

Privacy and Cookie Policy

DA0002

Code:	DA0002
Version:	1
Date of version:	18 April 2020
Created by:	Business Manager
Approved by:	Business Manager
Confidentiality level:	Public

Table of Contents

1. Introduction	3
2. About us	3
3. What information we collect from you	3
3.1. Name and contact details	3
3.2. Digital data	3
3.2.1. Social media	3
3.2.2. Our website	4
3.2.3. Our office and premisses	4
3.2.4. Payment data	4
3.3. Sensitive personal data	4
3.4. Children's personal data	5
4. Why we collect your personal data and what we do with it	5
5. Who we share your personal data with	5
6. International transfers of information	6
7. Legal bases for processing personal data	6
7.1. Performance of a contract	6
7.2. Legitimate interests	7
7.3. Consent	7
8. How you can control your data	7
9. How we protect your data	7
10. Your data rights	7
10.1. Right to be informed	8
10.2. Right of access	8
10.3. Right of rectification	8
10.4. Right of erasure	8
10.5. Right to restrict processing	8
10.6. Right to data portability	8
10.7. Rights related to automated decision-making	9
10.8. Right to object	9
11. Privacy policies of other websites	9
12. Changes to this policy	9
13. How to contact us	9

14. How to contact the appropriate authority	10
15. How we contact you	10
15.1. Marketing	10
15.2. During the reservation process	10
15.3. Business to Business	11
16. Cookies	11
16.1. What are cookies?	11
16.2. Types of cookies	11
16.3. How to manage cookies	12

1. Introduction

Domum Apartments SRL takes your privacy seriously and we are committed to ensuring the privacy and safeguarding of your data. Our Privacy and Cookie Policy describes how we collect and process your personal data in a format that is easy to understand. Please read the following information carefully to understand how we treat your data and what you can expect of us as a data controller.

2. About us

We are Domum Apartments SRL (company number 37331488) and our registered office is 24 Iuliu Maniu Street, Ap. 1, 400095 Cluj-Napoca, Cluj, Romania.

Domum Apartments offers serviced apartments based on your specific requirements and to do this we need certain information from you.

3. What information we collect from you

3.1. Name and contact details

Our business is built around providing a service to our clients, and we can't provide this service without taking some of your personal data. When you contact us we only take what's absolutely necessary to communicate with you throughout the reservation process and to successfully reserve an apartment for you. For us to do this we'll need your full name and contact details such as your phone number and email address.

We may also need to collect the names of other guests, providing they are over 18 years of age. We also collect details about your accommodation requirements such as budget, length of stay and accommodation type. If your employer uses our services to book accommodation for you, we may collect this information from them, rather than directly from you.

3.2. Digital data

3.2.1. Social media

When you interact with us on social media platforms such as Facebook, WhatsApp, Twitter, Instagram or LinkedIn we may also obtain some personal information about you. The information we receive will depend on the privacy preferences you have set on each platform

and the privacy policies of each platform. To change your settings on these platforms, please refer to their privacy notices.

We use these platforms to communicate news, stories, blog posts and other relevant information in the industry and about our company. Sometimes we run competitions or ask for your replies and in these instances we may need to make contact with you. For example, if you win a competition and we're contacting you about your prize. Your personal data will be treated according to this privacy policy and only used as necessary for our legitimate interests in dealing with your correspondence or administering the competition you have entered.

3.2.2. Our website

When you browse our website, we collect some cookie information regarding your use of the website, and this is used to help us improve the service we deliver. Cookie information can include your IP address, the browser you are using and your language settings. The IP address allows your computer to communicate over the internet and connect to our website and it can also show us where in the world you're browsing from.

3.2.3. Our office and premisses

If you visit our offices, we may collect video, audio and still images via security cameras located in public areas such as entrances and hallways.

3.2.4. Payment data

Domum Apartments does not store any of your payment data apart from the bank account number which we use to pay back your deposit at the end of your stay or to perform any kind of refunds. Other payment details are supplied directly to Banca Transilvania by yourselves when paying the rent or any other payments by bank transfer.

Other tracking technologies are sometimes used, for example, a web beacon or tracking URL. These technologies can be used to retrieve information from your device such as your operating system, or help us understand from which website you have been referred (e.g. Google). These are wholly referred to as 'Cookies' and are detailed below.

3.3. Sensitive personal data

We do not collect 'sensitive' or 'special category' personal data such as information revealing racial or ethnic origin, religious or philosophical beliefs and political opinions, trade union membership, genetic or biometric data, information concerning health or data concerning a person's sex life or sexual orientation.

This is a simple overview of the information we collect from you. If you'd like to know more, further information is available below.

3.4. Children's personal data

You must be over 18 years of age to reserve an apartment with Domum Apartments. If children are travelling with you, we will need to know their age but we do not require their personal details and you will never be asked for their information at any stage in the reservation process. We may ask simple questions to help form your requirements, for example, if you require a cot or a high-chair.

