

## **PROTECTION AND USE OF PERSONAL DATA**

Important! If you do not agree with the Privacy Statement and / or Statement on Cookies, you must stop using our services.

### **PRIVACY STATEMENT**

This Privacy Statement applies to all types of information we collect via the Internet, phone, e-mail. We recommend that you also read the privacy statements of program organizers and accommodation providers.

#### ***What information do we collect?***

When booking the full accommodation, we cannot help you without information, so, when you are using our services, we ask for certain information. This is quite basic information - your name, contact information, names of persons travelling with you, and payment information or payment type. In addition, we also collect data about your computer, which may include the IP address, the browser you are using, and the language settings.

There are also situations when we receive information about you from other people, or situations in which we automatically collect other information.

If you wish to contact us at the telephone number or through other channels available on the website under the tab Contact, or, for example, through social media, or interact with accommodation through our site, we will also collect information from you in such a case. After the stay, guests may be asked to submit a comment and thus help future guests to decide.

If you're browsing on a mobile device, you can enable Adria Holidays to see your current location, or allow access to your contacts - you thus help us to provide you with the best service possible.

You can participate in recommendation programs or other programs, which provide us with personal information. In addition, you can also send us your opinion or, during the use of the Adria Holidays services, ask for help.

If you aren't only making reservations for yourself and are travelling with other guests, the information of whom you provide in the context of reservations, or perform booking on behalf of someone else, we remind you, that you are responsible to ensure that the person or persons whose personal data you provided are aware, that you have done so and accept that Adria Holidays uses their data (as described in this privacy statement).

Even if you do not make reservations with us at the time of your visit to our web sites or applications, we may automatically collect certain data. These include your IP address, date and time of access to our services, hardware, software or a browser that you use, and information about your computer operating system and version of the application, and language settings. We may also collect information about your clicks and viewed pages.

If you are using a mobile device, data that identifies your mobile device, preferences and characteristics of the device, location information, application crashes, and other system activities, may also be collected. When you make a reservation, our system detects, through which assets and

which websites you made the booking or entered on the website and / or applications of Adria Holidays.

Sometimes we may receive information about you from other sources. These include business partners, such as associate partners and other independent third parties. Everything they give us may be combined with data you provide us with. Booking services Adria Holidays are available only through the website of Adria Holidays, but are combined with the services of associated partners, which can be found online. When you use them, the information on booking is provided to our business partners and they then submit this data to us. Service providers also use third parties to allow payment from the person who made a reservation to the accommodation. These service providers share the billing information, so that we can edit your reservation and make sure that everything is running as smoothly as possible.

Another example, when the information is obtained from other sources, is the integration of call services into our platforms, by which we enable contact with the reserved accommodation. In these cases, we obtain metadata about your calls (such as: where did you call from, who you are, and the date and duration of the call). We may also receive information about you when you use certain social media services.

Even accommodation partners can share information about you with Adria Holidays. This can occur if you have questions about an active reservation, if there is any misunderstanding about the reservation, or other communication regarding your booking through Adria Holidays.

### ***Why do we collect your information?***

The main reason for collecting your personal data is successfully arranging your online booking and making sure that we offer the best service and protect your information. Your personal information is also used in cases where we wish to contact and inform you about our latest offers and special promotions.

The main use of your personal data is therefore to manage your online reservation, which is one of our main tasks. We can also offer other related products and services of third parties. These will be available through our web services. If you choose to use them, we will use your personal information to complete and manage orders as we would have done when booking accommodation.

We also use your information for marketing activities. These may include the following:

- Use of your contact information to send news regarding products and services after booking with us. Such communications can easily be cancelled at any time - by clicking on the link 'Cancel information receiving', which is included in all our newsletters.
- Based on the information you share with us, individualised offers may be displayed for you on the website of Adria Holidays, in the mobile applications, or on the websites of third party applications. These can be offers that can be directly booked at Adria Holidays page or offers or products of third parties, for which we think you might find interesting.
- When you participate in other promotional activities (such as contests, competitions or programs recommendations), appropriate data will be used for the management of these promotions.

