

PRIVACY POLICY



CUSTOMER INFORMATION:

This Privacy Policy shall apply to all websites and commercial sites of **BT Collection** corporate group. The Policy covers the processing and protection of personal data in accordance with the provisions of REGULATION (EC) 2016/679 OF THE EUROPEAN PARLIAMENT AND THE COUNCIL from 27th April 2016, regarding the protection of physical persons in relation to the processing of personal data and the free movement of such data (Regulation).

We highly value the privacy of our clients and we employ high standards for protection of personal information. Our policies and procedures outline the type of personal information which we collect and receive, the circumstances under which we collect and receive it, its usage and storage, the sharing of certain types of personal information, under certain limited circumstances, the procedures which you need to follow should you have questions or requests, regarding your personal information and/or our policies and procedures, as well as contact information for addressing any queries or concerns, regarding our privacy policy, personal information and data storage.

In this Policy, **BT Collection** refers to registered company - BT Development Services AD, EIC 131290015, located at 1574 Sofia city, 3, Nikola Tesla Str., floor 9 - personal data (information) administrator and managing company of companies, owners of tour operators, hoteliers and ski zone operator namely: Balkantourist AD UIC 831652492 (touroperator), Win Travel EOOD UIC 200352676 (tour operator), Arbanassi Palace OOD UIC 204187193 (hotelier – hotel Arbanassi Palace, Arbanassi village), Borosport AD UIC 122002603 – operator of ski zone in Borovets resort, Grand Hotel Varna AD (hotelier – hotel complex Grand Hotel Varna, St.St.Konstantin and Elena resort), Rila Borovets AD UIC 832048438 (hotelier – hotel Rila, Borovets resort), Hotel International AD UIC 175072185 (hotelier – Hotel, Casino and Tower Suites. Zlatni Piasatsi resort).

In this Policy, **personal data** shall be understood to mean personal information, including full name, personal ID number and ID document, home address, e-mail address, phone number, personal preferences and any additional data provided by the client, at the time of service provision, which is not publicly available. It also includes information about the physical features and preferences of customers when such information is provided or recorded by us in the process of providing services to individuals.

HOW YOU CAN PROVIDE US WITH YOUR PERSONAL INFORMATION:

1. By making a reservation or using our services.
2. By subscribing to our Loyalty Customer Program.
3. By visiting our websites, social networks and other online platforms, including Facebook, Instagram, TripAdvisor, etc.

Outlined in detail below, is the information which we generally collect under any of the described circumstances, the reason why it is collected and how it is stored.

RESERVATIONS:

When inquiring about our services and/or booking with us, we will require your personal details, so we can identify, contact you and process your order. This information typically includes your full name, personal identification number and/or date of birth, nationality, address, telephone number, email address, credit card number, validity information and security code, (for payment of reserved services and for guarantee deposits when using the services), physical data - height, weight, number of shoes, skill level (providing ski / snowboard lessons and rental of equipment), photograph of your face purchase and use of lift cards), as well as language preferences. The listed information is necessary and required for the provision of tourist services under the Tourism Law of the Republic of Bulgaria and the financial and tax legislation in force in the country. If you chose to share such information with us, you may also include your personal preferences about the type of room/bed, you prefer etc. Eligibility to use third party loyalty programs would require proof of membership, such as but not limited to membership number. We occasionally offer special selective discounts based on certain criteria, such as age, in such cases we would require your date of birth and supporting documentation, such as personal ID or passport, at the time of registration.

BT Collection is a hospitality portfolio of hotels and tourist related services. Your personal information is shared with the third party – the parent holding company of the hotel in which you have chosen to stay or the company, which is to provide tourist services, related to your booking. All companies managed by BT Collection are bound by the same rules and regulations of this Personal Data Protection Policy.

Occasionally we offer packages or other services, which include third party suppliers. If your booking includes such a package or service, your personal information shall be shared with a third party service provider, only to the extent and scope needed for the provision of the service and order processing.

We may use the information provided by you to send you occasional promotions and information about the services provided by BT Collection, as well as selected third parties. Your data shall not be forwarded directly to such third parties and the process of receiving/forwarding such information, shall be managed by us.

Should you choose to receive such information, you can subscribe to our newsletter by selecting the Agree box on our website.

Should you choose to stop receiving such promotions and information, you may unsubscribe at any time by clicking on the Unsubscribe link within the email. Any email correspondence from us, shall contain instructions for unsubscribing and an Unsubscribe link.

HOW TO REGISTER ON OUR BT FAN LOYALTY CUSTOMER PROGRAM:

As a customer of BT Collection you have the opportunity to be part of our Loyalty Customer Program - BT Fan. The objective of this program is to provide a higher level of personalization and service quality to its members. To become a member you will need to provide additional personal information. The membership is free and may be terminated at any time. By choosing to sign up, you agree to the provision and use of your personal information, as provided in the General Terms of the Loyalty Customer Program. Please click on <http://www.btcollection.com/request> to view the General Terms of our Loyalty Customer Program.

