

INFORMATION ON PERSONAL DATA PROCESSING

The company SNĚŽNÍK, a.s., Company ID No.: 26979136, registered office: Velká Morava 79, Dolní Morava, 561 69, registered in the Commercial Register kept by the Regional Court in Hradec Králové, Section B, File 2886 (hereinafter the “Controller” or “SNĚŽNÍK, a.s.”), protects all processed personal data as strictly confidential and handles them in accordance with the requirements of 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 and on the free movement of such data, repealing Directive 95/46/EC (hereinafter the “Regulation” or “GDPR”).

SNĚŽNÍK, a.s. is, within the meaning of the GDPR, the controller of your personal data, i.e. it processes, collects, stores or otherwise uses your personal data in the course of carrying out its business activities.

This document provides information on the purposes for which the Controller processes your personal data, what types and categories of personal data are processed (i.e. whose and which data are processed), and on which legal basis your personal data are processed. This document also explains your rights in relation to the processing of your personal data and the ways in which you may exercise them towards the Controller.

Controller’s contact details:

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SNĚŽNÍK, a.s. processes your personal data in particular:

- a) for the performance of contractual relationships with the data subject when providing services, i.e. negotiating the conclusion or amendment of a contract, mutual fulfilment of rights and obligations under the contract, as well as the protection of the Controller’s rights and legitimate interests (especially securing and exercising legal claims arising from the contract). Identification and contact details are therefore necessary for the provision of a product, service, professional assistance or customer support;
- b) for internal purposes, in particular the protection of its rights and legitimate interests, especially in the area of monitoring service quality, optimising provided services and assessing potential risks;
- c) for the specific purposes set out in Articles II to VII below.

I.

DEFINITION OF BASIC TERMS

1. Personal Data

Personal data means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2. Data Subject

For the purposes of this information, a data subject is any natural person whose personal data are processed by the Controller in connection with its business activities or other activities carried out by the Controller.

3. Processing of Personal Data

Processing means any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

4. Controller

A controller is a natural or legal person, public authority, agency or other body which determines the purposes and means of the processing of personal data, either alone or jointly with others. For the purposes of this document, the Controller is SNĚŽNÍK, a.s., Company ID No.: 26979136, with registered office at Velká Morava 79, Dolní Morava, 561 69, registered in the Commercial Register kept by the Regional Court in Hradec Králové, Section B, File 2886.

5. Processor

A processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller, on the basis of a data processing agreement pursuant to Article 28 GDPR.

6. Recipient

A recipient is a natural or legal person, public authority, agency or another body to which the personal data are disclosed, whether a third party or not. Public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law are not regarded as recipients; the processing of such data by those public authorities must comply with applicable data protection rules according to the purposes of the processing.

7. Legal Bases for Processing

The Controller processes personal data only on the following legal bases:

- a) the data subject has given consent for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is party or for taking steps prior to entering into a contract at the request of the data subject;
- c) processing is necessary for compliance with a legal obligation to which the Controller is subject;
- d) processing is necessary for the purposes of the legitimate interests pursued by the Controller or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject that require protection of personal data, in particular where the data subject is a child.

8. Principles of Personal Data Processing

- a) Lawfulness – the Controller processes personal data only in a lawful manner and in a way that does not infringe the rights of data subjects.
- b) Purpose limitation – the Controller processes personal data only for specified, explicit and legitimate purposes. Further processing for archiving, scientific or statistical purposes is permitted provided appropriate safeguards are applied.
- c) Data minimisation – the Controller only processes personal data necessary for its activities.
- d) Accuracy – the Controller ensures that data are accurate, correct and updated as necessary.
- e) Storage limitation – the Controller retains personal data only for as long as necessary or required by law.
- f) Minimisation of retention – personal data are kept in a form that permits identification of data subjects for no longer than necessary.
- g) Integrity and confidentiality – processing must ensure appropriate security of personal data, including protection against unauthorised access, unlawful processing, accidental loss, destruction or damage.
- h) Accountability – the Controller is responsible for and must be able to demonstrate compliance with the GDPR principles.