We can also enable our users to join an account in the context of which they can communicate with other users through online groups. All such activities may be visible to other account holders or accommodation partners.

We may also use your information to communicate with you. We may also contact you in other cases, among others, via e-mail, regular mail, telephone or SMS message - the selected method depends on contact information that you shared with us. We also process all kinds of communications that you send us. This may be for several reasons, including:

- The answer to your accommodation requirements and their processing. Adria Holidays also offers a variety of ways for the exchange of information, requests, comments about accommodations, and existing reservations between guests and accommodation partners. All communication takes place via Adria Holidays. For more information, read the section below.
- If your online booking is not finished, we can send you an e-mail reminder for the continuation of the reservation. We consider this additional service helpful, because it allows the continuation of the reservation, without having to search for accommodation or re-enter booking data again.
- When using our services we may send you a questionnaire or ask you to send us your comments regarding experiences with Adria Holidays.
- We may also send you other material, connected to your reservations, e.g. instructions on how to contact Adria Holidays, if you need help, while you are on the way, and information, for which we think, that would be helpful for you when you plan your stay. We can also send documents in connection with your active reservations or a summary of previous reservations, which you made through Adria Holidays.

Even if you do not have an active reservation, we can send you other administrative messages, which may include security warnings.

Sometimes we ask our customers for cooperation in market research. Any additional personal information that you provide as part of market research will only be used with your permission.

To create a trustworthy environment for you, other travellers, business partners of Adria Holidays, and accommodation partners, we may use personal data to detect and prevent scams and other illegal or undesired activities. We can also use personal information for risk assessment and safety purposes, including authentication of users and reservations. For these purposes, certain reservations may be temporarily put on hold.

Personal information is also used for analytical purposes as part of our effort to improve our services and improve the user experience. The data can also be used for testing, troubleshooting, and to improve the performance and quality of our online services. The main objectives are to optimize and tailor our online platform to your needs, making our site easier and more enjoyable to use.

Guest comments and other information in connection with the destinations: during your stay and after it, for any accommodation booked through us, we may invite you to submit your comment. Submission of comments can also be enabled for guests who are travelling with you or for whom you have made a reservation. In this invitation, we may ask you to share information on accommodation, destination and other services that you have booked through Adria Holidays.

A completed questionnaire about the Provider may be a) published on our website with the information on the provider, exclusively as information for future guests on the quality of the accommodation and services; b) according to our own judgement (e.g. marketing, promotions or improvement of our services) use (in part or completely) and publish on our website or on the online / social networks, in newsletters, special promotions, applications and other forms of

communication, owned and used by Adria Holidays, which you explicitly consent to, if you fill out and send us a questionnaire, evaluation or opinion. Adria Holidays has the exclusive right, in its sole discretion, to adapt, modify, refuse or remove comments.

If you specify whether a comment helped you or not, we will combine this with the opinions of others, which will influence the classification of the comments of guests. The data in your lists or other data associated with destinations can be used in anonymised form, unless you used it in your public profile. Thus, we help other users, including potential ones, to find the most appropriate destination or accommodation

After using the Adria Holidays service, guests receive an automatic email requesting them to evaluate their stay in the campsite. We will enter all ratings into the rating processing system and publish them on our website. By doing so, we inform other guests or potential guests of the quality of the accommodation in which you were staying, destination you selected and other services that you have used.

During telephone calls to Adria Holidays staff, live monitoring of calls can be performed, and calls can be recorded in order to provide evidence of a commercial transaction or any other business communication. **In the event of recording, the user shall be informed of this, including the storage time of the recording and the purpose of the recording, before or at the beginning of a telephone conversation.**

**The recordings can be kept for up to three years and then automatically deleted** unless Adria Holidays has a legitimate reason to retain these recordings longer (and if it is reasonably necessary), inter alia, for the purposes of fraud investigation. All call recordings will be treated in accordance with this Privacy Statement.