WHEN YOU ACCESS ANY OF OUR WEBSITES OR SOCIAL MEDIA PLATFORMS AND OTHER SPECIALIZED WEBSITES:

We use “cookies” on our websites. “Cookies” are small fragments of data sent by our website and stored onto your hard drive, to enable record storage related to your browsing experience. The use of “cookies” is an industry standard and they are used ubiquitously on the internet. Our sites use “cookies” to identify visitors when they return to our websites. Identifying each customer, also allows us to personalize your online visit, making it a more useful and convenient experience.

It is also possible that we may revise our services and content, based on the information gathered above, in addition to information gathered, such as IP addresses – unique number

assigned to your computer when you use the Internet, pixel markers (or clear gifs), the type of Internet browser or operating system which you use. This information is collected aggregately but we can link it to your personal data, by the use of “cookies” as specified above.

We use Google Analytics and Adobe Analytics to measure how visitors interact with the content of our websites. We also use a personalized Facebook audience, which shows you Facebook ads, based on your interaction with our websites or our social media pages and measures how you interact with these ads. All these services use “cookies” and similar technologies such as web beacons, markers and built-in scripts, to record information about your interaction with our websites. Additional information about how these services use such technologies may be viewed on Google, Adobe and Facebook websites and also on the sites of the respective providers, such as YouTube, Instagram, Twitter, TripAdvisor etc.

If you do not permit data gathering as outlined above, related to your visits on our websites through Google Analytics, you may opt out by installing an add-on feature to the browser from Google Analytics. You may also opt out from the collection of data through Adobe Analytics by visiting Adobe Privacy Center. You may opt out from the Facebook personalized audience by visiting the opt out page of Facebook.

WHY WE PROCESS YOUR PERSONAL DATA – OBJECTIVES:

1. To establish and maintain responsible business relations with you and to provide you with relevant, personalized and quality service.
2. To identify your needs, preferences and level of satisfaction. We keep track of the products and services, which you receive from us and we may request additional information in order to improve our services. For example, we can register your preference for the type of room you require, accompanying tourist service etc. Additionally, we may request from you to fill out in-stay and post-stay feedback forms.
3. To design, improve and market or provide new products and services. For instance, we may analyze how you use our services and your level of satisfaction, in order to make improvements in the future.
4. To manage and develop our business and operations, by way of analyzing current services usage to improve effectiveness and relevance, for future development and growth.
5. To safeguard the public order in our facilities via video surveillance systems.
6. To comply with the requirements of the applicable laws.

RULES WE OBSERVE WHEN PROCESSING YOUR PERSONAL DATA:

1. We shall not process or disclose your personal data for any purposes other than the ones stated above, unless we obtain your expressed agreement, for each individual objective.
2. We shall protect your personal data with the respective technical and organizational safety measures.
3. We shall take all appropriate steps to protect the privacy of your personal data when we interact with third parties.
4. We shall do our best to keep your personal data safe and up-to-date for the purposes stated above.
5. We shall give you access to your personal data within a reasonable notice period.

WHERE WE STORE AND TRANSFER YOUR PERSONAL DATA:

We store your personal data in digital format on our company 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 data such as race, health status, religion or political and union orientation.

We may disclose your personal data outside of our group, in the following cases:

1. In the event we sell or buy a business or assets which requires us to disclose your personal data to the seller/buyer.

2. In the event that our business is bought by a third party, whereas the personal data of all our customers are part of the assets, which we transfer to the buyer. Such transfers shall be in line with the confidentiality and data protection terms of your personal information and all privacy conditions shall be maintained and in force.

In all other cases we shall process, disclose and share your personal data, only if required to do so by Law or when we are under the obligation to comply with government agency requirements, provided they act in accordance with their legitimate mandate.

YOUR RIGHTS:

You have the following rights with regard to the processing of your personal data:

1. Right to be informed.
2. Right to access.
3. Right to update and correct.
4. Right to delete.
5. Right to require limited processing.
6. Right to transfer data.
7. Right to objection.
8. Right to automated decision making and profiling (whenever applicable).

We reserve the right to update this Policy from time to time and we therefore encourage you to review it occasionally, so as to be informed about how we process and protect your personal data.

Should you have questions in relation to our Privacy Policy or wish to make a request or exercise a right in relation to your personal data, please contact our GDPR officer Ivailo Cvetkov at icvetkov@bt-ds.com or write to us at the following address: 1574 Sofia, 3 Nikola Tesla St., floor 9.