

# PRIVACY POLICY

## I. GENERAL PROVISIONS

1. This Privacy Policy (hereinafter referred to as the Policy) shall regulate the principles and procedure of personal data processing by R. Meškos Firma UAB, headquartered at Kęstučio St. 58-8 in Kaunas, Lithuania, E-mail: [info@kaunascityhotel.com](mailto:info@kaunascityhotel.com), Enterprise No. 234894840 (hereinafter referred to as the Data Controller) and the Data Controller's website operation conditions (<http://kaunascityhotel.com/>) (hereinafter referred to as the Website).
2. The Policy is applicable to all individuals who visit the Company's Website (<http://kaunascityhotel.com/>) and uses the website information or its services.
3. In this policy, Data Subject shall refer to any individual person whose data is processed by R. Meškos Firma UAB.
4. By using the offered services and continuing to browse on the Website, its visitor (the Website user) confirms to have read the Privacy Policy, understood its terms and conditions and agreed to follow them.
5. The Data Controller shall ensure that the goal of enforcing and implementing this Policy shall be to uphold the following key principles of personal data processing:
  - 5.1. The personal data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject ('lawfulness, fairness and transparency').
  - 5.2. The personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
  - 5.3. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation').
  - 5.4. The personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization').
  - 5.5. The personal data shall be accurate and, where necessary, kept up to date within a reasonable period of time from their changes.
  - 5.6. Every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy').
  - 5.7. The personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
  - 5.8. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organizational measures required in order to safeguard the rights and freedoms of the Data Subject ('storage limitation').
  - 5.9. The personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ('integrity and confidentiality').
  - 5.10. The Data Controller shall be responsible for, and be able to demonstrate compliance with, the listed principles ('accountability').
6. This Policy has been prepared in accordance 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, hereinafter referred to as the GDPR), the Law on Legal Protection of Personal Data of the Republic of Lithuania (hereinafter referred to as the LLPPD) and other laws of the European Union and Lithuania. The definitions used in the Policy shall have the same meanings as in the GDPR and LLPPD.

## II. LEGAL BASIS FOR PERSONAL DATA PROCESSING

7. R. Meškos Firma UAB collects and processes personal data pursuant to the laws of the European Union and the Republic of Lithuania regulating personal data protection. The Company processes personal data on the Website on the below-listed basis.

8. Consent which is given by your actions, i.e. contacting us and giving us your personal data or other actions.

9. Implementation of our legal interests (e.g. Website administration and ensuring its proper operation).

10. For the purpose of fulfilling our obligations set forth in the laws.

11. The Company aims to process the personal data in an accurate, honest and transparent way and to handle them for the purposes they were collected for, in line with the fairness and transparency principles set forth in the laws.

## III. INFORMATION ON THE COOKIES WE USE

12. The Data Controller uses cookies on the Website to differentiate between its users. The cookies help the Data Controller to ensure a more pleasant experiences to the individuals browsing the Website and to improve the Website itself.

13. Cookies are small text files that are stored at your browser or device (personal computer, mobile phone or iPad).

14. The Website of <http://kaunascityhotel.com/> uses the following cookies:

Cookie type	Cookie name	Purpose	Domain	Expiration time
Functional	pll_language	To store the language preferences of the Website user	http://kaunas cityhotel.com/	1 year
Third party	c_user	Used by Facebook to determine whether or not the user has chosen the “remain logged-in” function		4 months
	datr	Used by Facebook to determine the user’s browser type		2 years
	dpr	Used by Facebook, not classified		5 weeks
	fr	Used by Facebook to maintain the chatting function		2 years
	presence	Used by Facebook, not		Session

		classified		
	sb	Used by Facebook, not classified		Constantly
	spin	Used by Facebook, not classified		24 hours
	wd	Used by Facebook for the purpose of website optimization		10 days
	xs	Used by Facebook to determine whether or not the user has chosen the “remain logged-in” function		1 year
	BookingUser SessionV1	Used by external booking system (Booking.com) to confirm bookings.		Session
	bvsrv	Used by external booking system (Booking.com) to confirm bookings.		Session
	ea-ensure-cookie	Used by external booking system (Booking.com) to confirm bookings.		Session

15. The cookies used in the Website do not allow to determine the personal identity of its user. All visits of the Website are registered anonymously, only recognizing the personal computer, mobile phone or iPad and its IP address. No collected information is passed over to any third parties, except in cases stipulated by the laws.

16. By visiting the Website and clicking the “I agree” button in the pop-up window, the users consent to the storage of the cookies in their device, mobile phone or iPad.

17. To revoke their consent, the users can either delete or block the cookies by changing the respective settings in their browsers that allow to block all or part of the cookies. It should be noted that blocking cookies (including the required ones) might result in certain issues with using all or part of the Website functions.

18. The personal data collected by the cookies are processed in accordance with the Law on Legal Protection of Personal Data of the Republic of Lithuania, the Law on Electronic Communications of the Republic of Lithuania, 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 and other laws regulating personal data protection.