When processing your data in the manner described above, we comply with the following legal basis:

**Implementation of the contract:** the use of your data is sometimes necessary for the implementation of the contract you concluded with us. If you use our services to process online booking, we will use your information to fulfil our commitments on the enforcement and monitoring of reservations under the contract we have with you.

**Legitimate interests:** your data can be used for our legitimate interests, such as providing the most appropriate content of the websites, e-mails and newsletters, to improve our products, services and content of our web pages, and for administrative and legal purposes, and the purpose of fraud detection.

**Legal purposes:** in addition to the above in some cases we use your information for the settlement of legal disputes, regulatory investigations and compliance with, or enforcement of the terms of use online booking service Adria Holidays, in a reasonable, expected manner.

**Consent: for the use of your data in some marketing purposes, we need your consent. The consent may be revoked at any time by contacting us at the address listed at the end of this Privacy Statement.**

Adria Holidays services, for various reasons and in different ways, combine a variety of third parties. The main reason is that to complete your reservation booking details are shared with accommodation. There are also other entities that receive some of your data which we use to provide Adria Holidays services, financial institutions, advertisers, and, in some cases, national authorities.

In the event that Adria Holidays will transfer personal data to third countries, where the reserved accommodation is located and has booked a holiday in the name of the guest in this accommodation, Adria Holidays will take into account all the protection measures and act in accordance with the GDPR.

### ***Message Processing***

Adria Holidays can help you and accommodation partners in the exchange of information and the demands for accommodation, as well as existing reservations, by redirecting communications via Adria Holidays.

Adria Holidays can access the communication and use automated systems for review and analysis of communications for safety purposes, the purpose of preventing abuse, compliance with legal and regulatory requirements, research, commitment of the guests, including provision of information and offers that we believe you can benefit from, and for helpdesk and technical support purposes. We reserve the right to block transmission of a communication or its review, if we, at our sole discretion, believe that it contains malicious content, spam or presents a risk for you, the accommodation partners, Adria Holidays, or other parties involved. All communication that was sent or received using the tools of communication Adria Holidays will be received and stored by Adria Holidays. Business partners whose platform you used for booking and accommodation partners may decide to directly communicate with you via e-mail or other channels that are not controlled by Adria Holidays.

With any external legal or natural person, performing individual tasks in connection with the collection, processing, storage/transmission or processing of personal data (data processor), a written contract provided for in Article 28 of the GDPR will be concluded.

### ***Use of mobile devices***

Using the services of social media may be included in Adria Holidays services in several ways, including the provision of certain personal data or, that social media provider receives some of your information.

We have free apps for different mobile devices as well as numerous versions of our regular web pages that have been optimized for browsing on your mobile phone or tablet. These apps and mobile websites process the personal information that you provide in the same way as it applies to our website, and we also allow you to use location services to find nearby accommodation. With your consent, we may send you messages about your reservation. You can also enable us to access your location data or contact information for us to provide the required services. When you use your mobile phone to download an image, this can be tagged with information about your stay. Please read the instructions of your mobile phone, where you can learn how to change settings, and enable the sharing of such data or receiving such messages.

Adria Holidays can use the so called tracking devices for the purpose of optimizing our services and marketing activities. This can be done using cookies or not. For more information about cookies and other similar technologies, please read our statement below on cookies. By tracking the devices Adria Holidays can monitor user behaviour on different devices. As part of the tracking devices, Adria Holidays can combine data, obtained from a particular browser or mobile device, with another computer or device, connected to the computer or device from which the data was collected.

Personalized advertising, which is displayed to you on other websites or in applications, may be offered based on your activities on connected computers and devices. To unsubscribe from behavioural advertising program, check out our [Statement on Cookies](#), which defines how you can

opt out of tracking devices for marketing purposes. If you sign out of your account, it does not mean that you're signed out of personalized ads.

At Adria Holidays, Social media is used in different ways. They are partly used to enable services of online booking and promotion of services or products of business partners, and for advertising, improvement and facilitation of our services.

### **Integration of Social Media Plug-ins**

On the website and in the applications of Adria Holidays, we integrated social media plug-ins. This means that when you click on one of the buttons (for example Facebook "Like"), sharing of certain information with these providers of social media occurs. If you are also logged in to your social media, social media provider may connect this information with your social media account and can offer specific options on the profile of social media that you can share with others in your network.

