

Internal Regulation Regarding the Protection of Personal Data HARMONIA MUNDI GUESTHOUSE DATA PROTECTION

I. Data Controller

Accommodation unit: Harmonia Mundi
Company: SC Davant Food SRL
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Our company respects the personal rights of its Clients, therefore it has developed the following Data Processing Regulation (hereinafter: Regulation), which is available electronically on the official website of the Company, and in paper format at the reception.

The Company, as the data controller, declares that it conducts data processing in accordance with the provisions of Law No. CXII of 2011 regarding the right to informational self-determination and freedom of information (hereinafter: "Data Protection Law").

Personal data is processed by the Company only for predetermined purposes, for the period necessary, and for the exercise of rights and fulfillment of obligations. The Company processes only those personal data that are indispensable for achieving the data processing purpose and are adequate for achieving the objective.

Any statement of rights containing consent given by a minor under the age of sixteen is valid only with the consent or subsequent approval of the legal representative.

In cases where the Company uses the collected data for purposes other than the original purpose of collection, the person concerned will be informed of this fact and their prior, explicit consent will be requested, and the possibility for the person to forbid the use of their data will be ensured.

During the processing of data, the personal data collected by the Company may be accessed only by employees or contractual partners of the Company who have specific tasks related to data processing.

II. Definition of Terms

Data Subject: any identified or identifiable natural person, directly or indirectly, through the use of personal data.

Personal Data: data that can be associated with the data subject—especially name, personal identification number, and one or more physical, physiological, psychological, economic, cultural, or social characteristics specific to the data subject— as well as any conclusions about the data subject that can be drawn from the data.

Special Data: personal data relating to racial or ethnic origin, nationality, political opinions or party membership, religious or ideological beliefs, membership in organizations promoting specific interests, sexual life, as well as personal data concerning health, pathological dependencies, and criminal record data.

Consent: a voluntary and unequivocal manifestation of the will of the data subject, based on adequate information, and which clearly expresses their agreement to the processing of their data, either in full or limited to specific operations.

Objection: a declaration by the data subject opposing the processing of their personal data and requesting its cessation or deletion.

Data Controller: a natural or legal person, or an organization without legal personality, responsible for determining the purposes and means of processing data, making decisions regarding the processing of data (including decisions about the methods used), and implementing these decisions independently or through a data processor with whom a contract has been signed.

Data Processing: any operation or set of operations performed on data, especially the collection, recording, organization, storage, modification, use, retrieval, transmission, publication, coordination, or interconnection, blocking, deletion, or destruction, as well as preventing further use, taking photographs, audio or video recordings, or recording physical characteristics (e.g., fingerprints, palm prints, DNA samples, iris photographs) that allow the identification of a person.

Data Processor: a natural or legal person, or an organization without legal personality, that processes data on behalf of the data controller under a contract—including contracts concluded according to legal provisions.

Third Party: a natural or legal person, or an organization without legal personality, other than the data subject, data controller, or data processor.

Confidentiality Incident: unlawful processing of personal data, especially unauthorized access, alteration, transmission, disclosure, deletion, destruction, as well as accidental destruction and damage.

III. Data Management

III.1. Hotel Services Usage

In the context of hotel services, the processing of any personal data is based on the voluntary consent of the data subject and aims to ensure the provision of services and maintain contact. With the exceptions mentioned in certain subsections, the personal data mentioned in this paragraph are retained by the Company for the period required by fiscal and accounting regulations, after which they are deleted.

III.1.1. Room Reservation

When making a room reservation online, in person (on paper), or by phone, the Company may request/collect the following data from Clients:

- Title (optional)
- First name
- Last name
- Address (street, number, city, postal code, country)
- Email address
- Mobile phone number
- Type of bank/credit card
- Card number
- Cardholder's name
- Card expiration date
- CVC/CVV code of the bank/credit card (CVC2 for MasterCard, CVV2 for Visa International)

Additional information about data management regarding room reservations can be requested by sending a message to: contact@harmonia-mundi.ro.

III.1.2. Registration Form

When using certain hotel services, the Client will fill out a Registration Form, in which they give consent for the personal data they are required to provide under applicable law (such as regulations

regarding foreigners and the hotel tax), to be managed by the Company for a period of time during which competent authorities may verify compliance with the legal obligations. These data are:

- Name and surname
- Address
- Citizenship (for statistical purposes only, and cannot be associated with the data subject)
- Place and date of birth

For citizens from third countries, additional data may be required as stipulated by law, such as passport or travel document identification data. Providing the required data is a condition for using hotel services. By signing the Registration Form, the Client consents to the processing and archiving of their personal data for the period indicated above, as proof of contract fulfillment and for the execution of potential claims.

Details regarding the processing of personal data provided in the registration form can be obtained by written request sent to: contact@harmonia-mundi.ro.

III.1.3. Bank Card Data

The Company will use bank card, credit card, and bank account data collected during room reservations only to the extent and for the period necessary to exercise its rights and fulfill its obligations. These data are managed by the Company's banking partners. For additional details, please visit our banking partner's website: www.otpbank.ro.

For further information regarding bank card data processed by certain subsystems of our company, you can send a written request to: contact@harmonia-mundi.ro.

III.2. Contact

The Company may be contacted by anyone via email. Messages received are processed by the Company until the request/question is resolved, and once resolved, the emails are archived and stored for five (5) years.

IV. Data Security

IV.1. Data Security

The Company handles personal data confidentially and does not allow unauthorized persons to access it. The Company protects personal data primarily against unauthorized access, alteration, transmission, disclosure, deletion, or destruction, as well as accidental damage or destruction and inaccessibility due to technological changes. The Company takes all necessary technical measures to ensure the protection of personal data security.

IV.2. Data Transmission

The Company reserves the right to transmit personal data it manages to competent authorities and judicial bodies, in accordance with their requests, even without the explicit consent of the data subject.

V. Rights of the Data Subject

Under EU GDPR 679/2016, as a data subject, you have the following rights:

- The right of access
- The right to rectification of inaccurate personal data
- The right to erasure of data ("right to be forgotten")

- The right to restriction of processing
- The right to be notified about rectification, erasure, or restriction of processing
- The right to data portability
- The right to object to the processing of personal data
- The right not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects concerning the data subject or similarly significantly affect them.