

These data processing and protection rules ("rules") provide you with all the necessary information on how and why we handle your personal data, how you can contact us if needed, and what your rights are regarding the processing of your personal data. The rules regulate the details, scope, purpose, legal basis, and methods of protection in the processing of your personal data, as well as the personal data of individuals ("data subjects") processed in connection with your reservation and short-term accommodation in our ClearVueHome apartments.

Principles of Processing Your Personal Data:

The operator of the ClearVueHome.com website, Vladimír Mikolaj, and the entire ClearVueHome team adhere to the following six fundamental principles of personal data processing and are responsible for ensuring that the processing of personal data complies with these principles. The principles of personal data processing are:

I. Principle of Lawfulness, Fairness, and Transparency – Personal data is processed lawfully, fairly, and transparently in relation to the data subject;

II. Principle of Purpose Limitation – Personal data is obtained for specific, explicitly stated, and legitimate purposes and is not further processed in a manner incompatible with these purposes. Further processing for archival purposes in the public interest is not considered incompatible with the original purposes;

III. Principle of Data Minimization – Personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed;

IV. Principle of Accuracy – Personal data is accurate and, if necessary, kept up to date, and we have taken all necessary measures to ensure that inaccurate personal data, considering the purposes for which it is processed, is erased or rectified without delay;

V. Principle of Storage Limitation – Personal data is kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;

VI. Principle of Integrity and Confidentiality – Personal data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

1 Introductory Provisions

- 1.1 In the processing of personal data, we comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons concerning the processing of personal data and the free movement of such data, and other applicable legal regulations.
- 1.2 The operator, as defined by the Personal Data Protection Act, is the person who determines the purpose and means of processing personal data and processes personal data on their behalf. The operator, as defined above, is Ing. Vladimír Mikolaj, residing at Stará vinárska 20, 811 04 Bratislava, ID: 1024670999, (hereinafter referred to as the "operator" or "ClearVueHome.com" or "ClearVueHome"), as the person providing you with short-term accommodation with basic services, determining the purpose and means of processing personal data.
- 1.3 We process your personal data to the extent necessary, with most processing activities justified by the need for these personal data to provide the requested services, related to the provision of short-term accommodation, processing necessary for compliance with the operator's legal requirements, or based on a legitimate interest in the processing. The purpose and legal basis for processing your personal data are:
 - 1.3.1 Reservation and provision of short-term accommodation in our apartments. We process your personal data primarily for the purpose of providing accommodation with privacy and basic services in connection with processing your reservation, and in accordance with the general conditions related to the provision of accommodation. This involves guest registration and communication. The data is retained for 10 years following the reservation's creation date.
 - 1.3.2 Guest record-keeping. Guest record-keeping is carried out for the purpose of processing reservations, obtaining basic information about guests, including name, ID or passport number, permanent address, duration of stay, email, and phone contact, nationality, date of birth, and the name and surname of the second guest if two guests are on one reservation. The retention period is 5 years following the year in which accommodation was provided.
 - 1.3.3 Enforcement of our legal claims. In some cases, we have the option to turn to court to enforce our rights and interests protected by law, or we have the option to participate in judicial or administrative proceedings to protect our rights and interests. The legal basis for processing personal data for this purpose is the legitimate interest of the operator. The retention period for personal data processed for