9. Identification Data

Including in particular:

- name
- surname
- date of birth
- personal identification number
- passport or ID card number
- other data listed in specific privacy notices, e.g. residence address, city, postal code

10. Contact Data

Including in particular:

- address
- phone number
- e-mail
- other data listed in specific privacy notices

11. Descriptive Data

Including in particular:

- visitor behaviour
- attempts to misuse services
- bank details + payment card number
- other data listed in specific privacy notices, e.g. WTP card number

12. Data Concerning Health

- name and surname
- date and time of an incident (e.g. accident)
- location of the incident
- occupational health assessment
- other data listed in specific privacy notices

13. Special Categories of Personal Data

The Controller does not process special categories of personal data within the meaning of Article 9 GDPR (racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, data concerning health, sex life, sexual orientation etc.), except for data concerning health in justified cases (e.g. accident in the area).

II.

INFORMATION ON THE PROCESSING OF CUSTOMERS' PERSONAL DATA

This section relates to the processing of personal data of the Controller's customers. When processing personal data of its customers, SNĚŽNÍK, a.s. acts as the controller. The following information provides an overview of how customer personal data are processed.

1. Categories of Personal Data

The Controller processes the following personal data concerning its customers:

- Address and identification data, e.g. name, surname, permanent residence address, mailing address, e-mail, phone number, personal identification number, ID card number, and where applicable, company address represented by the customer, business e-mail, business phone number, family relationship.
- Personal data not obtained directly from the data subjects, e.g. CCTV security

camera recordings or panoramic camera recordings used to inform the public; reference and control photographs of ski pass holders or similar products.

2. Purposes of Processing

The purposes for which the Controller processes personal data include:

- Performance of a contract – the primary purpose is to manage contractual relationships with customers as data subjects, including negotiating contract conclusion or amendments, and mutual fulfilment of rights and obligations. This includes, in particular, membership in the “Resort Card” loyalty programme (detailed below), access to the mountain resort area and use of cableways.
- Customer administration – the Controller keeps records of services provided to customers. Based on these records, it evaluates business strategies and adjusts its customer offers.
- Provision of accommodation services – the Controller records the personal data of guests accommodated in its facilities in order to fulfil legal obligations related to the provision of accommodation services.
- Ski school – the Controller records personal data of ski school participants. The legal basis is performance of a contract and the Controller’s legitimate interest.
- Operational safety and prevention of service misuse – the Controller monitors entrances, movement and activities within its premises to ensure safety, protect its property and prevent misuse of its services. The legal basis is the Controller’s legitimate interest.
- Rental of ski and other sports equipment – the Controller records personal data of customers who rent sports equipment (skis, bicycles etc.). The legal basis is performance of a contract. For legitimate interest reasons, the Controller may require the customer to present an ID card.
- Direct marketing – the Controller processes customer personal data for direct marketing purposes, such as sending newsletters or commercial communications, from which customers may unsubscribe at any time. The legal basis is the Controller’s legitimate interest.
- Other purposes – the Controller processes customer data to comply with legal obligations related to tax and accounting duties. It may also process data for resolving disputes, complaints or offences. The legal basis is legal obligation or legitimate interest, e.g. processing reference and control photographs for property protection.

If the customer registers in the “Resort Card” loyalty system (online, at a self-service terminal, at the ticket office, or otherwise), we also carry out the following processing:

A. Based on performance of a contract

If a customer creates an account on our website, we process their identification and contact details (e-mail/login, name, surname, city, country, postal code, date of birth, WTP card number and whether they have a previously issued Resort Card), their profile settings and data about orders, purchase history and the Discount Centre section (if purchases are made via the account).

This processing is based on contract performance (without consent) and is necessary to maintain the customer's account. The contract is established by registration.

Personal data are used for the period described below; customers may cancel their registration at any time.

B. Based on our legitimate interest

If a customer registers, in addition to the above, we process data regarding the customer's purchasing behaviour and behaviour within the profile (history, use of promo codes etc.) or behaviour when reading our messages. This processing, based on our legitimate interest (without consent), aims to:

- obtain information enabling improvement of our services for customers, including assessing satisfaction and use of services;
- fulfil rights and obligations towards registered customers;
- provide personalised offers and targeted direct marketing, possibly linked to previous behaviour and preferences, sent via e-mail, text message or other electronic means, or displayed on our website. Our legitimate interest is efficient promotion of our products and services.

