

Privacy Policy

General

This Privacy Policy is intended at providing information on the collection, use and disclosure to third parties of personal data by **HOLBINA – TREI BIBANI SRL**, a company incorporated under Romanian law with its corporate seat at Bucharest, 1st District, 239 Calea Dorobantilor 6th Floor, Romania, registered with the Trade Register under no. J40/9190/2012, sole registration code (VAT no.) RO14674983 (hereinafter "**Holbina**"). Through the use of our website at www.holbina.ro (the "**Site**") or reservations with Holbina Resort, you are accepting and consenting to the practices set out in this Privacy Policy.

Holbina is aware that the security of your private information is an important concern. The protection of your personal data (hereafter referred to as the "**Data**") is highly important for us, data protection and the protection of your personal privacy being a priority for our business.

This Privacy Policy should be read in conjunction with the Terms and Conditions and the [Cookie Policy](#).

Collection and use of data

You can use our Site without disclosing your personal data. However, in case you would like to receive our newsletters or contact us for any reasons, you will be required to provide your personal Data during a registration process, such as: full name, phone number and e-mail, as the case may be, in case such Data is necessary for (hereinafter the "**Processing Purposes**"):

- (a) the performance of a Contract or in order to take steps, at your request, prior into entering a Contract (such as reservations and your stays with Holbina Resort);
- (b) sending the newsletters you subscribed for;
- (c) processing your inquiries.

Any personal Data communicated during the registration process will be processed by Holbina, as a data controller within the meaning of the General Data Protection Regulation, Romanian data protection laws or any applicable regulations.

Your Data shall be used only for the Processing Purposes for which they were originally collected. The Data may be processed for a legitimate purpose different than the Processing Purposes only if such legitimate purpose is closely related to the Processing Purposes. In case of any intention to further process the Data for a purpose other than the Processing Purposes under this Privacy Policy, we shall provide you, prior to that further processing, with relevant and detailed information on the envisaged processing.

You are required to provide Holbina with accurate and complete Data. Failure to do so shall constitute a breach of the Terms and Conditions and this Privacy Policy, which may result in immediate termination of (a) your reservation with Holbina Resort or (b) the supply of any services by Holbina. Furthermore, you expressly agree to maintain your registration information up to date and to ensure that it is accurate and complete at all times.

It is our policy that this Data will not be disclosed, shared with, sold or rented to third parties other than expressly provided under this Privacy Policy.

Your stay at Holbina Resort

When entering the premises of Holbina Reort, you will be required to register your stay using a registration form. Due to specific activities (tourism) and location of Holbina Resort (within the limits of the Danube Delta Natural Reservation) filling in the registration form is mandatory under the applicable regulations. Refusal to complete the registration form may prevent us to allow your stay at Holbina Resort.

Service and Support

You can ask for our assistance or address us any questions, comments, suggestions or concerns regarding the Site, the Resort, your stay at the Resort and any services you are offered for and during your stay or the processing of your personal data by contacting Holbina at the addresses under the “Contact” section of the Site. We ask you to provide all reasonable details so we may answer your request (such as full name, phone number and e-mail). Your data will be used exclusively in view of analyzing your request and, if accepted by Holbina, taking all necessary steps to answer such request.

Refusal to provide reasonable details will prevent Holbina to analyze or answer your request.

Newsletters

You can subscribe to our email newsletter service, by providing a valid e-mail address to which the newsletters should be sent in the “Newsletter” section on our Site.

You can unsubscribe from our email newsletter service at any time, by either sending an e-mail to paula@holbina.ro with your request for cancelation of your subscription or accessing the cancellation of subscription dedicated link existing at the end of each newsletter. The cancelation of your subscription shall not affect the lawfulness of processing based on your consent before its withdrawal.

Use of Cookies and Usage Statistics via Google Analytics

We use cookie technology for our Site, which allows us to make your browsing experience easier, for statistical purposes and for improving our Site. Usage of a cookie is in no way linked to any personally identifiable information while on our Site.

We are also using Google Analytics to analyse information gathered from visitors to the Site. This information allows Holbina to better understand the users of the Site, and how they use it. No personally identifying information is included in this type of reporting.

We do not use cookies to collect personal Data and use no technology that connects information collected by cookies to Data of our Site’s users.

For detailed information on the use of cookies and usage statistics via Google Analytics on our Website, as well as how you can opt out of certain types of this processing, disable the storage of cookies or remove registered cookies, please go to our [Cookie Policy](#).