### ***Other Services and Features of Social Media***

To interact with Adria Holidays or your contacts about our services, we may also integrate other social media services (such as messaging). We can also own social media accounts and offer applications on different social media sites. Whenever you connect to Adria Holidays via social media, the provider of social media can enable you to share information with Adria Holidays. If you decide to share, the provider of social media will usually notify you, what information will be shared. For example, if you log into your Adria Holidays account through your social media, some information (as permitted to the social media service provider) will be shared with Adria Holidays. This information may include your email address, age and profile pictures that you have stored in the user account.

When you use the Adria Holidays app to register on social media or connect to the service of social media notification, without having an Adria Holidays user account, the data you wish to share with us may include basic data, available in your social media profile (including e-mail address, status updates and contact list). We use this information to offer you services that you have requested, for example, to convey the message you want to send to contacts, or to create a better user experience in the application or on our website. This means that services can be tailored to your needs, you and your friends connected with the best destinations and accommodation, and that we can analyze and improve our services. Your social media providers can tell you more about how the data are used and processed every time you connect to Adria Holidays through them.

### ***Procedures of Safety and Storage of Your Personal Data***

In accordance with European and national legislation on data protection, we follow the appropriate corrective actions to prevent unauthorized access to personal data and its abuse.

For the purpose of the protection and privacy of personal information submitted to us, we use appropriate business systems and procedures. We also use security procedures and technical and physical restrictions for access and use of personal data on our servers. Access to personal data is only authorized for personnel during their work, and they are bound to protect the confidentiality of personal data, which obliges them even after leaving office, employment, performance of tasks or duties, or provision of services of contract processing.

The collected personal data can be kept in the personal data collection until withdrawal of your consent to the processing of personal data or for as long as necessary to achieve the purpose for which your personal data is processed or the legal requirements are met.

When, as a part of the booking procedure, your full credit card data is required, we store them for a maximum period of 10 days. After that, your credit / debit card data (in whole or in part) will be permanently deleted or stored safely, with restricted access, for the purpose of detection of abuse. Your credit / debit card data can also be saved in your user account. If you choose to do so, the data of your credit / debit card is stored in coded format, with the exception of the last four digits of your credit / debit card number. This will allow you to know which card you use for payment.

Services offered by Adria Holidays are not intended for children under 18 years of age or persons who are not competent of fully independent actions; in any other case, the use of any of our services is allowed only with the consent of parents or guardians. If we receive this type of information, we reserve the right to delete such information. In limited cases as part of the reservation, purchase or other services related to travel, or in other exceptional cases (such as features designed for families), Adria Holidays with the approval of parents collects and uses information about children.

### ***Ensuring and enforcing the rights of data subjects***

Data subject has the right to obtain confirmation that his personal data are being processed and, if so, right to access his personal data (access) and information referred to in paragraph 1 of Article 15 of the General Data Protection Act.

Data subject has the right to have his inaccurate or incomplete personal data corrected without undue delay.

Data subject has the right to have his personal data deleted without undue delay where one of the following reasons applies:

- personal data are no longer needed for the purposes for which they were collected or otherwise processed;
- data subject withdraws the consent on the basis of which the processing takes place and there is no other legal basis for processing;
- data subject opposes the processing and there are no overriding legitimate reasons for processing them;
- personal data has been processed illegally;
- personal data must be deleted in order to fulfil a legal obligation to comply with obligations set by law;
- personal data were collected in connection with the offer of information services from a minor.

Data subject has the right to limit processing of his personal data, if one of the following applies:

- data subject disputes the accuracy of the data, for a period that allows verification of the accuracy of personal data;
- processing is illegal and data subject opposes the erasure of personal data and, instead, requires a restriction on their use;
- personal data is no longer needed for processing purposes, but required by the data subject to enforce, prosecute or defend legal claims;
- data subject has filed an objection concerning the processing, until it is verified that legal reasons of the data controller prevail over the grounds of the data subject.