In order to be able to prepare a tailor-made offer for the customer, we manually (i.e. not automatically) analyse the above-mentioned data and derive additional data from them, which we use for this purpose. Derived data means personal data derived from the customer's registration, data on services purchased and orders, and data on the customer's behaviour as described above; in particular, this includes data about your gender, age, financial situation, purchasing behaviour and relationship to various services. We may also use data on the customer's behaviour on the website that we obtained before they registered (e.g. as a result of holding an existing Resort Card or otherwise), and we may collect data on their behaviour on the website even if they do not log in (for example, when we identify the customer using a cookie). Based on this data, we may also divide registered customers, in a non-automated way, into different groups, with each group receiving its own specific offer. This function depends on the privacy settings of your browser. For this purpose, we use personal data for the duration of the registration, which you may cancel at any time.

After registration, the customer may unsubscribe from commercial communications in their personal profile at any time, as well as via the link in the footer of each communication. Deregistration from the Resort Card loyalty programme, i.e. cancellation of the registration, can only be done by the customer sending a notice

from their registered e-mail address to the Controller's e-mail: resort@dolnimorava.cz; the Controller will erase the customer's data from the system. The customer's rights are set out in Article VIII of this Information. These personal data will be processed for the duration of the registration and subsequently for the period stipulated for the operator by individual legal regulations or for the period required by the operator's legitimate interest (i.e. 3 years from the conclusion and fulfilment of the last concluded contract), on the basis of the Controller's legitimate interest.

The Controller implements appropriate technical and organisational measures (e.g. limiting the number of persons who have access to personal data in the registration) to ensure a level of security appropriate to the risk to personal data and to minimise the risk of accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, or other misuse of personal data.

3. Recipients of Personal Data

The Controller may or must disclose personal data:

- to processors who perform full or partial processing of personal data for the Controller on the basis of an appropriate contract (e.g. the provider of the CRM system for the loyalty programme and e-shop Skiwise GmbH, hosting providers);
- to state authorities or public bodies in cases where the disclosure of personal data to the Controller is required by law – in particular public administration authorities, courts, law enforcement authorities, supervisory authorities, enforcement officers, notaries, insolvency administrators, etc.;
- to other entities where necessary for the protection of the Controller's rights, such as insurance companies, the legal representative of SNĚŽNÍK, a.s., its employees and cooperating persons, courts, judicial enforcement officers, auctioneers; the scope of personal data disclosed is limited to what is necessary for successful enforcement of a claim;
- to other entities, with your consent.

4. Period and Place of Data Storage

- Personal data are processed only for the necessary period, which is individual for each contract or legitimate interest of the Controller with regard to the possibility of proper exercise and enforcement of contractual performance. After this period expires, personal data are destroyed or further retained for the period specified in the valid Filing and Disposal Plan issued in accordance with Act No. 499/2004 Coll., on Archiving and Records Management.
- The Controller intends to transfer personal data to a third country (a country outside the EU) or an international organisation. Recipients of personal data in

third countries include providers of cloud or mailing services and social networks.

5. Information

- Provision of the personal data specified in Article II(1) may be necessary for the performance of the contract and for the Controller's legal obligations as a provider of a product or service. If these data are not provided, the Controller may be unable to conclude the relevant contract with the customer.
- In processing your personal data, automated decision-making is carried out on the basis of which acts or decisions may be taken whose content constitutes interference with your rights or legitimate interests.
- In some cases, your personal data may be collected and further processed on the basis of your voluntary consent, which always represents a free, specific, informed and unambiguous expression of your will to the processing of your personal data for the given purpose, and which always includes information on the possibility to withdraw your consent at any time.
- Individual rights of customers arising from the GDPR are set out in Article VIII below.

With regard to potential customers, i.e. persons who have not yet been customers of the Controller or have not registered as customers in the "Resort Card" loyalty programme, their personal data, including for the purpose of sending commercial communications and newsletters, may be processed with their consent.

III.