- this purpose is 10 years from the date of the court's or other public authority's final decision.
- 1.3.4 Keeping accounting records. The operator of the ClearVueHome website is subject to tax and accounting obligations arising from legal regulations. To fulfill these legal obligations, we process your personal data. The legal basis for processing personal data for this purpose is the fulfillment of the operator's legal obligations. The retention period is 10 years following the year related to payments associated with the user.
 - 1.3.5 Handling your requests as a data subject. To respond to and process your request, through which you assert your legal rights as a data subject, it is necessary for you to identify yourself. Subsequently, we process your personal data included in the request for the purpose of proper handling. The legal basis for processing personal data for this purpose is the legitimate interest of the operator. Requests from data subjects are retained for 5 years following the year in which the request was processed.
 - 1.3.6 Processing suggestions. You can submit your suggestions in accordance with the general conditions. In the case of a suggestion, we need your identification and contact details. Subsequently, we process personal data included in the suggestion for the purpose of proper handling. The legal basis for processing personal data for this purpose is the legitimate interest of the operator. Documents related to suggestions are retained for 10 years following the year in which the suggestion was concluded.
 - 1.3.7 Improving our activities. Information obtained when using our website www.clearvuehome.com, such as your IP address, browser type, and language settings, is obtained based on a legitimate interest, which is improving the quality and efficient operation of the website. Google Analytics is used for visitor measurement.
 - 1.3.8 Facilitating online payment by bank card through the Stripe payment gateway. If the reservation was paid through the Stripe payment gateway, this payment gateway processes information about your bank card in tokenized form, generating a random number representing your payment. The Stripe payment gateway uses the data from your bank card only once and does not store information about your bank card for future use. If you wish to extend your stay and it is approved, you will be asked to re-enter your bank card information for additional payment through the Stripe payment gateway. The Stripe payment gateway is compatible with PCI DSS, ensuring that your information is handled in accordance with industry security standards.
 - 1.3.9 Ensuring your security. External shared spaces – double garage and yard in front of the apartment, are monitored by the operator's camera system. Personal data processed through the camera system is processed solely for the purposes of the operator's legitimate interests, which include protecting the operator's property and the safety of individuals during their stay in the apartments. The personal data obtained in this way is archived for 7 days, after which it is automatically deleted. In the form of a video recording, it is provided based on a request from authorities conducting criminal proceedings or other authorized state authorities (e.g., the court).
- 1.4 Providing personal data is voluntary. However, we can only provide short-term accommodation in our apartments if we have the necessary personal data. The consequence of not providing personal data is the inability to reserve an apartment and the inability to provide accommodation. We process your personal data to the extent necessary, and its processing is necessary in the interest of fulfilling the operator's legal requirements or relies on a legitimate interest in the processing.
 - 1.5 If we process your personal data based on a legitimate interest, we take steps to minimize the impact on your privacy and ensure that the processing does not disrupt the balance between our legitimate interests and your privacy.
 - 1.6 The responsible person is known as the person responsible for protecting personal data processed by the operator, and they will answer any questions you may have regarding the processing of your personal data. You can contact the responsible person through the following contact details: info@clearvuehome.com, +421 902 468 151, or +421 903 400 651.

2 Scope of Processed Personal Data

- 2.1 ClearVueHome processes only those personal data that enable us to secure your reservation and accommodation with professional care while simultaneously fulfilling legal obligations. The scope of your personal data is determined in accordance with the purposes of processing personal data as outlined in point 1.3 above.
- 2.2 ClearVueHome processes your personal data through both automated and non-automated means. Automated processing of personal data is carried out through specifically secured devices.
- 2.3 ClearVueHome declares that access to your personal data is granted only to expressly authorized and informed individuals. We ensure the protection of personal data against damage, destruction, loss, alteration, unauthorized access, disclosure, provision, or publication, and any other unauthorized forms of processing. Adequate technical and organizational measures corresponding to the method of processing personal data have been implemented for such security.
- 2.4 In the case where the legal basis for processing personal data is a contract, providing personal data is a contractual requirement. The data subject is obliged to provide personal data; failure to provide such data will

result in the inability to provide accommodation.

