing data for marketing purposes and the use of analytical or marketing cookies is voluntary. Consent may be withdrawn at any time without affecting the lawfulness of processing prior to its withdrawal.

6. Recipients of Personal Data

Personal data may be disclosed only to the extent necessary to the following categories of recipients:

- providers of IT services, hosting, website management, and cybersecurity;
- providers of reservation, payment, and billing systems, if used;
- accounting, tax, and legal advisors;
- providers of email and marketing tools;
- providers of analytics and advertising services, in particular Google Ireland Limited and Meta Platforms Ireland Limited, if the relevant tools are activated based on consent;
- providers of CCTV system maintenance and management services, if they have access to recordings;
- public authorities, in particular courts, law enforcement agencies, administrative authorities, tax authorities, or other authorities, if required by law.

We use processors only on the basis of a personal data processing agreement or another legal basis, and we require them to implement appropriate technical and organizational data security measures.

7. Transfer of Personal Data Outside the EEA

As a general rule, we do not make personal data available for sale to third parties. However, when using certain technological, analytical, or advertising services, personal data may be transferred to or accessed remotely from third countries, particularly the United States of America.

If such a transfer occurs, we will ensure that it is carried out only in compliance with the conditions of the GDPR, specifically based on a European Commission adequacy decision, the provider's certification under the EU-US Data Privacy Framework, standard contractual clauses, or another appropriate mechanism under the GDPR.

8. CCTV System at the Accommodation Facility

A CCTV system is in operation on the premises of the accommodation facility. The CCTV system is used exclusively to protect the life, health, and safety of guests and staff; to protect property; to prevent damage; and to investigate security incidents.

Cameras may monitor, in particular, entrance areas, the exterior of the building, parking or access areas, and common areas. The CCTV system is not intended to monitor guest rooms, bathrooms, restrooms, or other areas where guests' privacy would be unduly infringed upon.

The legal basis for processing is the controller's legitimate interest pursuant to Article 6(1)(f) of the GDPR. Video recordings are generally retained for 30 days. If a recording captures a security incident, damage, offense, or other event, it may be retained for a longer period, but no longer than is necessary to investigate the incident, protect legal claims, or transfer the recording to the relevant authority.

Monitored areas are marked with a visible information sign. Access to camera recordings is restricted to authorized personnel and, where applicable, the contracted technical service provider for the system. Recordings may be made available to public authorities, particularly the police or courts, if required by law or to protect legal claims.

9. Automated Decision-Making and Profiling

When processing personal data, we do not engage in decision-making based solely on automated processing, including profiling, that would produce legal effects on the data subject or similarly significantly affect them.

Analytics and marketing tools may evaluate user behavior on the website for the purpose of measuring traffic or displaying relevant advertisements only if the user has given consent via the cookie banner.

10. Cookies and Similar Technologies

We use cookies and similar technologies on the website. We may use essential cookies without consent, as they are necessary for the website to function. We use analytical, preference, and marketing cookies only based on your prior consent.

Type of Cookies	Purpose	Legal Basis
Essential cookies	Ensuring the basic functioning of the website, security, storing consent settings	No consent required
Preference cookies	Remembering user preferences, e.g., language or display settings	Consent
Analytical cookies	Measuring website traffic and user behavior, e.g., Google Analytics	Consent
Marketing cookies	Displaying targeted ads and measuring campaign performance, e.g., Google Ads or Meta Pixel	Consent

When you first visit the website, a cookie banner will appear, allowing you to accept all cookies, reject all non-essential cookies, or configure individual categories. You can change or withdraw your consent at any time via the cookie settings on the website or your browser settings.

We do not assume consent solely based on your continued browsing of the website. Non-essential cookies are activated only after consent is granted.

11. Protection of Personal Data

We have implemented appropriate technical and organizational measures to protect personal data against unauthorized access, loss, misuse, alteration, or destruction. These measures include, in particular, securing the website with an SSL certificate, restricting access to data to authorized personnel only, contractual safeguards for data processors, confidentiality obligations for authorized personnel, and appropriate access controls.

We continuously evaluate our security measures, taking into account the nature of the processing, available technical solutions, and the level of risk to the rights and freedoms of data subjects.

12. Rights of Data Subjects

In connection with the processing of personal data, you have the following rights in particular:

- the right to access personal data;
- the right to have inaccurate data corrected or incomplete data supplemented;
- the right to erasure of personal data, provided that the legal conditions are met;
- the right to restrict processing;
- the right to data portability;

- the right to object to processing based on legitimate interests, including direct marketing;
- the right to withdraw consent if processing is based on consent;
- the right not to be subject to a decision based solely on automated processing if it would have legal or similarly significant effects.

You may exercise your rights by email at info@designvillastella.sk or in writing to the controller's registered office address. We will generally respond to your request within one month of receiving it. This deadline may be extended in justified cases in accordance with the GDPR.

13. Right to File a Complaint

If you believe that the processing of your personal data has violated legal regulations, you have the right to file a complaint with the supervisory authority:

Office for Personal Data Protection of the Slovak Republic, Hraničná 12, 820 07 Bratislava 27, Slovak Republic, tel.: +421 2 3231 3214, website: [Office for Personal Data Protection of the Slovak Republic](http://www.uzo.gov.sk)

14. Final Provisions

We may update this policy from time to time, particularly in the event of changes to legal regulations, changes in the technologies we use, or changes in the way we process personal data. The current version will always be published on the designvillastella.sk website.