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF THE CONTROLLER'S EMPLOYEES

This section relates to the processing of personal data of the Controller's employees. When processing the personal data of its employees, SNĚŽNÍK, a.s. acts as the controller. The following information provides an overview of how the Controller processes the personal data of its employees.

1. Categories of Personal Data

The Controller processes the following data:

- Address and identification data used for the clear and unambiguous identification of an employee:
name, surname, date of birth, personal identification number, ID card and driving licence number, home address, passport number for foreign nationals, nationality, personal identification number, address for service of documents, photograph with the employee's consent.

- Data enabling contact with the employee: telephone number and e-mail address.
- Descriptive data: bank account details.
- Data necessary to fulfil tax obligations: marital status (spouse), children.
- Data related to the employee's employment relationship: amount of wage and other payments, information on health status, information on occupational injuries, information on education or completed courses, certificates, previous employment, CCTV recordings, decisions of state authorities, other data with the employee's consent for the purposes of payroll processing including deductions from wages.

2. Categories of Data Subjects

Employees of the Controller in a permanent employment relationship, natural persons employed under agreements to complete a job (DPP) or agreements to perform work (DPČ), and possibly other persons whose personal data are required by law to achieve the given purpose. Personal data are obtained from employees as data subjects.

3. Purposes of Personal Data Processing

The purposes of processing personal data by the Controller are:

- Performance of a contract – employees' personal data are collected and processed in particular for the purpose of fulfilling the rights and obligations of the Controller as an employer in connection with the employment relationship, for payroll accounting, and for paying taxes, fees and mandatory contributions to social, health, accident or other insurance.
- Compliance with legal obligations – such processing is necessary for the performance of the employment contract and for compliance with legal obligations arising in particular from Act No. 262/2006 Coll., the Labour Code, and other applicable regulations, especially in the fields of accounting, taxation, social and health insurance.
- Controller's legitimate interest – the Controller monitors entries, movements and activities within its facilities in order to ensure safety and protect the Controller's property.

4. Recipients of Personal Data

The Controller may or must disclose personal data:

- to processors who carry out full or partial processing of personal data for the Controller on the basis of an appropriate contract;

- to state authorities or public bodies in cases where the disclosure of personal data is required by law – in particular public administration authorities, courts, law enforcement authorities, supervisory authorities, enforcement officers, notaries, insolvency administrators, etc.;
- to other entities where necessary for the protection of the Controller's rights, such as insurance companies, courts, judicial enforcement officers, auctioneers; the scope of personal data disclosed is limited to what is necessary for successful enforcement of a claim;
- to other entities, with your consent.

5. Period and Place of Personal Data Processing

- The Controller will process employees' personal data only for as long as required in each individual case by the relevant legal regulations.
- The Controller intends to transfer personal data to a third country (a country outside the EU) or an international organisation. Recipients of personal data in third countries include providers of cloud or mailing services and social networks.

6. Information

- Provision of the personal data specified in Article III(1) is mandatory and necessary for the performance of the contract and the Controller's legal obligations as an employer. If these data are not provided, the Controller cannot conclude an employment contract or an agreement to complete a job or an agreement to perform work with the employee.
- In processing your personal data, automated decision-making is carried out on the basis of which acts or decisions may be taken whose content constitutes interference with your rights or legitimate interests.
- In some cases, your personal data may be collected and further processed on the basis of your voluntary consent (e.g. your photograph), which always represents a free, specific, informed and unambiguous expression of your will to the processing of your personal data for the given purpose, and which always includes information on the possibility to withdraw your consent at any time.
- Individual rights of employees arising from the GDPR are set out in Article VIII below.

IV.

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF JOB APPLICANTS

This section relates to the processing of personal data of individuals applying for employment with the Controller. When processing the personal data of job applicants, SNĚŽNÍK, a.s. acts as the controller. The following information provides an overview of how the Controller processes the personal data of persons applying for employment with the Controller.