Links

From time to time, our Site or the newsletters may contain links to other websites or resources on the Internet. Please be aware that these other websites or resources are not under Holbina’s control and you acknowledge and accept that Holbina is, under no circumstances, responsible or liable, directly or indirectly, for the privacy practices or actions of such other sites or their operators. The inclusion of any such link does not imply endorsement by Holbina or any association with its operators. We encourage you to be aware when you leave our Site and to read the privacy statements of each and every website that collects personal Data. The Privacy Policy you are currently reading applies solely to information collected by Holbina.

Recipients and Transfer of Data

Holbina may disclose personal data to third parties such as commercial partners of Holbina, acting as data processors for and on behalf of Holbina. (e.g. hosting, legal and financial advisors), with whom Holbina has made the necessary contractual agreements required by EU and national regulations. We

shall disclose data to third parties exclusively to the extent necessary to serve the applicable Processing Purposes for which your data is collected and processed. You expressly agree to the disclosure of your personal Data to these data processors.

Holbina may disclose the Data in order to comply with the law or in response to a request from a court or other legal authority, such as a warrant or a subpoena. Holbina might also share the information if we believe, in good faith, that it is necessary to prevent or address frauds, protect Holbina or to enforce the Terms and Conditions.

No data shall be transferred outside EU/ EEA.

Retention Period

Personal data collected and used will be stored for a period of 3 years after the termination of your stay or any other longer period imposed by the law, an applicable records retention regulation or public authorities.

Promptly after the applicable storage period has ended, the data shall be:

- (a) securely deleted or destroyed; or
- (b) transferred to an archive (unless this is prohibited by law or an applicable records retention regulation).

Personal data collected and used for creating your subscription to our Newsletter will be immediately deleted if you unsubscribe from our email newsletter service.

Security

As part of the administration of our Site, we have taken technical and organizational measures to ensure a level of security appropriate to the risks that are presented by processing, in particular from misuse or accidental, unlawful or unauthorized destruction, loss, alteration, disclosure, acquisition or access, willful or accidental manipulation, access by third parties, deletion and modification.

You shall be notified with respect to a data security breach, within a reasonable period of time following discovery of such breach, unless a law enforcement official determines that notification would impede a criminal investigation or cause damage to national security. In this case, notification shall be delayed as instructed by such law enforcement official. We shall promptly respond to your enquiries relating to such data security breach.

User's Rights

According to applicable data privacy regulations, you always have the right to obtain from Holbina confirmation (free of charge if once per year) as to whether or not Data concerning you is being processed and, where the case, access to the Data and the following information: purpose of the processing, Data concerned, recipients of the Data, storage period, your rights under the data protection regulations and the source of the Data (if it was not you providing your Data to Holbina.).

You also have the right to obtain from Holbina, without undue delay, the rectification of inaccurate Data.

You also have the right to request erasure of the Data or restriction of the processing provided conditions for such operation are met under the applicable law.

You have the right to Data portability (receiving your personal Data in a structured, commonly used and machine-readable format and transmitting those Data to another controller) and a right to object, on grounds relating to your particular situation, at any time to processing of your personal Data, including profiling, if the processing of personal data is based on legitimate interest pursued by Holbina or a third party.

You can object to the processing of your Data for direct marketing purposes by either sending an e-mail to paula@holbina.ro with your request for cancelation of subscription or accessing the cancellation of subscription dedicated link existing at the end of each newsletter.

Except for cases when processing of your personal Data is necessary for entering into, or performance of, a Contract, you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

You may exercise your rights freely and at any time, by sending a written and dated request accompanied by a proof of your identity using the contact details in the final section of this Privacy Policy.

We encourage you to contact us immediately if you believe that your personal Data was provided without consent, by sending us a written and dated request accompanied by a proof of your identity using the contact details in the final section of this Privacy Policy.

Changes

From time to time, we may need to update this Privacy Policy. When we do so, we will post those changes on our Site so you can always have access to details about the information we collect, how we use it, and under what circumstances, if any, we disclose it. Any such change, material or otherwise, shall enter into force with immediate effect at the publishing date on our Site.

If at any point we decide to use personal Data in a manner different from that stated at the time it was collected, we will notify you by email. You will have a choice as to whether or not we may use your Data in this different manner. Otherwise, if possible, we will use the Data in accordance with the Privacy Policy under which the Data was collected.

Contact Information

If you have any further questions about how we process your personal information, or if you would like to exercise any of your rights under this policy, please send us a written and dated request accompanied by a proof of you identity, using the following contact details:

For e-mail: paula@holbina.ro

In writing: Bucharest, 1st District, 239 Calea Dorobantilor 6th Floor, Romania

Requests for access, correction, restriction of processing or erasure must be in writing and are subject to applicable legal restrictions.

We shall ensure adequate steps are taken to address your request without undue delay and, in any event, within 30 (thirty) days of receipt of the request. The information shall be provided by electronic means where possible, unless otherwise expressly requested by you in writing.