

# SUMMARY OF THE DATA PROTECTION POLICY OF THE HIT d.d. NOVA GORICA COMPANY



This summary is intended for your familiarization with your rights in regard to the protection of personal data that you have entrusted us with and the purposes of its processing. The summary covers only key information about which we must inform you in accordance with the applicable legislation. It is recommended that you read the longer and more detailed notice about our company's Data Protection Policy, which is available in all HIT d.d., Nova Gorica business units and on the website <http://www.hit.si>.

## WHO AM I ENTRUSTING WITH MY PERSONAL DATA

**Data Controller:** HIT hoteli, igralnice, turizem d.d. Nova Gorica, Delpinova ulica 7A, 5000 Nova Gorica

**Data Processors (contractual controllers):** No other legal entity collaborates with us on processing of your personal data in order to provide the Privilege Club services. In exceptional cases, when direct marketing or informing in regard to the Privilege Club membership is being conducted, your personal data can be processed by the providers of communication channels (e.g. Pošta Slovenije), whereby we have concluded appropriate personal data processing agreements with all potential processors, which require an adequate level of personal data protection, in accordance with the applicable legislation.

## CONTACT DETAILS OF THE DATA PROTECTION OFFICER

**Maja Erjavec, Odvetniška pisarna Čehovin in Erjavec d.o.o.**, [dpo@hit.si](mailto:dpo@hit.si), t+386 5 333 0980

## WHY WE USE YOUR PERSONAL DATA AND ON WHAT LEGAL GROUNDS

We use the personal data which you provide on the application form to enroll into the Privilege Club and other data collected in the context of providing Privilege Club services, exclusively for the purpose of the Privilege Club membership, fulfilling legal requirements and other purposes for which you give your consent or for which we have a legitimate interest.

### a) Providing Privilege Club Services

Use of your personal data, needed for the purpose of fulfilling our obligations from the contract, covers the use of your personal data which is necessary for providing Privilege Club services, e.g. tracking of collecting and redeeming of points, comps at gaming tables and other benefits of the Membership Card and other activities you carry-out when using Privilege Card, as that allows us to, on the basis of further processing of your personal data, classify you in a specific member tier (silver, gold and black Membership Card and similar). You can read more about this in the General Terms and Conditions for the Privilege Club Operation

### b) Fulfillment of Legal Requirements

Use of your personal data for fulfilling legal requirements covers especially the record keeping of safety events, recording of invoicing, hotel guests, entrance of players and non-players, ensuring video surveillance, maintaining surveillance videos about the activities in casino and other HIT premises, management of guests' credit card data (for bookings, compensations for untimely cancellation, repayment of all or partial costs that incurred during the stay, etc.), record keeping of received cash prizes and gifts by the guests in the casinos, recordkeeping of players in the online casino, recordkeeping of casino guests who conduct transaction with non-cash means of payment, record keeping of other transactions performed in relation towards HIT Nova Gorica d.d. and guests who performed those transactions.

### c) Use of Your Personal Data on the Grounds of Your Consent

In case you gave the appropriate consent, we can also use your personal data for:

## INFORMING ABOUT BENEFITS FOR PRIVILEGE CLUB MEMBERS

We also use your personal data, acquired on the basis of your Privilege Club membership and your activities in relation to it, to inform you about benefits that you are entitled to on the basis of your membership in the Privilege Club. This applies to all benefits that we grant to all Privilege Club members, those that you are entitled to on the basis of your Privilege Club membership tier (owner of silver, gold or black Membership Card), as well as those that belong to you on the basis of potential daily, weekly, monthly, semi-annual collecting and redeeming of points, comps at gaming tables, other benefits on the basis of Membership Card usage and other valid promotions for individual business units in accordance with relevant conditions for specific business unit promotion.

## PERSONALIZED OFFERS (DIRECT MARKETING)

We also use your personal data, acquired on the basis of your Privilege Club membership and your activities in relation to it, to inform you about current, special and personalized offers, new offers or services, prize contests and other business units' news on the basis of personal data acquired in the context of your Privilege Club membership in the manner described in the General Terms and Conditions for Privilege Club Membership and Operation which cover:

- merging of members into individual groups (silver, gold, black membership card, game on slot machines, at gaming tables, redeeming benefits) on the basis of processing of personal data, and
- analysis of your personal data on an individual level, which is necessary for classifying members into above mentioned groups and preparing offers tailored to your needs on the basis of that.

Therefore, we use personal data acquired on the basis of your Privilege Club membership for direct marketing, as that allows us to tailor the direct marketing according to your interests and needs.

## SURVEYS, ANALYSES AND RESEARCH

We use your personal data, acquired on the basis of your Privilege Club membership and your activities in relation to it for performing surveys, analyses and research that are not intended for marketing, but primarily for improving our business units' offerings and services and includes analyses of operation, visits, etc.