Data subject has the right to receive personal data that he has transmitted in a structured, widely used and machine-readable form, and the right to forward this information to another data controller without hindering him in this when:

- processing is based on consent and
- processing is carried out using automated means.

The data subject shall have the right, at any time, to object to the processing of personal data relating thereto on grounds of legitimate interest, including creation of profiles based on those provisions, on grounds relating to his particular situation. Data processing shall cease unless the necessary legitimate reasons prove the grounds for processing that prevail over the data subject's interests, rights and freedoms, or the enforcement, prosecution or defence of legal claims.

Where personal data are processed for the purposes of direct marketing, the data subject shall have the right to object at any time to the processing of personal data relating to him for the purposes of such marketing, including the creation of profiles insofar as this relates to such direct marketing.

The data subject shall be reminded of the right referred to in the above two paragraphs at the latest at the time of the first communication with him. His rights will be presented in a clear way and separately from other information.

The data subject has the right not to be subject to a decision based solely on automated processing, including the creation of profiles with legal effects in relation to him or that has a significant influence to him in a similar manner. The latter does not apply insofar as there is one of the reasons given from the second paragraph of Article 22 of the GDPR.

In the event that personal data have not been obtained from the data subject to whom they relate, information and rights are provided to him in accordance with the privacy statement/general conditions and information in accordance with Article 14 of the GDPR.

You have the right to, at any time, withdraw a given consent to the processing of personal data for one or all of the purposes of the processing of personal data with which you have consented.

You always have the right to inspect, transcribe, copy, supplement, correct, block and delete your personal data which is stored. Review of your personal information can be requested by contacting us through our website, under the tab Contact, where you can leave a message, or by sending us an e-mail to the e-mail address [info@adria-holidays.net](mailto:info@adria-holidays.net).

Supervision of the processing of personal data on the website of Adria Holidays and its mobile applications is carried out by Adria Dom d.o.o. Kanižarica 41, 8340 Črnomelj, Slovenia.

#### **DECLARATION ON COOKIES**

Cookies and other tracking technology can be used in different ways on our website and within the Adria Holidays applications for the purpose of analyzing traffic or advertising. These technologies are used directly by us or our business partners, including service providers of third parties and advertisers with whom we cooperate.

We obtain an explicit permission to record cookies from a website user. The user has the option to withdraw the consent to download cookies at any time.



A cookie is a small amount of data that is installed in your computer's browser or on your mobile device. The so-called party cookies are cookies that are used by an entity that manages the domain name through which they are installed. Cookies of Adria Holidays are therefore proprietary cookies. If we allow others to use cookies via Adria Holidays websites and applications, they are called cookies from elsewhere.

Cookies from other sites: these cookies are not issued by the website that the user is using, but other websites. The user of the website is informed in a comprehensible manner that such cookies will be loaded upon consent. The user has the option to withdraw the consent to download cookies at any time.

There is also a difference between session and persistent cookies. Session cookies exist until you close the browser. Permanent cookies have a longer duration and are not deleted when you close your browser. We are trying to use or allow the use of cookies with a maximum duration of 5 years. Only in exceptional cases, for example for safety reasons or when it is really necessary, the cookie will have a longer duration.

In addition to the cookies we use other technologies similar to cookies. These may include web beacons (also known as pixel tags, web bugs or gif), tracking URL addresses or packages for software development (SDK). A web beacon is a small graphic image that is only one pixel in size and can be delivered to your computer as part of the requirements of the website via the application, commercials or HTML e-mail message. The pixels can be used to transfer information such as device type, or operating system, IP address and time of visit from your device. They are also used for the installation and reading of cookies in your browser. Tracking URL addresses is used for the determination of a website that referred you to the website of Adria Holidays, or to determine the application that is used. SDK is a code, included in the application, which acts as cookies and web beacons.

All of this technology in this statement on cookies is jointly called **cookies**.

### ***Use of Cookies***

We use cookies for various purposes. They enable you to be recognized as the same user on all pages of the website, between various websites, and the use of applications.