4. Why we collect your personal data and what we do with it

We primarily collect your personal details to service your accommodation request and this can involve the following communications:

- Providing you with accommodation options via email
- Communicating with you about your requirements via phone and email
- Completing and administering your reservation via email

We keep a copy of your correspondence and details of your reservation to enable us to manage the reservation process. This data is further kept for up to 6 years after your last booking for the purpose of auditing and to comply with regulatory bodies such as the ANAF.

Furthermore, if you have opted-in when making your enquiry, we will send you marketing materials such as our monthly newsletter that details promotions, special offers and discounted rates. Depending on your preferences, we may send you further correspondence from time to time.

The CCTV images collected at our offices are used for business security, health and safety and fraud monitoring. We collect this data to comply with our insurance obligations and to keep our premises and data safe. CCTV data is stored for 10 days unless required for criminal or insurance investigations in which case it's held for as long as necessary to fulfil that investigation.

We will retain data for no longer than necessary for the purposes for which it was collected, taking into account guidance issued by the ANSPDCP (the National Supervisory Authority For Personal Data Processing).

5. Who we share your personal data with

We do not share your personal data with any other people or third parties. We may only have to disclose your information in the event that we sell the business, introduce or acquire another

business, need to establish, make or defend a legal claim, or if we are under a duty to disclose personal data to comply with legal obligations. We may also use third party service providers (such as IT and technology services) who will store or use your data, but only on our instructions and subject to strict data protection requirements.

We will not, under any circumstances, sell or share your personal data with any third party for their own purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

6. International transfers of information

Your information is normally kept within Romania or within the European Economic Area (EEA) and this is a priority for Domum Apartments when selecting where we host and use your information.

On some occasions, we may have to use the services of a supplier outside the EEA, which means that your personal information is transferred, processed and stored outside the EEA. You should be aware that, in general, legal protection for personal information in countries outside the EEA may not be equivalent to the level of protection provided in the EEA.

However, when this occurs, we will only ever use highly reputable suppliers that have contractual clauses about the high standard of data processing, and meet all requirements that your information is looked after to a standard as if it were in the EEA. If and when this occurs, usually this is a company in the USA.

When we transfer your personal information and process it in the USA, we do so in accordance with the EU-U.S. Privacy Shield Framework and the European Commission approved standard contractual clauses. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

7. Legal bases for processing personal data

To process your data we rely on the following legal bases:

7.1. Performance of a contract

We need the personal data you supply to execute our part of the contract between us “the service provider” and you “the client”. If you ask us to make a reservation, we will use your information to complete and administer your reservation to satisfy our part of the contract as a service provider.

7.2. Legitimate interests

We use your personal data to service your requests and send you information relevant to your reservation. We may contact you to suggest alternative options when your chosen apartment is not available or to ask if you would like to extend your current reservation. If you are a guest, or your employer is making the booking, we use your information as necessary for our legitimate interests in carrying out our contract with the client who made the booking.

7.3. Consent

We will ask for your consent to send you direct marketing content containing relevant information, special offers, exclusive rates and promotions. We may also send other marketing materials and these are detailed further below.

8. How you can control your data

You have the right to access and to review the personal data we hold for you. You can request an overview of this data by emailing info@domumapartments.com. When emailing, please write 'Personal information request' in the subject line so we're able to expedite the process, together with copies of two separate identification documents which provide photo identification and confirm your address, such as a passport, driving licence, or utility bill. More information about your rights can be found below.

9. How we protect your data

We continuously review and update our website data security in accordance with legal requirements and web best practices. We take every reasonable measure to ensure your data is secure and only accessed by those requiring it to process your reservation.

When you make a reservation and enter payment details, this information is encrypted. This helps ensure your data is not transferred in a readable format and can't be unlawfully accessed in transit.

10. Your data rights

As a user of our service, you have rights as an individual which you can exercise in relation to the information we hold about you.

10.1. Right to be informed

You have a right to be informed in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this policy. If you require any further information about how we use your personal information, please let us know.

10.2. Right of access

You can request access to your personal information by making a 'Personal information request'. We can tell you what information we hold about you, why we are holding it and who it may be shared with. If it's been shared, this will only have been with a property that you have made a reservation with. Further to this, you may request a full copy of the personal information we hold for you which we will send to you.

10.3. Right of rectification

If you believe our records of your personal information are inaccurate, you have the right to ask us to update those records. You can also ask us to check the personal information that we hold about you if you are unsure whether it is up to date or not.

10.4. Right of erasure

At your request we will delete your personal information from our records. We will only retain your data if we're under a legal obligation to do so or we need to keep it to establish, exercise or defend a legal claim, and you will always be informed in these scenarios.