## EXISTENCE OF COMPUTER (AUTOMATED) PROCESSING OF YOUR PERSONAL DATA

We use computer systems for processing your personal data, which enable automatic processing of your personal data. These systems are essential (and are used) for appropriate classifying of Privilege Club members into groups (silver, gold, black Membership Card) on the basis of designed profiles, as well as for appropriate tracking of collected and redeemed points, comps at gaming tables and other Membership Card benefits, which are acquired by the members with their activities.

The notifying of Privilege Club members about acquired benefits, direct marketing on the basis of your personal data acquired in the context of your Privilege Club membership, as well as sending you surveys and performing analyses and research on the basis of the survey's findings and other activities in the context of the Privilege Club is also automated (i.e. exclusively on the basis of computer's management) if you gave your consent for such processing.

In regard to decisions on the basis of your personal data, which are based only on the above described automated processing of your personal data in the context of your Privilege Club membership, including formation of segments and profiles on the basis of it and that for you entail certain legal effect or similarly affect you position, you have the right to submit a request to annul such decision. This exception is valid if such a decision is necessary for providing services in regard to the membership in the Privilege Club, if there is an explicit legal basis on a national or EU level for such processing or if it is justified with your explicit consent for that purpose.

In case of automated decision-making, segmenting and profiling, which is necessary for providing services related to the Privilege Club membership or is justified on the basis of your explicit consent, you have the right to request that the decision is personally reviewed by us (right to obtain human intervention on the part of the controller), to express your own point of view, as well as to contest the decision. The manner of exercising your rights in regard to the processing of your personal data is described below in the context of the section YOUR RIGHTS IN REGARD TO THE PROCESSING OF YOUR PERSONAL DATA.

## WHO CAN ACCESS YOUR PERSONAL DATA

Users of personal data are our employees (or employees of potential processors), who are legally bound to respect provisions of the data protection regulations and relevant general acts of HIT d.d. Nova Gorica and concluded contracts, on the basis of which they are legally bound to protect confidential data and respect and protect customers' personal data. Customers' personal data is the company's trade secret.

## STORAGE OF YOUR PERSONAL DATA

The period for which the personal data will be stored varies according to the criteria for each category of personal data. Personal data is stored only as long as it is needed to achieve the purpose of processing for which it was collected or processed further or until the legally required storage period expires.

After the fulfillment of the purpose of processing or after the expiry of the storage period, personal data is deleted, destroyed, blocked or anonymized if they are not, on the basis of legislation regulating archival material and archives, classified as archival material or if the Data Protection law does not state otherwise for specific category of personal data.

## YOUR RIGHTS IN REGARD TO THE PROCESSING OF YOUR PERSONAL DATA

In this section, we are presenting you with your rights that you can exercise in regard to our processing of your personal data and ensuring its legal and transparent processing.

You can exercise all rights described below in writing, by submitting a special form, which is available at all Privilege Points in Hit d.d. Nova Gorica business units that participate in the loyalty program Privilege Club, whereby we reserve the right to identify the customer, via the website <http://www.hit.si/myprivilege> when using an e-mail and received password or via e-mail to [info@hit.si](mailto:info@hit.si), using the e-mail address given for the purpose of the Privilege Club membership.

In case of any confusion in regard to your rights, you can always request an additional explanation from us or our Data Protection Officer.

### a) Right to Withdraw Consent

If you wish to withdraw your already given consent, you can do that at any time by filling out a short form.

### b) Right to Access

You can always access your personal data that we process easily and in reasonable time intervals free of charge, on the basis of a submitted written request.

For additional copies or in case of unjustified or repetitive requests, we reserve the right to charge a reasonable fee in accordance with administrative costs.

**c) Right to Rectification**

At your request, we rectify or amend any incorrect or old personal data that we process, without undue delay.

**d) Right to Erasure**

Your personal data, (i) which is no longer necessary in relation to the purposes for which it was collected or otherwise processed, (ii) which is being processed on the basis of withdrawn consent and there are no other legal grounds for processing, (iii) and there are no overriding legitimate grounds for the processing, or those (iv) which were processed unlawfully, will be erased without undue delay.

**e) Right to Restriction of Processing**

We restrict the processing of your personal data, when (i) you contest the accuracy of the personal data (for a period enabling the controller to verify the accuracy of the personal data), (ii) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead, (iii) we no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defense of legal claims (iv) or you filed an objection against data processing (pending the verification whether the legitimate grounds of the controller override those of the data subject).

When processing has been restricted, such personal data will, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims, to ensure rights of other natural or legal persons.

We will always notify you before terminating any restrictions of processing.

**f) Right to Data Portability**

At your request, we will forward the personal data you provided to another controller, when processing is based on consent or a contract and when it is technically feasible.

**g) Right to Object**

If your personal data is being processed on the basis of our legitimate grounds or for the purposes of direct marketing, which includes profiling, then you can object to such processing.

**h) Right to File a Complaint with the Information Commissioner**

If we do not answer your request within 1 month or if we deny your request, you can file a complaint, the resolution of which is the Information Commissioner's responsibility.

A complaint due to a denial has to be submitted to the controller within 15 days from expiry of a 1-month period, or receipt of a negative answer. You can submit a request and a complaint using a special form, which is published on the Information Commissioner's website.