Our website and applications use cookies for various purposes.

*Technical cookies:* We try to offer your visitors advanced, user-friendly website and apps that automatically adapt to their needs and desires. Technical cookies are thus used to show our website, to make the website function properly, so user account may be created, signed into, and so that your reservations may be managed. For the proper functioning of our website the technical cookies are thus indispensable.

*Functional cookies:* We use functional cookies to remember your preferences, too, and to help you make efficient use of websites and applications. These cookies, for example, remember your chosen currency, language, your searches and already viewed accommodation. Cookies can also be used to remember your registration information, so that, each time you visit our websites, you do not need to enter the data again (because it can be annoying). Your password, however, is always encrypted. These functional cookies are not strictly necessary for the operation of our website, but provide added opportunities and enhance your experience when using the services of Adria Holidays.

*Analytical cookies:* These cookies are used for insight into how our visitors use Adria Holidays. That way, we can find out what works and what does not, improve our website and applications, understand ad performance and communication, and ensure that they remain interesting and useful. The information we collect may include the websites that you visit the sites where you enter and exit, which platform you use, what emails you opened and used, and the date and time. This means that we can also use the information on how you use the site, such as the number of clicks on a given page, mouse movements and scrolling of pages, words you are looking for, and the text that you enter on the page. Analytic cookies are used as a part of our online advertising to find out how users use our site or app after they are shown an online ad. These may include third-party ads. Analytical cookies can also be used to enable business partners to find out whether their customers use the accommodation offers that are part of their websites.

*Advertising cookies:* We use cookies of third parties and our own cookies to show ads on our own website and other websites. This is called re-targeting based on your search history, such as: searched destinations, viewed accommodation and displayed prices.

To learn more about cookies and their management or deletion, please visit [www.adria-holidays.net](http://www.adria-holidays.net) 'Cookies' and the help section in your browser. In your browser, such as Internet Explorer, Safari, Firefox or Chrome, you can select which cookies you want to accept and which to reject. The exact location of these settings is different in each browser. You can find them by using the help option in your browser.

If you choose to disable certain technical and / or functional cookies, some functions on our website may not be available. Currently we do not support the browser setting "Do Not Track". If there is a common standard as to what exactly that means, we will consider support for this option.

## **Advertising**

**In connection with online advertising and advertising companies we are trying to work only with companies that are trustworthy. These companies take into account industry standards and rules of behaviour and allow you to not participate in advertising with behavioural targeting.** In order to be excluded from behavioural advertising program, select the check box for the company from which you would like to exclude. You can also visit [www.adria-holidays.net](http://www.adria-holidays.net) 'Cookies' to learn how to remove yourself from personalized advertising. Your mobile device lets you restrict your information sharing settings for the purpose of redirection. If you unsubscribe from a network of online advertising, it does not mean that you will no longer receive online advertising or be subject to online advertising or marketing analysis. This means that the network from which you are logged out, will no longer deliver ads tailored to your web preferences and browsing patterns.

## **Analytics**

In order to monitor the collection of data for analytical purposes using Google Analytics for certain types of browsers, visit the Google Analytics Opt-out Browser Add-on (desktop only). In order to monitor the collection of data for analytical purposes through Yandex.Metrica (tracking pixel, owned by Russian search engine Yandex), users who have the language set to Russian, Ukrainian or Turkish, please visit: [yandex.com](http://yandex.com). Yandex.Metrica does not apply to other languages. You also have the option not to participate in personal search engine advertising by Yandex. To do this, visit this page and uncheck field "Take my wishes into consideration."

If you have questions, suggestions or comments regarding this Statement on Cookies, send an e-mail to [info@adria-holidays.net](mailto:info@adria-holidays.net) . This Statement on Cookies can be - as the general conditions themselves - changed from time to time. If you want to be up to date with changes regularly visit this page.

Ljubljana, 5<sup>th</sup> July 2018

Phone: +386 7 35 69 300 | Email: [info@adria-holidays.net](mailto:info@adria-holidays.net) | Web: [www.adria-holidays.net](http://www.adria-holidays.net)