- 2.5 If the legal basis for processing personal data is a law, providing personal data is a legal requirement. The data subject is obliged to provide personal data; otherwise, proper fulfillment of the operator's obligations arising from the relevant legal regulations is not possible.
- 2.6 If the legal basis for processing personal data is the legitimate interest pursued by the operator or a third party, the purpose of the processing is specified concerning the legitimate interest in question.
- 2.7 The personal data processed for the purposes of reservation of accommodation under point 1.3.1 of these rules and for handling requests as a data subject under point 1.3.5 of these rules include identification and contact details in the following scope: title, name and surname, contact phone number, email address, and bank connection, or transaction data, which refers to data on received and sent payments.
- 2.8 The personal data processed for the purposes of:
 - a) reservation and provision of accommodation under point 1.3.1 of these rules,
 - b) guest record-keeping under point 1.3.2 of these rules,
 - c) enforcement of legal claims under point 1.3.3 of these rules,
 - d) keeping accounting records under point 1.3.4 of these rules,
 - e) handling suggestions under point 1.3.6 of these rules, include identification and contact details in the following scope:
 - 2.8.1 name, surname, date and place of birth, nationality, email, phone number, permanent address, type and number of identification document, if there are two guests on one reservation, the name and surname of the second guest, data about the bank card in case of payment by bank card, other data related to your accommodation, such as the day of arrival and departure, communication regarding your reservation, providing a review, transaction data, which refers to data on received and sent payments. We are aware that sometimes accommodation in an apartment is needed for additional persons. In such a case, you may provide us with the personal data of additional persons as part of the reservation. However, it is your responsibility to inform the individuals whose data you are sharing, ensure they understand and consent to the way we process their personal data, and provide them with the information stated in this statement.
- 2.9 The personal data processed for the purpose of improving our services under point 1.3.7 of these rules includes communication data, which mainly refers to data from using our website, data from our business communication, or data from our mutual contact through relevant contact points, including your requests, complaints, or other forms of inquiry. Additional data obtained may include information about your interaction with us, such as how long you used our website, response times, download errors, technical data about the devices used, and settings, such as IP address, browser settings, operating system, platform, cookies, and the like.
- 2.10 The personal data processed for the purpose of handling requests as a data subject under point 1.3.5 of these rules includes identification and contact details in the following scope: title, name and surname, contact phone number, email address, and permanent address. Additional personal data processed under point 1.3.9 of these rules is your likeness recorded by the camera system.
- 2.11 In most cases, you are the source of personal data as the data subject. When using our services, you are required to adhere to these rules. Therefore, in the event that you disclose data about someone other than yourself through our platforms, we rely on your consent from the respective data subject.

3 Cookies

- 3.1 Personal data processed for the purpose of improving our services, as outlined in point 1.3.7 of these rules, also includes cookie files.
- 3.2 We use cookie files to enhance the quality of browsing for visitors to our website – www.clearvuehome.com. These are small text files stored on your device, which may be sent to your internet browser when you visit our website and are stored in the browser's file folder. Upon subsequent visits to the [www.clearvuehome](http://www.clearvuehome.com) website, the internet browser reloads the cookie files, and this information is sent back to the website that created the cookies. Cookie files allow websites to recognize your device and remember certain information about you as a visitor to our website and your activities during your visit.
- 3.3 Our website www.clearvuehome.com uses both temporary and permanent cookie files. Temporary cookie files are stored on your device only during your visit to the website. On the other hand, permanent cookie files remain on your device until their validity period expires or until you manually delete them. By visiting our website, you express your consent to the use of necessary cookie files, but you also have control elements to block or delete functional or analytical cookie files.
- 3.4 The use of cookies during your visit to our website is at your discretion, with most internet browsers preset to automatically accept cookie files. If you want to manage your cookie file preferences, you can change the cookie settings in your internet browser at any time; instructions for this are available on our website at www.clearvuehome.com/sk/privacy-policy-sk/. At the aforementioned address, you can also delete or reset cookie files by clicking on the link in the "Delete and reset cookies" section. You can allow all or only some cookie files. If you disable our cookie files in your browser settings, some parts of our website may not function properly for you, i.e., this may result in the limitation or exclusion of certain features and a reduction in your comfort during your visit to our website. The complete list of specific cookie files that our website uses

is provided below:

