**PRIVACY POLICY**

 **Wellness & Spa Consulting sp. z o.o. ul. Hubska 121/9, Wrocław**

This Privacy Policy, hereinafter referred to as the Policy, has been drawn up in order to demonstrate that personal data is processed and secured in accordance with the legal requirements regarding the principles of data processing and security at Wellness & Spa Consulting sp.z o.o. ul. Hubska 121/9, Wrocław, including Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95 / 46 / WE (hereinafter referred to as GDPR).

 **Abbreviations and definitionss**

1. **Data Administrator** of Wellness & Spa Consulting sp. Z o.o. ul. Hubska 121/9, Wrocław

2. **Personal data** - any information relating to an identified or identifiable natural person

3. **IT system** - a set of cooperating devices, programs, information processing procedures, software tools used for data processing

4**. User** - a person authorized by the Data Administrator to Process personal data

5. **Data set** - each structured set of personal data, available according to specific criteria

6. **Data processing** - any operations performed on Personal Data, such as collecting, recording, storing, developing, changing, sharing and deleting in a traditional form and in IT systems

7. **User ID** - a string of letters, numbers or other characters that uniquely identifies the person authorized to process personal data in the IT system (User) in the case of Personal data processing in such a system

8. **Password** - a string of letters, numbers or other characters, known only to the person authorized to work in the IT system (User) in the event of processing personal data in such a system

9. **Authentication** - action the purpose of which is to verify the declared identity of the entity (User).

**I. General provisions**

1. The Policy applies to all Personal Data processed at Wellness & Spa Consulting sp.z o.o.
ul. Hubska 121/9, Wrocław, regardless of the form of their processing (traditionally processed record sets, IT systems) and whether the data is or can be processed in data sets.

2. The policy is stored in an electronic version and in a paper version at the Administrator's office.

3. The policy is made available for inspection by persons authorized to process personal data at their request, as well as by persons who are to be authorized to process personal data, in order to read its content.

4. For the effective implementation of the Policy, the Data Administrator provides:

a) technical measures and organizational solutions appropriate to the threats and categories of data subject to protection,

b) control and supervision over the processing of personal data,

(c) monitoring the security measures applied.

5. The Data Administrator's monitoring of the applied protection measures includes, inter alia, Users' actions, violating the rules of access to data, ensuring the integrity of files and protection against external and internal attacks.

8. The Data Administrator ensures that the activities performed in connection with the processing and protection of personal data are consistent with this policy and the relevant legal provisions.

**II. Personal data processed by the data controller**

1. Personal data processed by the Data Administrator are collected in data files.

2. The data controller does not undertake processing activities that could be associated with a serious probability of a high risk for the rights and freedoms of persons. If such an action is planned, the Administrator will perform the activities specified in art. 35 et seq. GDPR.

3. In the case of planning new processing activities, the Administrator analyzes their consequences for the protection of personal data and takes into account data protection issues at the stage of their design.

4. The data administrator runs:

a) a register of processing activities. The template of the register of processing activities is attached as Appendix 1 to this policy.

b) records of persons authorized to process data - the template of the records constitutes Appendix 2 to this policy

c) records of the disclosure of personal data - the template of the records is attached as Appendix 3 to this policy

5. The data administrator conducts training in the field of personal data protection for each employee / associate, which is confirmed by the initial training card constituting Annex 4 to this policy

**III. Responsibilities and responsibilities in the field of safety management**

1.All persons are required to process personal data in accordance with applicable regulations and in accordance with the Security Policy established by the Data Administrator, the IT System Management Instruction, as well as other internal documents

and procedures related to the processing of personal data at Wellness & Spa Consulting sp.z o.o. ul. Hubska 121/9, Wrocław

2. All personal data at Wellness & Spa Consulting sp.z o.o. ul. Hubska 121/9, Wrocław are processed in compliance with the processing rules provided for by law:

a) In each case, there is at least one of the grounds for data processing provided for by law.

b) The data is processed fairly and transparently.

c) Personal data is collected for specific, explicit and legitimate purposes and not further processed in a manner inconsistent with these purposes.

d) Personal data is processed only to the extent necessary to achieve the purpose of data processing.

e) Personal data is correct and, if necessary, kept up to date.

f) The storage time is limited to the period of use for the purposes for which they were collected, and after this period they are anonymized or deleted.

g) The information obligation is fulfilled towards the data subject in accordance with art. 13 and 14 GDPR.

h) The data is secured against violations of the rules of their protection.

