HOTEL INDIGO KRAKOW WAWEL CASTLE
PRIVACY POLICY

Commitment to data protection and privacy policy

The protection of personal data and the privacy of Our Guests, Contractors, and website Users is of key importance to the HOTEL, due to the nature of the services we provide.
For the purposes of this Privacy Policy, a Guest or User means a former, current, or potential Guest or User of a product or service offered by the HOTEL, visiting the websites: www.indigokrakow-wawel.pl, www.heritageandhip.pl, www.indigokrakow-wawel.com, www.heritageandhip.com, www.heritageandhip.pl, www.heritagehip.pl , www.heritagehip.com

Principles

We use personal data in a lawful, fair, appropriate, and transparent manner.
We collect only the necessary personal data – always for lawful purposes.
We store only necessary data – no longer than required.
We protect personal data using appropriate security measures.

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1. GENERAL PROVISIONS

1.1. The following Privacy Policy is for informational purposes, which means that it does not constitute an obligation for Service Recipients, Guests, Contractors, Visitors, or Job Applicants. It outlines the principles of data processing by the Controller, including the legal basis, purposes, scope of data processing, and the rights of data subjects.
The Controller of personal data collected via the Websites: www.howellestates.com.pl, www.stradomska25.com.pl, www.rondooffice.pl, www.regalpark.pl
Social media (Instagram, Facebook, LinkedIn, TikTok) and directly from Guests visiting our Hotel is: HOWELL ESTATES Sp. z o.o. with its registered office in Krakow (hereinafter: Hotel).

Hereinafter „Administator" or „HOTEL"
- Address: ul. Gromadzka 46, 30-719 Krakow,
- Tel. (+48.12 335 78 00)

1.2. A Data Protection Officer (DPO), Ms. Dorota Gross, has been appointed, who can be contacted regarding your data and related matters via: iod[at]indigokrakow-wawel.pl or in writing to the address of our registered office, indicated in point 1.
1.3. Use of the Controller`s websites is voluntary. Likewise, it applies to the providing data necessary for the conclusion of Contacts, including contracts for the provision of services within the scope of the Controller's activities. In this case, the provision of personal data constitutes a contractual requirement, and if the data subject wishes to conclude such an agreement with the Controller, they are obliged to provide the required data. Generally applicable legal provisions impose an obligation on the Controller to process personal data (e.g. data processing for the purposes of keeping tax or accounting records), and failure to provide such data will prevent the Controller from fulfilling these legal obligations.
1.4. The Controller exercises due diligence to protect the interests of individuals whose personal data is being processed. In particular, the Controller is responsible for ensuring that the data collected is:

(1) processed lawfully;
(2) collected for specified, legitimate purposes and not further processed in a manner incompatible with those purposes;
(3) factually accurate and adequate in relation to the purposes for which it is processed;
(4) stored in a form which permits the identification of data subjects for no longer than is necessary to achieve the purposes of the processing; and
(5) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, by means of appropriate technical or organisational measures.

1.5. Taking into account the nature, scope, context, and purposes of the processing, as well as the risk of infringement of the rights or freedoms of natural persons—of varying likelihood and severity—the Controller implements appropriate technical and organisational measures to ensure that the processing is carried out in accordance with this Regulation and to be able to demonstrate such compliance. These measures are reviewed and updated as necessary. The Controller applies technical measures to prevent unauthorised persons from gaining access to or modifying personal data transmitted electronically.

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2. LEGAL BASIS FOR PROCESSING AND DURATION OF PROCESSING

2.1. Personal data processing activities include:

- registration and guest service,
- management of systems and services,
- data verification,
- pursuit of claims arising from the activities conducted by the Controller,
- securing information in case of a legal need to establish facts,
- fulfilment of tax obligations, including accounting,
- provision of marketing services,
- ensuring the highest quality of services provided,
- video surveillance (CCTV),
- recruitment purposes,
- correspondence handling.

2.2. In each case, the purpose, legal basis, duration, scope, and recipients of the personal data processed by the HOTEL depend on the actions undertaken by you in relation to the services or activities listed below.