1. Categories of Personal Data

The Controller processes the following data:

- Address and identification data used for the clear and unambiguous identification of the applicant:
name, surname, date of birth, personal identification number, home address, passport number for foreign nationals.
- Data enabling contact with the applicant:
telephone number and e-mail address.
- Data from the applicant's CV and cover letter:
information on education or completed courses, certificates, previous employment, skills, language proficiency, photograph or other information that the applicant chooses to include in their CV or cover letter.
- Other data depending on the nature of the position:
extract from the criminal record, results of professional competence tests or similar tests, references.

2. Categories of Data Subjects

Job applicants with the Controller (persons who have expressed an interest in working for the Controller) whose personal data are required by law to achieve the given purpose. Personal data are obtained from job applicants as data subjects.

3. Purposes of Personal Data Processing

The purposes of processing personal data by the Controller are:

- Negotiation of a contract – job applicants' personal data are collected and processed in particular for the purposes of conducting the selection procedure with the Controller and subsequently for negotiating the conclusion of an employment or similar contract.
- Compliance with legal obligations – such processing is necessary for the performance of the employment contract and for compliance with legal obligations arising in particular from Act No. 262/2006 Coll., the Labour Code, and other applicable regulations. The legal basis is the Controller's legal obligation.

- Controller's legitimate interest – the Controller may process job applicants' personal data for the purposes of resolving possible legal disputes, complaints or submissions. The legal basis is the Controller's legitimate interest.

4. Recipients of Personal Data

The Controller may or must disclose personal data:

- to processors who perform full or partial processing of personal data for the Controller on the basis of an appropriate contract;
- to state authorities or public bodies in cases where the disclosure of personal data is required by law – in particular public administration authorities, courts, law enforcement authorities, supervisory authorities, enforcement officers, notaries, insolvency administrators, etc.;
- to other entities where necessary for the protection of the Controller's rights, such as insurance companies, courts, judicial enforcement officers, auctioneers; the scope of personal data disclosed is limited to what is necessary for successful enforcement of a claim;
- to other entities, and only with your consent.

Period and place of personal data processing

- The Controller will process the personal data of job applicants for a limited period, i.e. in particular for the duration of the selection procedure and subsequently for one year after the end of the selection procedure, on the basis of the Controller's legitimate interest in the event of a dispute between the applicant and the Controller. The Controller may process a job applicant's personal data for a longer period after the end of the selection procedure if the applicant has given consent to such processing, or for as long as required in individual cases by the relevant legal regulations.
- The Controller does not intend to transfer personal data to a third country (a country outside the EU) or an international organisation. Recipients of personal data in third countries are providers of cloud or mailing services and social networks.

6. Information

- Provision of the personal data specified in Article IV(1) is mandatory and necessary for carrying out the selection procedure and subsequent negotiations on the conclusion of an employment or similar contract. If such data are not provided, the Controller cannot conduct the selection procedure with the applicant or negotiate the conclusion of an employment or similar contract (agreement to complete a job or agreement to perform work).

- In processing your personal data, no automated decision-making is carried out on the basis of which acts or decisions would be taken whose content would constitute interference with your rights or legitimate interests.
 - In some cases, your personal data may be collected and further processed on the basis of your voluntary consent, which always represents a free, specific, informed and unambiguous expression of your will to the processing of your personal data for the given purpose, and which always includes information on the possibility to withdraw your consent at any time.
 - Individual rights of job applicants arising from the GDPR are set out in Article VIII below.
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V.

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF SUPPLIERS AND OTHER PARTNERS OF THE CONTROLLER

This section relates to the processing of personal data of suppliers, clients or business partners (hereinafter collectively the “Partner”).

1. Categories of Personal Data

The Controller processes the following data of Partners:

- Address and identification data used for the clear and unambiguous identification of the Partner:
name, surname, address, job title, publicly available identification data of a legal entity.
- Data enabling contact with the Partner:
telephone number and e-mail address.
- Other data required by law in specific cases:
ID card or passport number, personal identification number, date of birth.

2. Categories of Data Subjects

- Contractual or other Partners of the Controller, in particular suppliers, business partners and clients, whose personal data are required by law to achieve the given purpose (performance of a contract, provision of services, etc.).
Personal data are obtained from Partners as data subjects.

