

## **Privacy Policy**

An important aspect of the business of Pamporovo AD is to ensure the protection of the personal data and to guarantee the transparency regarding their processing. In this regard and in compliance with the requirements of Regulation (EC) 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) we would like to present to you some general information about us and the processing of personal data we carry out in the various relations we establish in the course of use of our E-STORE.

### **Contact details of Pamporovo AD**

Pamporovo AD, registered with the Commercial Register at Registry Agency under UIC 830166943, with seat and registered office: Pamporovo Resort 4870, Municipality of Chepelare, Hotel Orlovets, is a data controller pursuant to Regulation (EC) 2016/679 and the Personal Data Protection Act.

The Company's business address is: Pamporovo Resort, Hotel Orlovets, and the correspondence details: Pamporovo Resort, Hotel Orlovets; E-mail: marketing@pamporovo.me; tel.: +359 (0) 700 17 702.

### **Data Protection Officer**

Pamporovo AD has appointed a Data Protection Officer with address: Pamporovo Resort 4870, Municipality of Chepelare, Hotel Orlovets; e-mail: dpo@pamporovo.me /contact telephone: +359 3 0958409; +359 888 415 598. The Personal Data Protection Officer meets the requirements of the General Data Protection Regulation and reports directly to the Board of Directors of Pamporovo AD.

### **How can you provide us with your personal information?**

1. By signing up in the E-STORE
2. By sending a request to purchase a pass covering more than two days or by using our package services, including the provision of ski / snowboard equipment and/or ski school in a group or buying a SPA package.
3. By visiting our website or our social media accounts in Facebook, Instagram, etc.

In this Policy we will outline the type of information that is usually collected in each of these circumstances, the reasons for this collection and how we will use it and store it.

### **Signing up in the e-store**

To use our e-store you can sign up, for which you are required to provide data, such as username (along with a password), full name, country of residence, date of birth and e-mail.

- The setup of a username and password is required for your subsequent signing in the website. To prevent personal data from leaking from your user account, please keep them and do not disclose them to anyone under any circumstances;
- The e-mail is required to confirm the registration, as well as for subsequent contacts related to the provision of services. We can send marketing messages to the e-mail specified by you in compliance with the provision of Art. 261 (2) of the Electronic Communications Act, and you can object to this at any time easily and free of charge.
- Apart from the cases under Art. 261 of the Electronic Communications Act, sending of marketing messages for the purposes of direct marketing and advertising is only allowed with the prior consent of the user. This consent may be withdrawn at any time. Your explicit written consent can be obtained, for example, when you fill in a separate form for receiving our newsletter.

## **Reservations / request for purchase of lift passes and services**

When you make a reservation or request our services, you are required to provide us with your personal data so that we can identify you, contact you, if necessary, and subsequently provide the services you have paid for. This information usually includes your full name, country of residence, date of birth, e-mail address, as well as data on weight, height, number of shoes, level of proficiency in skiing/snowboarding, and your language preferences, if your order is for equipment and ski school. We may use the information provided to send you offers and information about the services of Pamporovo AD. If you want to receive such information, you can subscribe to our newsletter by checking the relevant box on our website to give your consent to receive special offers from us. If you no longer want to receive such offers and information, you can unsubscribe at any time by clicking on "Unsubscribe" link in the message. Each commercial message from us to you will contain instructions for unsubscribing and a link "Unsubscribe".

## **When visiting our website or our social media accounts:**

We use “cookies” on our website. Cookies are part of the information that a website transfers to your hard drive for record keeping purposes. The use of cookies is an industry standard - you will find them almost everywhere on the Internet. Our websites use cookies to identify visitors when they subsequently visit the website. Once we identify you as a visitor, we can personalize your online visit and make it more useful and convenient for you. We may also evaluate our content and services and prepare our website for the visitors based on other information we collect, such as IP addresses, which are numbers assigned to your computer when using the Internet, pixel tags (or transparent GIF images), the type of Internet browser or operating system you are using. This information is collected in aggregate, but we may link it to your personal information through the use of cookies, as described above. We use Google Analytics and Adobe Analytics to measure how visitors interact with the content of our website. We also use a personalized Facebook audience to ask Facebook to show you ads that are personalized based on your interaction with our website or our social media pages, and to measure how you interact with those ads through the Facebook Pixel. All of these services use cookies and similar technology, such as web beacons, bookmarks, and embedded scripts, to record information about your interactions with our websites. Further information on how these services use such technologies can be found on the Google website and the Facebook website, as well as on the websites of the respective providers such as YouTube, Instagram, Twitter, etc. If you do not want us to collect data related to your visits to our website through Google Analytics, you can opt out by installing the Google Analytics opt-out browser add-on. You can opt out of your personalized Facebook audience by visiting the opt-out page of Facebook and other providers.

## **Why we process your personal data**

1. In order to establish and maintain responsible trade relations with you and to provide you with quality and continuous service.
2. To understand your needs, preferences and satisfaction with our services. We keep records of the products and services you receive from us, and we may request additional information so that we can serve you better.
3. To develop, improve, market or provide new products and services. For example, we analyse how you use our services and to what extent you are satisfied with them, so that we can better understand how to improve our services and increase your satisfaction.

4. To manage and develop our business and operations. For example, we analyse the patterns of use of our services so that we can manage them effectively and plan for future growth.
5. To protect our sites through video surveillance systems.
6. To meet the relevant legal and regulatory requirements.

### **Personal data processing principles:**

1. We will not process or disclose your personal data for purposes other than those listed above, except with your express consent for each additional purpose.
2. We will protect your personal data with the appropriate technical and organizational security measures.
3. We will take appropriate steps to protect the privacy of your personal information when interacting with third parties.
4. We will strive to protect your personal information and keep it up to date for the purposes set out above.
5. We will respond to all your requests to access your personal data within a reasonable time.

### **Where we store and transfer your personal data**

We store your personal data in electronic form on our own servers located on the territory of the Republic of Bulgaria with a high level of information security. We do not collect, process or disclose sensitive personal information, such as race, religion, or political affiliation. We may disclose your personal information outside of our group:

1. In case we sell or purchase a business or assets, where we may be required to disclose your personal information to the seller/buyer.
2. If our business is purchased by a third party, where the personal data of all our customers will be part of the assets that we transfer to the buyer. These transfers will be subject to the conditions of confidentiality and protection of your personal data and the conditions of confidentiality will be preserved and valid.

In all other cases, we will process, disclose or share your personal data only if required by law or when required in order to comply with and meet the requirements of public authorities acting within the relevant legal jurisdiction.

### **Your rights**

You have the following rights regarding the processing of your personal data:

1. Right to be informed.
2. Right to access.
3. Right to rectification.
4. Right to deletion.
5. Right to request to limit processing.
6. Right to data portability.
7. Right to object.
8. Rights in relation to automated decision making and profiling (where applicable).

We reserve the right to periodically update this Policy, and we therefore encourage you to review it periodically to determine how we process and protect your personal information. If you have any questions about our Privacy Policy or want to make a request and exercise rights regarding your personal data, please contact our Data Protection Officer by e-mail at [dpo@pmporovo.me](mailto:dpo@pmporovo.me) or write to us at: Pamporovo Resort, Hotel Orlovets.