3.The violation or an attempted violation of the rules for the processing and protection of Personal Data are in particular:

a) breach of the security of IT systems in which personal data are processed, in the event of their processing in such systems;

b) making data available or enabling it to be made available to unauthorized persons or entities;

c) failure, even unintentionally, to comply with the obligation to ensure the protection of personal data;

d) failure to fulfill the obligation to keep the Personal Data secret and the methods of securing them;

e) processing of Personal Data inconsistently with the assumed scope and purpose of their collection;

f) causing damage, loss, uncontrolled alteration or unauthorized copying of Personal Data;

g) violation of the rights of persons whose data are processed.

4. In the event of a breach of the personal data protection rules, the User is obliged to take all necessary steps to limit the effects of the breach and to immediately notify the Data Administrator,

5. The obligations of the Data Administrator in the scope of hiring, terminating or changing the terms and conditions of employment of employees or associates (persons undertaking activities for the Data Administrator on the basis of other civil law contracts) include ensuring that:

a) employees were properly prepared to perform their duties,

b) each of the processors of Personal Data was authorized in writing to process, and the employee undertook to keep the personal data processed by the Data Administrator confidential. "Statement and obligation of the person processing personal data" - a template of the statement is Annex 5 to this Security Policy,

6. Employees are required to:

a) strictly observe the scope of the granted authorization;

b) processing and protection of personal data in accordance with the provisions;

c) keep the personal data and the methods of securing them confidential;

d) reporting incidents related to a breach of data security and improper functioning of the system.

**IV. The area of personal data processing**

1. The area in which Personal Data is processed at the premises of Wellness & Spa Consulting sp.z o.o. ul. Hubska 121/9, Wrocław, includes an office space located on the company's premises and places where Wellness & Spa Consulting sp.z o.o. ul. Hubska 121/9, Wrocław provides services - hotels.

2. In addition, the area in which Personal Data is processed includes all laptops and other data carriers located outside the area indicated above.

**V. Specification of technical and organizational measures necessary to ensure confidentiality, integrity and accountability of the processed data**

1. The Data Administrator ensures the application of technical and organizational measures necessary to ensure confidentiality, integrity, accountability and continuity of the processed data.

2. The applied protection measures (technical and organizational) should be adequate to the identified risk level for individual systems, types of files and data categories, The measures include:

a) Restricting access to the premises where personal data is processed only to duly authorized persons. Other persons may stay in the premises used for data processing only in the company of an authorized person.

b) Closing the rooms forming the Personal Data Processing area

specified in point IV above for the duration of the employees' absence, in a way that prevents access by third parties.

c) Use of lockable cabinets for securing documents.

d) The use of a shredder for the effective removal of documents containing personal data.

e) Protection of the local network against activities initiated from the outside using a firewall.

f) Making backup copies of data on an external drive

g) Protection of the administrator's computer equipment against malware.

h) Securing access to the Data Administrator's devices with access passwords.

i) The use of data encryption during their transmission - e-mail messages.

3. Detailed rules for managing the IT system are set out in Annex 6 to the IT System Management Instruction.

4. Detailed rules for the use of portable computers are set out in Annex 7 - Regulations for the use of portable computers

**VI. Violations of the rules of personal data protection**

1. In the event of a breach of personal data protection, the Administrator assesses whether the breach could cause a risk of violation of the rights or freedoms of natural persons.

2. In any situation in which the breach could cause a risk of violation of the rights or freedoms of natural persons, the Administrator shall notify the supervisory authority of the breach of data protection rules without undue delay - if feasible, no later than 72 hours after finding the breach. The form of the notification is set out in Annex 8 to this policy.

3. If the risk of violation of rights and freedoms is high, the Administrator shall also notify the data subject about the incident.

**VII. Entrusting the processing of personal data**

1. The Personal Data Administrator may entrust the processing of personal data to another entity only by way of an agreement concluded in writing, in accordance with the requirements indicated for such agreements in Art. 28 GDPR

2. Before entrusting the processing of personal data, the Administrator, if possible, obtains information about the processor's current practices regarding the protection of personal data.

**VIII. Transfer of data to third countries or international organisations**

This is to inform you that your personal data are not transferred beyond the European Economic Area.

**IX. Additional provisions**

1. The employee is liable for failure to comply with the obligations arising from this document under the Labor Code, the Personal Data Protection Regulations and the Penal Code.

2. The following Appendices constitute an integral part of this Privacy Policy and are available on request at PRISMA SPA TEAMS.

**Attachments:**

- Appendix No. 1 - Template of the register of processing activities

- Appendix No. 2 - Template record of persons authorized to process data

- Appendix No. 3 - Template record of sharing personal data

- Appendix No. 4 - Initial training card on personal data

- Appendix No. 5 - Template declaration and obligation of the person processing personal data

- Appendix No. 6 - IT system management instruction

- Appendix No. 7 - Regulations for the use of portable computers

- Appendix No. 88 - Violation notification template