3. Purposes of Personal Data Processing

The purposes of processing personal data by the Controller are:

- Negotiation and performance of a contract – Partners' personal data are collected and further processed in particular for the purpose of negotiating the conclusion of a contract and for the performance of the relevant contract.
- Compliance with legal obligations – this processing is necessary for compliance with legal obligations arising in particular from legislation relating to anti-money laundering, prevention, monitoring and detection of fraud and similar acts. The legal basis is the Controller's legal obligation.
- Controller's legitimate interest – the personal data of a job applicant may be processed by the Controller for the purpose of resolving any legal disputes, complaints or submissions. The legal basis is the Controller's legitimate interest.

4. Recipients of Personal Data

The Controller may or must disclose personal data:

- to processors who perform full or partial processing of personal data for the Controller on the basis of an appropriate contract;
- to state authorities or public bodies in cases where the disclosure of personal data is required by law – in particular public administration authorities, courts, law enforcement authorities, supervisory authorities, enforcement officers, notaries, insolvency administrators, etc.;
- to other entities where necessary for the protection of the Controller's rights, such as insurance companies, courts, judicial enforcement officers, auctioneers; the scope of personal data disclosed is limited to what is necessary for successful enforcement of a claim;
- to other entities, and only with your consent.

5. Period and Place of Personal Data Processing

- The Controller will process Partners' personal data for as long as necessary to achieve the purpose of processing, and subsequently for the period imposed on the Controller by specific legal regulations or for the period required by the Controller's legitimate interest.
- The Controller intends to transfer personal data to a third country (a country outside the EU) or an international organisation. Recipients of personal data in third countries include providers of cloud or mailing services and social networks.

6. Information

- Provision of the personal data specified in Article V(1) is mandatory and necessary for the purpose of negotiating the conclusion of a contract. If such

data are not provided, the Controller cannot negotiate the conclusion of a contract with the Partner or provide performance under the relevant contract.

- In processing your personal data, automated decision-making is carried out on the basis of which acts or decisions may be taken whose content constitutes interference with your rights or legitimate interests.
 - In some cases, your personal data may be collected and further processed on the basis of your voluntary consent, which always represents a free, specific, informed and unambiguous expression of your will to the processing of your personal data for the given purpose, and which always includes information on the possibility to withdraw your consent at any time.
 - Individual rights of Partners arising from the GDPR are set out in Article VIII below.
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VI.

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF SHAREHOLDERS (PARTNERS) AND MEMBERS OF THE STATUTORY BODIES OF THE CONTROLLER

This section relates to the processing of personal data of shareholders, partners or members of the statutory bodies of the Controller.

1. Categories of Personal Data

The Controller processes the following data:

- Address and identification data used for the clear and unambiguous identification of the person:
name, surname, address, ID card or other ID document number, date of birth, personal identification number.
- Data enabling contact:
telephone number and e-mail address.
- Descriptive data:
bank account details.
- Other data:
marital status, children, job title, powers and responsibilities, type of shares, type and amount of interests, the content of contractual relationships, articles of association, etc., exercise of shareholder/partner rights, participation in voting at general meetings, amount of remuneration, bonuses, rewards and entitlements, CCTV recordings.

2. Purposes of Personal Data Processing

The purposes of processing personal data by the Controller are:

- Performance of a contract – personal data of shareholders/partners are collected and processed in particular for the purpose of fulfilling the rights and obligations of the Controller associated with the participation of the shareholder/partner in the company.
- Compliance with legal obligations – personal data are processed in order to fulfil tax and other similar obligations, in particular payroll accounting, payment of taxes and fees, and mandatory contributions to social, health, accident or other insurance. Such processing is necessary for compliance with legal obligations arising in particular from legislation relating to anti-money laundering, prevention, monitoring and detection of fraud and similar acts. The legal basis is the Controller's legal obligation.
- Compliance with legal obligations associated with the Controller's activities – personal data are processed in order to keep records of all meetings, general meetings, votes, exercise of rights, etc. The legal basis is compliance with a legal obligation.
- Controller's legitimate interest – the Controller monitors entries, movements and activities within its facilities in order to ensure safety and protect the Controller's property.