Necessary cookies - are absolutely essential for the website to function properly. These cookies ensure basic functionalities and security features of the website, anonymously.		
Necessary cookie	Duration	Description
cookieLawInfo-checkbox-analytics	11 months	The cookie is used to record the user consent for the cookies in the category "Analytics".
cookieLawInfo-checkbox-functional	11 months	The cookie is used to record the user consent for the cookies in the category "Functional".
cookieLawInfo-checkbox-necessary	11 months	The cookie is used to record the user consent for the cookies in the category "Necessary".
CookieLawInfoConsent	1 year	Records the default button state of the category & status of GDPR. It works only in coordination with the primary cookie.
viewed_cookie_policy	11 months	The cookie is used to store whether or not user has consented to the use of cookies. It does not store any personal data.
Functional cookies - help to ensure correct functionality of the Youtube embedded video playback. They also remember your language preferences on repeat visits and collect functionality feedback.		
Functional cookie	Duration	Description
pll_language	1 year	The pll_language is used to remember the language selected by the user when returning to the website.
VISITOR_INFO1_LIVE	5 months 27 days	A cookie set by YouTube to measure bandwidth that determines whether the user gets the new or old player interface.
YSC	Session (until you close your browser)	YSC cookie is set by Youtube and is used to track the views of embedded videos on Youtube pages.
yt-remote-connected-devices	Session (until you close your browser)	YouTube sets this cookie to store the video preferences of the user using embedded YouTube video.
yt-remote-device-id	Session (until you close your browser)	YouTube sets this cookie to store the video preferences of the user using embedded YouTube video.
Analytical cookies – are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc.		
Analytical cookie	Duration	Description
_ga	2 years	The _ga cookie, installed by Google Analytics, anonymously calculates visitor and session data and keeps track of site usage.
ga_53SRWF3DYL	2 years	This cookie is installed by Google Analytics.
CONSENT	2 years	YouTube sets this cookie via embedded youtube-videos and registers anonymous statistical data.

4 Protection of Your Personal Data

- 4.1 Your personal data is processed by automated and non-automated means within our information systems, which are protected and secured in accordance with the relevant security standards described below.
- 4.2 To ensure the necessary level of security for personal data against loss, destruction, unauthorized access, changes, unauthorized provision, or misuse, the operator has taken the necessary technical and organizational measures and implemented security technologies and procedures. One of the measures is storing your personal data in databases/software accessible only to the operator and persons authorized by the operator (Albert Mikolaj, info@clearvuehome.com, +421 902 468 151, hereinafter also referred to as "authorized persons"), who have been properly briefed on the procedures for protecting the security of your personal data by the operator and have been informed about the possible consequences of not following these instructions.
- 4.3 We regularly monitor the access of the authorized persons mentioned here to your personal data, use firewall gateways, antivirus programs, ensure regular password changes, use secure servers (located in the EU, as well as backup servers; access is limited to authorized users. ClearVueHome also strives to maintain security international PCI standards for the protection, storage, encryption, and sensitive data; personal data in the database is encrypted). The online payment gateway Stripe, which our website uses for card payments, is one of the most secure payment gateways meeting all important international security standards. All electronic devices containing your personal data are secured with passwords and two-factor authentication. Encryption of personal data and password protection for access to the operator's internal systems is used for maximum protection. Organizational measures consist of a set of rules of conduct for authorized persons, which are incorporated into contracts concluded with authorized persons but are confidential due to their business nature.
- 4.4 We adhere to the principle of minimizing personal data and process only such personal data that is necessary to achieve the purpose of processing. Personal data is processed for predefined purposes and is not processed for any other purpose. We continuously evaluate whether the processing of personal data for the individuals involved would pose a high risk and unduly interfere with their privacy. Based on this observation, a detailed risk and privacy impact assessment is conducted, the result of which is taken into account when setting and

implementing the operator's procedures.

