

## PRIVACY AND DATA PROTECTION POLICY

Blu Bay Hotel Sozopol / "MC Invest" Ltd. recognizes the importance of protecting your privacy, and our policy is designed to help you understand how we collect, use, and protect the personal information you provide to us, and to assist you in making informed decisions when using our reservation system. The privacy of your personal information is of utmost importance to us.

Data Controller: Blu Bay Hotel Sozopol, as the data controller, collects and processes personal data for the purposes of reservations, to respond to your request, and for the purposes of guest management, payments, invoicing, and marketing/promotional activities. Your data may be transferred to other controlled or affiliated companies. The data is not disclosed publicly.

Data Processor: Our reservation system provider is authorized to act as a "processor" of personal data on our behalf.

### INFORMATION AND CONSENT

This privacy policy describes how we collect, use, and protect the personal information you provide to us about yourself (hereinafter referred to as "User"). By accessing our reservation system, you agree to our privacy practices as set out in this privacy statement. We may update this policy from time to time. You should check this policy regularly to ensure you are aware of the latest version.

You may exercise your rights regarding the protection of personal data (access, correction, modification, deletion, objection to the processing of your data, etc.) by contacting us (the Data Controller) at the following contact details:

Blu Bay Hotel Sozopol +359 55 045 000 reservations@blu-bay.com https://blu-bay.com 15 Kraybrezhna str. 8130 Sozopol Bulgaria

### WHAT PERSONAL INFORMATION DO WE COLLECT?

We can assist you in booking the perfect accommodation in our hotel by collecting only part of your personal data. When you book directly with us, we require your first name, last name, mobile phone number, email address, and payment information as mandatory information. Optionally, we ask for details such as your address, city, country, postal code, names, and date of birth.

You may register and create a user account in our reservation system. We use the information you provide to manage this account, which allows you to do a variety of useful things, such as making your bookings, managing your reservations, accessing member-only special offers, easily making future reservations, and managing your personal settings.

You may also register and/or log in through a third-party account (Gmail) or social network (Facebook), in which case we collect and access certain information from the user profile solely for the purposes stated above.

If you are under 18 years of age, you MUST have parental consent before using the services of this site.

Other collected personal data may be described in other sections of this privacy policy or by specific explanatory text at the point of data collection.

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

Primarily, we use your personal data to complete, manage, and administer your online reservation.



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Blu Bay Hotel, as the data controller, collects and processes your personal data for the purposes of:

- Managing reservations and your requests and preferences
- Administering our business activities, providing services, and monitoring the use of services
- Managing payments (where applicable) and invoicing
- Managing and registering you in our membership, loyalty, and rewards programs (where applicable)
- Managing marketing activities and communications via electronic and/or conventional means
- Conducting surveys about the quality of our services

We may also occasionally use the information we collect to notify you about new services and special offers that we believe will be of value to you. You can notify us at any time if you do not wish to receive these offers.

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

# PRIVACY AND PROTECTION OF PERSONAL DATA

Our company will not, in any way, disclose, publish, sell, or trade your personal data and information entrusted to us. In extreme cases, we may also disclose your personal data to third parties in order to:

• Comply with a court order, legal obligation, or public authority request, or where data is requested by government or law enforcement authorities;

• Enforce or apply our terms of use and any other agreements;

• Protect the rights of Blu Bay Hotel. This may include sharing information with other companies and organizations for the purpose of fraud protection and credit risk reduction.

### DATA RETENTION

We store your personal data in our systems for as long as necessary to provide the respective services or to fulfill the purposes described in this Privacy Policy. We may also be required to retain certain types of data for a longer period to comply with legal obligations or to retain data in anonymized form for statistical purposes.

### USE OF COOKIES

Access to our site involves the use of cookies. Cookies are small files of information stored in each user's browser, allowing the server to recognize certain information that only the server can read. They help us improve and provide better, more personalized service by allowing us to:

a) Store information about your search requests and preferences, which allows us to better tailor services 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 functionalities or make reservations through our website if you do so.

# IP ADDRESSES – OTHER INFORMATION WE COLLECT

When you visit our reservation system, 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 used to connect your computer to the Internet, browser type and version, time zone settings, operating system, and platform;

Information regarding your visit, including full Uniform Resource Locators (URLs), products you viewed or searched for, page response times, duration of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.



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

### DATA PROTECTION

All collected personal data will be processed in a fair, lawful, transparent, and GDPR-compliant manner – "REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL". GDPR-compliant third-party services may be used for data processing.

Company Name: MC INVEST Ltd. VAT Number: BG115576113 Address: 6 Belgrad St., Plovdiv, Bulgaria Managing Director: Anastasia Nakova

Bank Details – BGN Account for Hotel Blu Bay 5 in Sozopol\* MC INVEST Ltd. IBAN: BG39UBBS88881000929309 BIC CODE: UBBSBGSF UNITED BULGARIAN BANK PLC – PLOVDIV

Bank Account in EURO for Hotel Blu Bay 5 in Sozopol\* MC INVEST Ltd. IBAN: BG64UBBS88881400929311 BIC CODE: UBBSBGSF UNITED BULGARIAN BANK PLC – PLOVDIV