3. Recipients of Personal Data

The Controller may or must disclose personal data:

- to processors who perform full or partial processing of personal data for the Controller on the basis of an appropriate contract;
- to state authorities or public bodies in cases where the disclosure of personal data is required by law – in particular public administration authorities, courts, law enforcement authorities, supervisory authorities, enforcement officers, notaries, insolvency administrators, etc.;
- to other entities where necessary for the protection of the Controller's rights, such as insurance companies, courts, judicial enforcement officers, auctioneers; the scope of personal data disclosed is limited to what is necessary for successful enforcement of a claim;
- to other entities, and only with your consent.

4. Period and Place of Personal Data Processing

- The Controller will process the personal data of shareholders/partners and members of the statutory bodies only for as long as necessary to fulfil obligations arising from the contract or for the period required in individual cases by the relevant legal regulations.

- The Controller intends to transfer personal data to a third country (a country outside the EU) or an international organisation. Recipients of personal data in third countries include providers of cloud or mailing services and social networks.

5. Information

- Provision of the personal data specified in Article VI(1) is mandatory and necessary for the performance of the contract and the Controller's legal obligations.
- In processing your personal data, automated decision-making is carried out on the basis of which acts or decisions may be taken whose content constitutes interference with your rights or legitimate interests.
- In some cases, your personal data may be collected and further processed on the basis of your voluntary consent, which always represents a free, specific, informed and unambiguous expression of your will to the processing of your personal data for the given purpose, and which always includes information on the possibility to withdraw your consent at any time.
- Individual rights arising from the GDPR are set out in Article VIII below.

VII.

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF VISITORS TO THE CONTROLLER'S WEBSITE

Cookies – cookies are small text files that are stored on a computer, phone or other device when visiting and browsing websites. Cookies are used to store and receive identifiers and other information about computers, phones and other devices from which data subjects access the websites, and help the Controller to provide, protect and improve the services offered.

Cookies in particular:

- serve to enable efficient navigation on the website, personalisation, storage of preferences and generally to improve the user experience of the website;
- make it possible to distinguish whether a particular user has visited the website before or is a new visitor;
- help to display advertising on the website tailored to the interests of a particular user;
- are used to analyse traffic to the Controller's website, in particular via Google Analytics, Google AdSense, Facebook, Strossle, Hotjar, Gemius SA, Exponea, SaS, etc.

1. Types and Purposes of Cookies

The Controller uses the following types of cookies on its websites:

- **Necessary cookies**
Cookies that are strictly necessary to ensure the operation of the website and the Controller's online services. Necessary cookies enable navigation on the website and the use of basic functions. This type of cookie does not collect any personal data of the data subject that would allow identification of the data subject. With the help of these cookies, for example, the Controller's websites remember the data entered by the data subject in an order form, even when navigating between different screens, and remember the goods and services ordered at the moment of transition to the payment interface. If these cookies are disabled, the Controller cannot guarantee full functionality of the website.
- **Performance (analytical) cookies**
These collect information about how the Controller's websites are used. This type of cookie does not collect any personal data of the data subject that would allow identification of the data subject. Performance cookies are primarily used to optimise the operation of the website – e.g. to make advertising more efficient. With the help of performance cookies, the Controller obtains statistical data on website traffic.
These include, in particular, cookies:
Google Analytics – used to measure and evaluate the success of the website.
- **Functional cookies**
These are used to provide services or to remember settings of a user who has visited the Controller's website. With their help, the website remembers, for example, user login details, chosen graphic layout, text size, participation in a survey, etc.
- **Marketing cookies**
These are third-party cookies used by the Controller to provide information about a user's (data subject's) visit to the Controller's website for the purposes of targeted advertising. These include cookies of:

Service	Purpose	Link to terms
Google Adwords	The Controller uses Adwords for ad targeting	Terms of Google Adwords
Sklik	The Controller uses Sklik for ad targeting	Terms of Sklik
Facebook Audience, Pixel	The Controller uses Facebook for ad targeting	Terms of Facebook