5 Recipient of Your Personal Data

- 5.1 In exceptional cases, your personal data may be disclosed to third parties, especially if such a procedure is allowed by the relevant legal regulations.
- 5.2 Some processing activities are carried out through our suppliers and contractual partners. When selecting suppliers, we focus primarily on their professional, technical, organizational, and personnel capabilities to ensure the security of processed personal data.
- 5.3 Among our suppliers and business partners are, but not limited to:
 - 5.3.1 Provider of web and hosting services, servers, data backup, and storage: Hetzner Online GmbH, headquartered in Gunzenhausen, Bavaria, Germany.
 - 5.3.2 Domain provider: Namecheap.com, headquartered in Los Angeles, California, USA.
 - 5.3.3 Providers of system support and programming services: Albert Mikolaj, located at Stará vinárska 20, 81104, Bratislava.
 - 5.3.4 Provider of online payment services - when paying by credit card, the payment is processed by an external service provider. When paying by credit card, your information is directly collected by Stripe.com, headquartered in San Francisco, California, USA.
- 5.4 In connection with inspections or supervision, your personal data may be provided to the authority that, by law, monitors the performance of our activities, e.g., the Office for Personal Data Protection of the Slovak Republic, the Slovak Trade Inspection, relevant tax administrators, and others. Based on specific legal regulations, we provide personal data to certain entities to which we are obliged to provide this data upon their request for cooperation, such as public administration authorities, courts, prosecutors, law enforcement authorities, or the Financial Administration of the Slovak Republic.
- 5.5 In connection with the enforcement of our rights and legally protected interests, we may provide your personal data to relevant courts, bailiffs, notaries, law firms, expert witnesses, or other external entities involved in the enforcement of claims or the exercise of rights.

6 Retention Period of Your Personal Data

- 6.1 We retain and protect your personal data for the period specified by applicable legal regulations. If we store your personal data based on your granted consent, we keep the personal data for the duration of the consent you have provided. The retention periods for personal data vary depending on the specific purpose for which the personal data is processed, and their duration is specified in section 1.3 of these rules. The established retention period for personal data is based on the principle of minimizing the storage of personal data.
- 6.2 In some cases, you provide us with your personal data by filling in specific details either in an online form during the reservation process or in a form placed in your apartment upon check-in, within the scope specified in section 1.3.2 of these rules. Subsequently, the forms are stored in the archive, accessible only to the operator and authorized personnel.

7 Your Rights

- 7.1 You have the following rights:
 - 7.1.1 **Right of Access to Data:**

You have the right to obtain information from us about whether we process your personal data. If we process your personal data, you have the right to access this personal data, including the purpose of processing, categories of personal data, recipients of personal data, duration of personal data processing, and information about the source from which we obtained your personal data. Furthermore, you have the right to receive a copy of your personal data, but it is necessary for you to explicitly specify this in your request. If you request additional copies, we have the right to charge a reasonable fee for issuing additional copies. However, the rights of third parties, including other individuals who provided personal data to the operator, cannot be restricted in this way, and the operator cannot provide you with their personal data.
 - 7.1.2 **Right to Rectification or Addition of Data:**

You have the right to request the correction of incorrect personal data or the addition of incomplete personal data that we process about you. By exercising this right correctly, you help maintain the accuracy and completeness of your personal data.
 - 7.1.3 **Right to Erasure (Right to Be Forgotten):**

You have the right to request the erasure of your personal data without undue delay if one of the following reasons applies:

 - a) Personal data are no longer necessary for the purposes for which they were collected or otherwise

processed.

b) The data subject withdraws consent or objects to the processing, and there is no other legal basis for processing.

c) The data subject objects to the processing, and there are no overriding legitimate grounds for the processing, or the data subject objects to processing for direct marketing purposes.

d) Personal data have been processed unlawfully.

e) Personal data must be erased to fulfill a legal obligation under the law of the European Union or the Member State to which the operator is subject.

The operator is not obligated to erase your personal data if the processing is necessary:

a) to exercise the right to freedom of expression and information,

b) to comply with a legal obligation that requires processing under the law of the European Union or the Member State to which the operator is subject, or to perform a task carried out in the public interest or in the exercise of official authority,

c) for reasons of public interest in the area of public health,

d) for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes,

e) for the establishment, exercise, or defense of legal claims.

