

# Red Castle Ltd. Privacy Statement

The Magic Castle Hotel – Sofia, values you as our guest and recognizes that privacy is important to you. In the following Privacy Statement, you will become familiar with how we collect, why we collect and how we use and disclose data.

In summary we collect data in the following ways:

- **Online** - through our website booking application, our social media pages that we own and control and through email messages that you send us
- **Offline** - when you visit or stay as a guest at our hotel, or through other offline interactions
- Through our **Business Partners**, such as OTA (Online Travel Agencies), TA (Travel Agents) and other Corporate Booking Agents

## 1. What is Personal Data.

“**Personal Data**” are data that identify you as an individual. Throughout your journey as a guest at our hotel, we collect Personal Data in accordance with law, such as:

- Name, Address, Contact info: telephone number & e-mail address
- Credit and debit card number or other payment data
- Data from: Passport, ID Card, Visa or other government-issued ID
- Personal Preferences, collected from previous stays with us, such as your favorite room type, services and purchased goods
- Publicly available Social media ID, profile photo and other data
- Video data from our security cameras in public areas, such as hallways, lobby, yard and parking garage located in our properties

When you submit Personal Data on other people to us (e.g. if you make a reservation for another guest), you agree that you have the authority to do so and that you permit us to use the data in accordance with this Privacy Statement.

## 2. How we collect Personal Data.

We collect Personal Data in a variety of ways:

- **Online** - We collect Personal Data when you make a reservation or purchase services through our website, when you e-mail us with reservation request or a question or when you connect with us or post to social media pages.
- **Offline** - We collect Personal Data when you stay at our hotel and register as a guest or when you visit our property and make a reservation for future accommodation. We also collect Personal Data when you make a reservation over the phone or communicate with us by email or other messaging apps.
- Through our **Business Partners**. We collect Personal Data from companies with whom we partner to provide you with accommodation and services. Examples of Business

Partners include Online Travel Agents (Travel booking platforms), Tour Operators and Corporate Booking Agents.

### **3. Why we collect your Personal Data.**

We need your Personal Data, so we can fulfill your reservation and provide services you requested.

- a) In order to facilitate your reservation, collect payment and send you important information prior to your stay, we need to collect the relevant Personal Data.
- b) In order to comply with the law on foreigners in the Republic of Bulgaria, Art. 28 (4) (Amended, SG No. 36/2009) *"A person carrying out a hotel business, or his employee at the time of accommodation of a foreigner, registers him immediately special register. Information about accommodated foreigners is provided on a daily basis by that person within 06.00 hours at the administrative control service of foreigners or in the regional government of the Ministry of Interior works at the location of the hotel."*
- c) In order to comply with Tourist Act, Art. 116. (amend. - SG 75/16) (1) *"Persons engaged in hotel management shall keep a register of the accommodated tourists which shall include the data approved by the Minister of Tourism and published on the website of the Ministry of Tourism."*

For the above two reasons (lines "b" and "c") we must disclose the following Personal Data: Your Name, Date of birth, Nationality, Gender, Passport, Visa or ID numbers.

We use your Personal Data for our legitimate business interest, so If you do not provide the data that we request, or prohibit us from collecting such data, we may not be able to provide the requested Services.

### **4. How we use your Personal Data**

We use Personal Data in the following ways:

- To confirm your reservation and stay
- To process your payment
- To send you important information prior to your arrival in Sofia
- To assist you with and/or send you information about places you plan to visit during your stay
- To provide you with other services you requested, such as shuttle pick-up

### **5. Disclosure of Personal Data**

Please note that we do not disclose your Personal Data to any Third-Party Advertisers, we disclose your Personal Data only for the purpose of providing you services you requested.

- In order to comply with the law, we disclose your Personal Data from your government issued ID, Passport or Visa and the duration of your stay at our hotel to government authorities in Bulgaria

- We disclose Personal Data to third party providers in order to arrange: shuttle pick-up, rental car, sight-seeing or other requested services by you, the data we disclose are your names and flight information (for airport pick-up)
- In rare cases we will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of the Magic Castle Hotel, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

## **6. How we retain your Personal Data**

We will retain your personal data for the necessary period of time to comply with laws or to facilitate your accommodation and fulfill requested services.

## **7. Security**

We apply all possible technical and administrative measures to protect your Personal Data. As you know there is no storage system or data transmission in the world that is 100% secure, but what is in our hands, we handle carefully.

## **8. Sensitive Personal Data**

Unless needed or specifically requested, when you communicate with us (Online or Offline), please do not disclose Sensitive Personal data, such as: social security number, racial or ethnic origin, religion, ideological or other beliefs, health, political opinions, biometric or genetic characteristics and criminal background.

## **9. Certification of Red Castle as Personal Data Administrator**

Red Castle Ltd. Is registered administrator of Personal data with №1408872

## **10. Useful links to laws and acts of the Republic of Bulgaria**

<http://www.mrrb.government.bg/en/tourism-act/>

[https://investbg.government.bg/files/useruploads/files/foreigners\\_in\\_the\\_republic\\_of\\_bulgaria\\_act\\_20140722.pdf](https://investbg.government.bg/files/useruploads/files/foreigners_in_the_republic_of_bulgaria_act_20140722.pdf)