10.5. Right to restrict processing

You have the right to ask us to restrict the processing of your personal information if there is disagreement about its accuracy or whether our use is legitimate or not. We only use your data to process your reservation and if you request us to restrict processing then this will take place after your reservation and stay has been completed. Further to this, if you feel your data has been processed incorrectly or unfairly then you have the right to object to the processing of this data.

10.6. Right to data portability

If you want us to transfer your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means, you can ask us to do so.

10.7. Rights related to automated decision-making

Where we take automated decisions in relation to your personal information with no human involvement you have the right to ask us for human intervention or to challenge any such decision.

10.8. Right to object

You have the right to object to processing where we are: (i) processing your personal information on the basis of the legitimate interests ground and we have no compelling reason we can demonstrate to continue with that processing; (ii) using your personal information for direct marketing, or; (iii) using your personal information for statistical purposes.

In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another compelling legitimate interest in doing so.

You can do any of the above by emailing info@domumapartments.com.

If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with the relevant national data protection supervisory authority (see below).

11. Privacy policies of other websites

The Domum Apartments website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

12. Changes to this policy

Our privacy policy may change without notice. The current version was updated April 2020.

13. How to contact us

For any further information you can contact us:

- By email at: info@domumapartments.com

- By phone on: see phone numbers on website <https://domumapartments.com/contact-us>
- Or write to us at Domum Apartments SRL, 24 Iuliu Maniu Street, Ap.1, 400095 Cluj-Napoca, Cluj, Romania

14. How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Domum Apartments has not addressed your concern in a satisfactory manner, you may contact ANSPDCP (the National Supervisory Authority For Personal Data Processing - <https://www.dataprotection.ro/>):

- By email at: anspdcpc@dataprotection.ro
- By phone on: + 40 (0)318 059 211
- Or write at: ANSPDCP, 28-30 G-ral Gheorghe Magheru Bld., District 1, 010336 Bucharest, Romania

15. How we contact you

15.1. Marketing

With your consent, we will send you marketing materials that support our business and are suited to your requirements. Your consent will be explicit and you will know what types of marketing materials you are going to receive. You can manage the communication you receive from us by selecting your preferences on our website. You may receive the following types of marketing emails from us:

- Monthly newsletters – A newsletter detailing promotions, special offers, discounted rates and other news relevant to your reservation.
- Company news – Keeps you up to date with our company and industry news.
- Competitions – From time to time we run competitions that give you the chance of winning prizes such as free stays in our apartments.

You can withdraw your consent at any time by contacting us at the email address listed at the end of this privacy policy. Consent can also be withdrawn by using the 'Unsubscribe' button that we include at the bottom of all our marketing communications.

15.2. During the reservation process

Ensuring you have the best possible stay is important to us so we may also contact you during your reservation to check that everything is as expected. We may also ask if you're interested in extending your reservation or if you have any future requirements that we can help with. If during the reservation process the apartment you have chosen isn't available, then we may contact you to discuss alternative options.

15.3. Business to Business

If you're within our key industries then we may reach out to gauge your interest in our services. If you receive communication from us and don't wish to receive more, then simply hit the 'Unsubscribe' button at the bottom of the email.

16. Cookies

16.1. What are cookies?

Our website uses cookies for various web functions, and to help improve the user experience.

A cookie is a small data file stored on your computer that comes from the web browser you're using. It can have a variety of uses and functionalities including storing information about your preferences, speeding up your searches and recognising you when you re-visit. Cookies are also used to track overall visits and visitor location. This helps us identify visitor numbers and patterns.

Some cookies have a session-limited lifespan and are removed when you close your browser; whereas permanent cookies last a lot longer and sometimes indefinitely.

16.2. Types of cookies

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of parts of our websites. They include, for example, cookies that enable you to log into secure areas of our websites or make use of reservations services. Strictly necessary cookies do not require consent as they provide functionality as requested by the browser.
- Performance cookies. They allow us to recognise and count the number of visitors to our web pages and see how these visitors navigate around our site. This helps us to improve the way our website works by optimising our page layouts, search tools and general usability.
- Functionality cookies. These are used to recognise when you return to our websites in the future. This enables us to personalise our content for you, greet you by your name and remember your preferences such as language settings and time zone.
- Targeting cookies. These cookies record your visit to our websites, the pages you have visited and the links you have followed. We will use this information to make our websites and the advertising we display more relevant to your interests.

16.3. How to manage cookies

Most internet browsers automatically accept cookies unless you change your browser settings. If you wish to restrict, block or delete the cookies which are set by any websites, you can generally do this through your browser settings. These settings are usually found in the 'options' or 'preferences' menu of your internet browser.

Please note however that if you set your internet browser preferences to block all cookies, you may not be able to access all or parts of our website.

If you would like to read more information about cookies, or would like to find out about how to disable them, please visit <http://www.aboutcookies.org/>

If you would like more information about the specific cookies our website uses, please contact info@domumapartments.com.