



# LUXURY VILLAS KABAKUM

## GOLDEN SANDS AREA, VARNA

### PRIVACY POLICY AND DATA PROTECTION

Our Property recognises the importance of protecting your privacy and our policy is designed to assist you in understanding how we collect, use and safeguard the personal information you provide to us and to assist you in making informed decisions when using our booking engine. We hold the privacy of your personal information in the highest regard.

**Data Controller:** Our Property, as data controller, collects and processes personal data for the purposes of bookings, to meet your request, and for purposes of guests' management, payments, billings and marketing/promotional actions. Your data may be transmitted to other controlled or related companies. The data shall not be publicly disclosed.

**Data Processor:** Our booking engine provider is authorized to act as the "processor" of personal data in behalf of us.

### INFORMATION AND CONSENT

This Privacy Policy describes how we collect, use and safeguard the personal information you provide to us about you (hereinafter, the "User"). By accessing our booking engine you agree to our privacy practices as set out in this privacy statement. We may change this policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version.

You may exercise your rights concerning the protection of personal data (access, rectification, amendment, deletion, objection to the handling of your data, etc.), by contacting our Property (**Data Controller**) at the following contact details:

- Luxury Villas Kabakum
- Address: Golden sands Area
- Telephone: +359 884 433 650
- E-mail: reservations@kabakum.bg

### WHAT PERSONAL INFORMATION DO WE COLLECT?

We can help you book directly the perfect accommodation in our Property only with the provision of some of your personal data. When you book directly with us, we ask for your First Name, Last Name, Mobile Phone Number and Email Address and your payment information as mandatory information. Optionally we ask you details such as your Address, City, Country, ZIP/Postal code, Title, Date of birth and flight details.

You can register and create a user account in our booking engine. We use the information you give us to administer this account, allowing you to do a number of useful things, like making your bookings, manage your bookings, take advantage of special offers for members, make future Reservations easily and manage your personal settings.

You may register and/or access through a third-party account (Gmail) or Social network (Facebook), in that case we collect and access certain information of the User's profile, solely for the purposes indicated above.

If you are under 16, you MUST have your parents' consent before using the services of this site.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection.

### HOW DO WE USE THE INFORMATION THAT YOU PROVIDE TO US?

First and foremost, we use your personal data to complete, manage and administer your online Reservation.

Our Property, as data controller, collects and processes your personal data for the purposes of

- Managing your bookings made and your requests and preferences
- Administering our business activities, provisioning of services and monitoring the use of services
- Managing payments (where applicable) and billings/invoices
- Managing and registration to our Membership and Loyalty and Rewards programs (where applicable)
- Managing marketing actions and communications by electronic and/or conventional means
- Managing surveys regarding the quality of the services provided by us

Occasionally, we may also use the information we collect to notify you about new services and special offers we think you will find valuable. You may notify us at any time if you do not wish to receive these offers.

Furthermore, such information may be shared with others on an aggregate basis.

### PRIVACY AND PROTECTION OF PERSONAL DATA

Our company will in no way disclose, publish, sell or exchange your personal data and information entrusted to us. In extreme cases, we may also disclose your personal data to third parties to:

- Comply with any court order or other legal obligation or public authority or when data is requested by government or law enforcement authorities;
- Enforce or apply our terms of use and any other agreements;
- Protect the rights of our property. This may include exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### DATA RETENTION

We store your personal data on our systems for as long as is necessary for the provision of the relevant services or to fulfil the purposes described in this Privacy Policy. We may also be required to retain certain types of data for a longer period in order to comply with legal obligations or retain data in anonymous form for longer for statistical purposes.



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### USE OF COOKIES

Access to our site involves the use of cookies. Cookies are small files of information stored on the browser of each user so that the server can recognize certain information that only the server can read. They help us to improve and deliver a better and more personalised service by enabling us to: a. Store information about your search requests, preferences, allowing us to better customise the services according to your individual interests; b. Process and Speed up your searches; and c. Recognize you when you return to the website.

You can set your browser to refuse cookies. However, you may not be able to enjoy all the facilities or book via our website if you do so.

### IP ADDRESSES – OTHER INFORMATION WE COLLECT

When you visit our booking engine we automatically collect the following data as part of demographic and profile data known as traffic data:

- Technical information, including the Internet Protocol (IP address) that is used to connect your computer to the internet, browser type and version, time zone settings, and operating system and platform, Information concerning your visit, including the full Uniform Resource Locators (URL), products you viewed or searched for, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers) and methods used to browse away from the page.

We will use the above information that we collect about you as part of our efforts to keep our website safe and secure and for improving our website to ensure that content is presented in the most effective manner.

### DATA PROTECTION

Any personal data collected will be processed in a fair, legal, transparent and GDPR (**General Data Protection Regulation**) "**REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**" compliant way. GDPR compliant third party services may be used for data processing.

Company name	"NSO SOFIA" LTD
Bulstat	BG202077862
Address	city Sofia, zhk Zona B5, 10 / B, floor 9, ap.113
Owner of company	Julian Todorov
Bank details	DSK Bank BIC: STSABGSF IBAN: BG41STSA93000025696107