19. Pursuant to the applicable laws, the Website has certain safety measures to prevent illegal disclosure of personal data and its subsequent unlawful use.

#### **IV. PERSONAL DATA PROCESSING FOR OTHER PURPOSES**

20. We can process your personal data for other purposes as well, provided that we have received you (Data Subject's) informed consent or such processing is carried out on the basis of other legal processing criteria set forth in the laws.

## **V. PERSONAL DATA PROCESSING AND STORAGE TERMS**

21. Your personal data shall be processed and stored for no longer than required for the purpose the data were collected for or for a period of time set forth in the laws.

22. The personal data may be stored for longer periods of time than stipulated hereof only in the following cases:

22.1. In case of reasonable suspicions of illegal activities, which are under investigation

22.2. Your data is necessary for proper resolution of a dispute or a claim

22.3. In case we have received complaints about the respective visitor or have notices violations made by the said visitor

22.4. For the purpose of making reserve copies or other purposes related to information system maintenance and operation

22.5. In case of other basis, conditions or circumstances set forth in the laws.

## **VI. DISCLOSURE OF PERSONAL DATA AND THIRD PARTIES WHO HAVE THE RIGHT TO RECEIVE IT**

23. The Company shall not disclose your personal data to any third parties without your prior consent, except for the cases stipulated below.

24. We have the right to transfer your data to the third parties that assist us in our activities and administration of the provision of services. Such entities encompass data centers, care and other service institutions, software developers, suppliers and providers of technical maintenance, companies render IT infrastructure services, communication companies, online browsing and internet analysis companies, security companies, etc.

25. In each separate case, only the data required for the specific transaction shall be transferred to the Data Processor.

26. The data processors contracted by us shall manage your personal data following our instructions. They must ensure the security of your data according to the laws and the written agreements made with us.

27. The data may also be supplied to the competent governmental or law enforcement institutions, e.g. police or law enforcement institutions, upon their request and following the procedure set forth in the applicable laws, making sure to protect our rights and safety or our customers, employees and resources and to defend and exert our legal rights.

## **VII. YOUR RIGHTS**

28. The laws regulating data protection grant you certain rights in relation to your personal data processing.

29. You have the right to access the personal data processed by us:

29.1. You have the right to ask for our confirmation whether or not we are processing your personal data and, if so, to request to view the personal data processed by us. If you wish to do so, please send us a written request by e-mail at [director@kaunascityhotel.com](mailto:director@kaunascityhotel.com).

30. You have the right to ask to correct inaccurate data.  
30.1. If you believe that the information we hold is incorrect or incomplete, you have the right to request us to fix it. If you wish to do so, please send us a written request by e-mail at [director@kaunascityhotel.com](mailto:director@kaunascityhotel.com).
31. You have the right to refuse to agree to your personal data processing:  
31.1. You may object to personal data processing when it is done so in our legal interests. However, despite your objections, we might continue processing your data if we have reasonable cause to do so. If you wish to object to personal data processing, please send us a written request by e-mail at [director@kaunascityhotel.com](mailto:director@kaunascityhotel.com).
32. You have the right to erase your personal data (the right to be forgotten):  
32.1. In certain circumstances, you have the right to ask as to erase your personal data; however, this shall not apply in cases, where we must store your data according to the applicable laws. If you wish to erase your personal data, please send us a written request by e-mail at [director@kaunascityhotel.com](mailto:director@kaunascityhotel.com).
33. You have the right to restrict your personal data processing:  
33.1. In certain circumstances, you have the right to restrict your personal data processing. If you wish to do so, please send us a written request by e-mail at [director@kaunascityhotel.com](mailto:director@kaunascityhotel.com).  
33.2. You have the right to file a claim regarding improper personal data processing to the State Data Protection Inspectorate directly or by e-mail at [ada@ada.lt](mailto:ada@ada.lt)

## **VIII. FINAL PROVISIONS**

34. This Privacy Policy shall be governed by the laws of the Republic of Lithuania.
35. The Data Controller shall not be liable for any damages, including the ones conditioned by Website errors, data loss or damage, arising due to actions, inaction, mistakes or deliberate harm of the individual himself/herself or third parties acting with the permission of the respective individual, and for other improper use of the Website.
36. The Data Controller shall not be liable for any errors in logging-in and/or using the Website and/or resulting damages, occurring due to the actions or inaction of third parties unrelated to the Data Controller or the individual, including but not limited to electric power or Internet access faults, etc.
37. The Data Controller retains the right to partially amend or fully change the Policy.
38. Any changes or supplementations to the Policy shall come into force as of their announcement on the Website.
39. If an individual continues using the Website and/or the services rendered by the Data Controller following the changes or supplementations of the Policy, it shall be deemed that the said individual has agreed to the respective changes and supplementations.
40. If you have any questions concerning personal data processing, please do not hesitate to contact us by e-mail at [director@kaunascityhotel.com](mailto:director@kaunascityhotel.com).
41. This Privacy Policy shall be applicable as of January 20, 2020.