

# Information on the processing of personal data of guests and members

Data privacy is important to Villa Dagmar and we want to be open and transparent with our handling of your personal data.

Therefore we have a policy that determines how your personal data must be processed and protected.

## Who is responsible for your personal data?

Stockholm Nybrogatan 25-27 AB, Nybrogatan 25-27, 114 39 Stockholm.

Organization number: 559039-4317 is responsible for the personal data that you provide us and is responsible for your personal data in accordance with current data protection regulations.

## Where do we store your personal data?

The information we collect from you is stored for internal use in Villa Dagmar's computer system in a secure manner. The data is needed to manage your booking and is only handled by authorized staff at Villa Dagmar and a few well-selected partners and suppliers to our systems.

Villa Dagmar has taken appropriate technical and organizational measures to protect your personal data against e.g. loss, tampering or unauthorized access. We continuously adapt our security measures to ongoing technological developments.

## Information from and about you that we collect and process

We only collect personal data that is relevant for the purpose described in the special conditions. The information that may be collected is e.g. information about name, address, telephone number, e-mail address, social security number, IP address, information to facilitate the use of the services (such as login), default language, user history, information about membership, information about your travel company, booking preferences, payment, employment, contacts in emergency situations, requirements for a special diet, requirements for disability adaptation and other information you provide when using the services. Examples of personal data from companies outside Villa Dagmar include updated address information and demographic information.

## Hotel Diplomat use personal data to:

1. Administer, provide, develop and maintain our services.
2. Process your bookings, your payment and orders for the services.
3. Contact you via e.g. SMS, other mobile applications, email or to notify you of your booking status or information relating to your booking before, during and after your stay.
4. Diagnose errors, optimize the technology and be able to contact you in case of problems with a booking or the performance of the services.
5. Analyse and improve the quality and experience of the services, e.g. verify that your user account is not being used by others.
6. Individualize the communication with you regarding our services, e.g. by creating a profile for you and sending offers that suit your profile as a user of our services.
7. Analyse statistics and user behaviour regarding our services.
8. Comply with current legislation.
9. Increase your benefit and experience of our services in other ways we think you would appreciate.
10. Market our services.

You have the right to request the deletion of your data at any time.

Please send an email to [unsubscribe@diplomahotel.com](mailto:unsubscribe@diplomahotel.com)

## Who has access to your data?

Your data can be shared within Villa Dagmar and between subsidiaries.

We never pass on, sell or exchange your data for marketing purposes to third parties. Data forwarded to third parties is used only for us to provide our services to you. This means that we do not provide information that can be linked to you, such as receipts and confirmation of your stay, to third parties without a legal basis, Villa Dagmar may disclose personal data to third parties, such as e.g. police or other authority, if it concerns the investigation of a crime or if Villa Dagmar is otherwise obliged to disclose such information based on law or authority decision.

## On what legal basis is the data processed?

Each time we receive your personal data, we inform you whether the provision of personal data is statutory and/or mandatory to enter into a contract, and whether it is mandatory to provide the personal data and any consequences if you choose to do so. It is not a legal or contractual requirement to provide your personal data to us, and you are not obliged to provide your personal data. If you do not provide your personal data, it may, however, affect our ability to enter into contracts, deliver and provide our products and services to you, as well as to administer the contractual relationship and fulfil our obligations in relation to you.

## What are your rights?

### **Right of access:**

You have the right to request information about the personal data we hold about you at any time. You can contact Villa Dagmar, verify yourself with a valid ID card with us and we will send you your personal data via e-mail.

### **Right to data portability:**

Every time Villa Dagmar processes your personal data in an automated way after your consent or according to an agreement, you have the right to have a copy of your data in a structured, common and machine-readable format transferred to you or another party. It only includes the personal data you have shared with us.

### **Right to rectification:**

You have the right to request correction of your personal data if it is incorrect, including the right to supplement incomplete personal data. If you have a member membership, contact Villa Dagmar to see what information we have about you and if you want to edit your personal data.

### **Right to erasure:**

You have the right to delete all personal data processed by Villa Dagmar at any time.

### **You have the right to unsubscribe from contact and direct marketing:**

You have the right to unsubscribe from contact and direct marketing. You can opt out of direct marketing by following the instructions in each marketing mailing or on the website.

## How can you use your rights?

We take data protection very seriously and therefore have dedicated staff to deal with your requests regarding your rights as set out above. You can always contact us at [unsubscribe@diplomathotel.com](mailto:unsubscribe@diplomathotel.com).

### **Right to lodge a complaint with a supervisory authority:**

If you believe that Villa Dagmar is processing your personal data incorrectly, please contact us. You also have the right to lodge a complaint with a supervisory authority. We process your personal data for the purpose of being able to deliver and provide our products and services to you as a guest in the best way and to fulfil and administer our agreement with you.

### **How long do we save your data?**

We keep your data for 100 days in the case of telephone and e-mail messages and for 12 months in the case of bookings. In the event of a complaint, your data will be saved for two years. If you are a member of our loyalty program, Villa Dagmar, keep your data as long as you are an active guest/customer.

### **Updates on GDPR work:**

We work to strengthen your personal integrity and may need to update our GDPR work on an ongoing basis. The latest version of the work is always available on our website. We notify you of any significant changes in the work, for example the purpose of the use of your personal data, the identity of the agent or your rights. All hotels within the EU work with the following:

- Identify and report security incidents to the Data Inspectorate within 72 hours of discovery of the breach.
- Within 30 days, be able to present all data about the guest upon request from him and provide an easy way for his guests to get hold of this data - these requests are called Subject Access Requests (SARs).
- Limit the use of personal data processors outside the EU, or set up a process to prevent the export of data outside the EU.
- Be able to demonstrate to the data inspectorate that procedures are followed according to GDPR.
- Ensure that agreements are in place with service providers that handle information involving data covered by the GDPR (applies to most agreements).
- Rewriting privacy policies.

- Update the consent request with personal data owners so that the use of data is clear and traceable.
- Have knowledge of GDPR to know that the processes you manage follow the law.
- Have the opportunity to act immediately in the event of withdrawal of consent and deletion requests.