If there is a situation that would lead to the lifting of the restriction on the processing of personal data, the operator will inform the data subject in advance.

7.1.4 Right to Restriction of Processing:

You have the right to request the blocking of your personal data (restriction of processing of your personal data for storage; other processing operations during blocking are not allowed) in the following cases:

a) Restriction of processing of your personal data during the verification of their accuracy.

b) If your personal data are processed unlawfully, and you request only the restriction of their processing (only storage instead of erasure).

c) You need your personal data to establish, exercise, or defend legal claims.

d) You have objected to processing (legitimate interest or public interest), pending verification of whether the legitimate grounds of the operator override your legitimate interests.

In the event of restricting the processing of personal data, the operator may only store or process personal data for the following purposes:

a) to establish, exercise, or defend legal claims,

b) to protect the rights of another natural or legal person,

c) for reasons of significant public interest of the European Union or a Member State,

d) with the consent of the data subject.

If a situation arises that would lead to the lifting of the restriction on the processing of personal data, the operator will inform the data subject in advance.

7.1.5 Right to Data Portability:

You have the right to obtain your personal data provided to us in a structured, commonly used, and machine-readable format. You have the right to request that we transmit your personal data from the operator to another operator, as long as this is technically feasible. The right to data portability applies in cases where:

a) processing is based on consent or a contract,

b) processing is carried out by automated means.

7.1.6 Right to Object:

You have the right to object at any time to the processing of your personal data if the legal basis for processing personal data is a legitimate interest. You can exercise this right by sending a written request to the email address info@clearvuehome.com, by mail, or by personally delivering a written request to the operator. Upon receipt of the objection, we will destroy your personal data, except in the following cases:

a) if the operator demonstrates compelling legitimate grounds for processing that override your interests, rights, and freedoms,

b) if it is proven that the operator needs your personal data to establish, exercise, or defend legal claims; Your objections do not affect the processing of your personal data before the receipt of your objections.

7.1.7 Automated Individual Decision-Making, Including Profiling:

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. This right does not apply if the decision:

a) is necessary for the conclusion or performance of a contract between the data subject and the operator.

b) is permitted by Union or Member State law to which the operator is subject, and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or
c) is based on the data subject's explicit consent.

During the reservation or the provision of short-term accommodation in our apartments, there is no automated individual decision-making in terms of the General Data Protection Regulation.

7.1.8 Exercise of Your Rights:

The operator will provide information regarding the processing of personal data based on a request from the data subject when exercising their rights, provided that the data subject is demonstrably capable of identification. Without successful verification of your identity, the operator is not obligated to provide any information regarding the processing of personal data. The operator thus prevents unauthorized access to your personal data and the violation of your rights by an unauthorized person.

7.2 You can exercise your rights to personal data in the following ways:

7.2.1 in person at the operator's office at Stará vinárska 20 in Bratislava,

7.2.2 by mail, by sending a letter to the operator's registered office,

7.2.3 by email, by sending an email to info@clearvuehome.com.

7.3 The request must contain all the necessary information and attachments necessary for its processing and the assessment of your claims regarding the processing of personal data. If your request is incomplete, we will contact you to supplement the request.

7.4 In the event that you exercise any of your rights as a data subject, the operator's authorized persons will also be notified of your request.

8 Final Provisions

8.1 The operator, ClearVueHome, is authorized to update these rules at any time, especially in connection with changes in legal regulations regarding the protection of your personal data. The current version will always be available on our website www.clearvuehome.com. In the event of a substantial change in the protection of personal data, especially the processing of personal data, the operator will fulfill its information obligation by visibly publishing a notice before implementing the changes.

8.2 With these principles, we want to assure you that we treat personal data with the utmost care and respect, following applicable legal regulations and utilizing the available level of technical protection. If you have questions regarding the protection of personal data that you did not find answers to in this document, please write to the email address info@clearvuehome.com.

8.3 These rules are valid and effective as of the date of their publication on the operator's website and have been updated as of 10.02. 2024.