Purpose of data processing	Legal basis and data retention period	Maximum Scope of Processed Data
GUEST REGISTRATION	Art. 6 paragraph. 1 point. b) GDPR – AGREEMENT/ ACCEPTANCE OF HOTEL REGULATIONS based on the Civil Code. Data is retained for a period of 6 years.	REGISTRATION FORM: Name, surname, residential address, phone number, email address.
SERVICE PROVISION	Art. 6 paragraph. 1 point. b) GDPR – AGREEMENT based on the Civil Code. Data is retained for a period of 6 years.	AGREEMENT/ORDER: Name and surname or business name of the contractor, address, contact details.
SETTLEMENT OF SERVICES	Art. 6 paragraph. 1 point. c) GDPR – LEGAL OBLIGATION based on accounting regulations. Data is retained for a period of 6 years.	INVOICES AND RECEIPTS: Name and surname, address, company name/registered office, tax identification number, amount and date of issue.
MARKETING	Art. 6 paragraph. 1 point. f) - LEGITIMATE INTEREST Data is retained until claims related to marketing activities expire.	EMAIL: IP address, name, surname, phone number, email address.
ASSERTING RIGHTS	Art. 6 paragraph. 1 point. f) GDPR - LEGITIMATE INTEREST Data is retained until the rights or claims related to the provision of services expire.	DOCUMENTATION: Data necessary to conduct legal proceedings.
GUEST FEEDBACK	Art. 6 paragraph. 1 point. f) GDPR - LEGITIMATE INTEREST Data is retained until an objection to the processing of such data is raised.	SURVEY: Name, surname, phone number, email address.
VIDEO SURVEILLANCE	Art. 6 paragraph. 1 point. f) GDPR - LEGITIMATE INTEREST CCTV recordings are retained for a maximum of 30 days.	IMAGE RECORDING: Data from CCTV monitoring on HOTEL premises and in front of the building– area of 25 Stradomska Str. and 8 Św. Agnieszki Str.
CORRESPONDENCE	Art. 6 paragraph. 1 point. f) GDPR - LEGITIMATE INTEREST Data originating from correspondence is retained for a period of 10 years.	EMAIL, LETTER: Identification data, name and surname, postal address, email address, IP address, and data contained in the correspondence.
RECRUITMENT	Art. 6 paragraph. 1 point. a) GDPR - CONSENT Data provided directly by the candidate or via a job portal is retained for a period of 2 years.	Cover letter, CV: Identification data, name and surname, postal address, email address, data concerning professional experience and skills.

- After the expiry of the aforementioned periods, the data is permanently deleted or anonymised.

2.3. Legal provisions:

The processing of your personal data is in compliance with the law, including with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). Official text of the GDPR Regulation: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32016R0679

Acts and Regulations:

- The Act on hotel services and services of tour leaders and tourist guides of 29 August 1997;
- Act on Provision of Electronic Services of 18 July 2002;
- The Accounting Act of 29 September 1994;
- The Civil Code of 23 April 1964;
- The Polish Value Added Tax Act of 11 March, 2004;
- The Telecommunications Act of 16 July 2004;
- The Consumer Rights Act of 30 May 2014;
- The Personal Data Protection Act of 10 May 2018;
- Standards for the protection of minors, i.e. the so-called "Kamilka Act" of 15 February 2024;
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

Internal Regulations:

- - Hotel and car park regulations;
- - Procedure for the protection of minors;

3. RECEPIENTS OF DATA

3.1. The recipients of the data are entities acting on behalf of the Hotel under separate agreements:

- providers of technical and organisational solutions supporting the provision of services / Hotel management (including ICT service providers, courier/postal and logistics services),
- providers of transport services, as well as travel agencies and tour operators,
- providers of legal and advisory services,
- The recipient of data related to Guest feedback and satisfaction surveys is
  InterContinental Hotels Group PLC
  The main GDPR supervisory authority headquarters in the EU:
  InterContinental Hotels Group
  Attn: Privacy Office
  Thurn-und-Taxis-Platz 6
  60313 Frankfurt am Main
  Germany

3.2. The recipients of the data are entities acting on behalf of the Hotel under separate agreements:

- For reservation purposes – InterContinental Hotels Group. The Privacy Statement is available here: https://www.ihg.com/content/gb/en/customer-care/privacy_statement
- Data recipients for the purpose of leaving reviews about the Hotel is also Google LLC, Booking.com, Expedia, Tripadvisor and other websites where it is possible to make a reservation at the Hotel – all of which are separate data controllers.
- Entities authorized to receive data under applicable laws.

3.3. Guest personal data will be transferred outside the European Economic Area (EEA).

Pursuant to Article 45 of Regulation (EU) 2016/679 on the Protection of Personal Data (GDPR), the European Commission assesses the adequacy of the level of data protection in a third country by taking into account, among other things, the rule of law, respect for human rights in the third country, the existence of an independent supervisory authority, and the country's international commitments, particularly in the area of personal data protection.
Once the European Commission determines that an adequate level of protection is ensured, it

may adopt an adequacy decision, under which data transfers to that country may take place without the need for specific authorization.

The European Commission has issued adequacy decisions recognising an adequate level of data protection for the following countries and autonomous territories: Andorra, Argentina, Canada (for commercial organisations), the Faroe Islands, Guernsey, Israel, the Isle of Man, Japan, Jersey, New Zealand, Switzerland, Uruguay, and the United Kingdom. The adequacy decision procedure for South Korea is currently in progress.

