

STELLAR

Personal Data Processing Notice for Hilton Hotel Guests Using the Stellar Club

1. Personal data controller

The controller of your personal data is WELL FITNESS SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ, based in Wrocław, ul. Jana Długosza 74, 51-162 Wrocław. For matters related to personal data, please contact us at the above address or by email atrodo@wellfitness.pl.

You can contact us in the following manner:

- by letter to: Well Fitness sp. z o.o., ul. Jana Długosza 74, 51-162 Wrocław
- via email at rodo@wellfitness.pl

2. Purposes of personal data processing and legal basis for the processing

We process your personal data for following purposes:

- enabling you to use our services, including verifying your status as a Hotel Guest,
- pursuing our legitimate interests consisting of:
 - o identifying you as a person using our services,
 - o examining notifications, including exercising possible claims or defending claims,
 - o providing security (CCTV),
- fulfilling obligations under the law, in particular in the financial and accounting area.

Additionally, if you give your consent, we can process your data for the following purposes:

- marketing of third party products and services;
- promotion activities using your image;
- enabling you to participate in activities with a trainer, including ensuring your safety exercising proper supervision during classes by reviewing your health information;
- providing the data to our partners with whom we cooperate, e.g. for the use of special deals and discounts.

3. Source and categories of data processed

In most cases, we obtain your data directly from you; however, at times, we obtain your data from a third party that funds the use of our services, e.g. the Hilton Hotel. We may process your identification details, contact details, health data (if you have given your consent), image, data from the monitoring system, information about the way you use our services, data relating to the use of mobile applications.

4. Storage period for your personal data

In principle, we will store your data:

- for the period of using our services,
- once you have ceased using our services, in particular in connection with tax law obligations and until the statute of limitations for contractual claims has run out as defined in the Civil Code,
- in the case of the processing of data based on our legitimate interests – until objection to the processing,
- until you withdraw your consent to personal data processing where the data are processed on the basis of the consent,
- up to 30 days – in connection with the CCTV.

5. Recipients of your personal data

We may transfer your data to entities that provide us with various types of services, including in particular IT, hosting, accounting, consulting, debt collection and payment intermediation service providers. Such entities may process your data on the basis of an agreement with us and only in accordance with our instructions. We may also share information about you with entities authorised by law, e.g. law enforcement agencies, if warranted. If you have given your consent, we may also share your data with our partners, e.g. when you use promotions, loyalty programmes and discounts.

6. Transfers of data to third countries (outside the European Economic Area)

In order to ensure the top quality of our services, we use other suppliers, e.g. in terms of IT support. As a result, your personal data be transferred outside the European Economic Area. We assure you that, in this case, the transfer of data will be based on an appropriate contract between us and the entity, containing standard data protection clauses adopted by the European Commission, or based on a relevant decision of the European Commission.

7. Your rights related to the processing of personal data:

- the right to object to the processing of data based on the legitimate interest,
- the right to access your personal data,
- the right to request the rectification of your personal data,
- the right to request the erasure of your personal data – we will be able to erase the data if we do not have a purpose for their further processing
- the right to request restriction of the processing of your personal data,
- the right to transfer your personal data, i.e. the right to receive your personal data from us, in a structured, commonly used, machine-readable computer format. You may transmit the data to another controller or request that we transmit your data to another controller. However, we will do so only if such transmission is technically possible.

Please, contact us to exercise the aforementioned rights (contact details in point 1).

If you suspect that your data are being processed improperly, you also have the right to lodge a complaint with the data protection supervisory authority, i.e. the President of the Personal Data Protection Office.

Right to withdraw consent to the processing of personal data If your data are processed based on your consent, you have the right to withdraw it at any time without detriment. It does not affect the lawfulness of processing performed prior to the withdrawal.

8. Obligation to provide data

Providing the data required to use our services is voluntary; however, failure to provide the data will prevent you from entering the club.