Service	Purpose	Link to terms
X (ex Twitter)	The Controller uses X for ad targeting	Terms of X
LinkedIn	The Controller uses LinkedIn for ad targeting	Terms of LinkedIn
Brevo	The Controller uses Brevo to target content on its own website and for e-mail marketing	Terms of Brevo
Studio9	The Controller uses Studio9 tools to target content on its own website and for e-mail marketing	Terms available on MELORI aqua & spa website
Bookolo	The Controller uses Bookolo tools to target content on its own website and for e-mail marketing	–
Smart Hotel	The Controller uses Smart Hotel tools to target content on its own website and for e-mail marketing	–
Epos	The Controller uses Epos tools to target content on its own website and for e-mail marketing	–

2. Categories of Data

- information about visits to the Controller’s website;
- information about IP address;
- information about MAC address of the device;
- information about platform, browser, location, language settings, etc.;
- heatmaps: information about the time spent in certain parts of the website, how the data subject moves on the Controller’s website, customer behaviour on the website, including displayed information, services and links;
- information about behaviour when reading customer messages, in particular the time of opening messages and information about the device on which the customer reads the messages.

3. Legal Basis for the Processing of Personal Data by Means of Cookies

The legal basis for the processing of personal data by means of cookies is negotiation and performance of a contract and the Controller’s legitimate interest.

4. Information

- For cookies that are strictly necessary to ensure the operation of the website, the data subject's consent is not required.
 - The data subject sets in their browser settings whether the browser is to allow the website to store cookies on the end device. Such settings (if cookies are enabled) are considered consent to the processing of personal data in the case of third-party cookies.
 - The data subject may withdraw their consent in the same way as it was given to the Controller, i.e. in the browser settings.
 - The data subject may object to the processing by submitting an objection to the Controller's address or e-mail address.
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VIII.

RIGHTS OF DATA SUBJECTS

The Controller usually does not need the consent of data subjects in order to process their personal data. However, under the GDPR and depending on the legal basis of the processing, data subjects have the following rights:

1. Right of Access

The data subject has the right of access to their personal data pursuant to Article 15 GDPR, in particular the right to obtain from the Controller confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- d) the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the Controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject, or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) any available information as to their source, where the personal data are not collected from the data subject;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4), and, at least in those cases, meaningful information about the

logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

All of the above information is available in this Information on the Processing of Personal Data. The data subject also has the right to request a copy of the personal data the Controller processes about them; additional copies may be subject to a fee.

2. Right to Rectification of Personal Data

In connection with the processing of personal data, the data subject has the right to rectification or erasure of personal data, or restriction of processing, to object to processing and to exercise the right to data portability and other rights under the GDPR.

3. Right to Erasure of Personal Data

If the data subject has given consent to the processing of personal data and there is no other legal ground for the processing within the meaning of the GDPR, in particular performance of a contract, fulfilment of a legal obligation, or the Controller's legitimate interest, or if the Controller processes the data unlawfully or for an unreasonably long period, the data subject has the right to have such data erased.

4. Right to Restriction of Processing

The data subject has the right to obtain from the Controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d) the data subject has objected to processing pursuant to Article 21(1) GDPR pending the verification whether the legitimate grounds of the Controller override those of the data subject.

Where processing has been restricted for any of the above reasons, such personal data, with the exception of storage, shall be processed only with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

5. Right to Data Portability

The data subject has the right to receive the personal data concerning them, which they have provided to the Controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller,

provided that the processing is based on the data subject's consent or on the performance of a contract.

6. Right to Object

The data subject has the right to object to the processing of their personal data where such data are processed on the basis of the Controller's legitimate interest, in particular for direct marketing purposes.

7. Right to Lodge a Complaint

If the data subject has doubts about the manner in which their personal data are processed by the Controller, they have the right to lodge a complaint with the supervisory authority, which is the Office for Personal Data Protection.

8. Place for Exercising Data Subjects' Rights

You may exercise your rights and submit your requests to the above-mentioned Controller:

SNĚŽNÍK, a.s., Company ID No.: 26979136

Address for service: Dolní Morava 58, 561 69 Dolní Morava

Phone: +420 731 605 366

E-mail: sekretariat@dolnimorava.cz

Data box ID: vhggcnv

Your requests will always be duly assessed and handled in accordance with the relevant provisions of the GDPR.

The updated version is valid as of 6. 11. 22025