- InterContinental Hotels Group is an international company that provides services worldwide. Details regarding data processing are described above in section 3.
- The entity providing guest satisfaction survey services is registered in Israel.

4. RIGHTS OF DATA SUBJECTS

4.1. The data subject has the right to request from the Controller access to their personal data, rectification, erasure, or restriction of processing; the right to object to processing; the right to data portability; and the right to withdraw consent at any time.
4.2. The provision of personal data is mandatory when required by law (e.g. guest registration); refusal to provide such data may result in the inability to deliver the service. In all other cases, the provision of data is voluntary.
4.3. Right to lodge a complaint with a supervisory authority – a person whose data is processed by the Controller has the right to lodge a complaint with a supervisory authority in the manner and under the procedures set out in the provisions of the GDPR and Polish law, in particular the Personal Data Protection Act. The supervisory authority in Poland is the President of the Personal Data Protection Office.

5. SOCIAL MEDIA

5.1. Information on the processing of personal data in the context of social media activities. With regard to the use of social media, the Controller informs that personal data is processed, in particular when a Visitor: (1) comments on or shares a post published by the Controller; (2) sends a message; (3) posts a review or follows the Controller's profile.
5.2. Personal data will be processed when necessary for the purposes of the Controller's legitimate interests, which include: 1) direct marketing; 2) conducting measurements, statistics, and analyses (e.g. to customize content to the preferences and interests of Users in general); 3) ensuring security, functionality, and stability; 4) detecting abuses related to the use of websites; 5) asserting or defending against claims, and defending against the liability of collective entities for acts prohibited prohibited and punishable by law.
5.3. The Controller may process personal data for marketing purposes in accordance with its legitimate interest, until an objection to such processing is raised. The data is always provided voluntarily, in the form of a user identifier, the content of comments or messages, and social media profile photos of Users.
5.4. Personal data collected by Meta (Facebook, Messenger, Instagram), X (Formerly Twitter), LinkedIn – such as post history and activity logs – is retained in accordance with the retention rules specified in the terms of service of those platforms.
5.5. Data profiling.
Personal data may be subject to profiling in the context of website management. This involves automated analysis or prediction of an individual's behaviour on the website. Details are provided in the section COOKIES AND ANALYTICS.

6. COOKIES AND ANALYTICS

6.1. Cookies are small text files containing information, which are sent by a server and stored on the device of a person visiting the website (e.g. on a computer hard drive, laptop, or memory card of a smartphone – depending on the device used by the visitor to access our website).
Detailed information about cookies, as well as their origin and history, can be found, among others, here: http://pl.wikipedia.org/wiki/Ciasteczko.
6.2. The Controller may process data contained in cookies when visitors use the website for the following purposes:
- Remembering data entered into contact forms;

- Customising the website content to the individual preferences of the User (e.g. regarding colours, font size, or page layout) and optimising the use of the website;
- Conducting anonymous statistics presenting how the website is used.

6.3. By default, most web browsers available on the market automatically accept the storage of cookies. However, users can define the conditions for the use of cookies through their individual browser settings. This means that it is possible, for example, to partially restrict (e.g. temporarily) or completely disable the ability to store cookies.

6.4. Detailed information on how to change cookie settings and delete cookies manually in the most popular web browsers is available in browser's help section.

6.5. The Controller may use Google Analytics and Universal Analytics services provided by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). These services help the Controller compile statistics and analyse traffic on the websites. The data collected through the above-mentioned services is processed to generate statistics that support website administration and traffic analysis. This data is aggregated in nature.

6.6. It is possible for an individual to easily block the sharing of information about their activity on the Online Store website with Google Analytics – for example, by installing a browser add-on provided by Google Ireland Ltd., available here: https://tools.google.com/dlpage/gaoptout?hl=en-GB

7. FINAL PROVISIONS

7.1. The websites https://indigokrakow-wawel.pl/en/, www.heritageandhip.pl may contain links to other websites. The Controller encourages users to review the privacy policy applicable on those external websites once they are redirected. This privacy policy applies only to the Controller's and the HOTEL's websites.

7.2. Automated decision-making by the HOTEL, including profiling, is based on the creation of Guest preference models in order to customise services to individual needs and to prepare relevant marketing content. The Controller informs that data provided in the registration card is not used for profiling purposes.

7.3. However, Guests always have the right not to be subject to a decision based solely on automated processing, including profiling, and may request human intervention. To do so, please contact the Hotel directly.

7.4. Controller's Statement

The HOTEL declares and assures that the organisational and technical measures it applies to ensure the security of personal data processing meet the requirements specified in the GDPR, in particular with Article 32 of the Regulation.
To exercise your rights or to obtain information related to data protection, please contact via the following email address: info@indigokrakow-wawel.pl
Detailed information is also available at the HOTEL reception desk.