

Privacy Policy

1 GENERAL PROVISIONS

S.I.D. VILLAS (hereinafter as “we” or “**S.I.D. VILLAS**”) is committed to conducting its business in line with best personal data protection practices. Personal data refers to any information that identifies you or could be used to identify you. This Privacy Policy provides you with transparent information about how S.I.D. VILLAS, as a data controller, collects, processes, shares, and otherwise uses your personal data and your related rights. You will also learn what your rights as a data subject are and how you may exercise them.

S.I.D. VILLAS is respectful of data privacy and is committed to protecting your personal data in accordance with the principles in applicable data protection laws including the European General Data Protection Regulation (EU 2016/679) (the “**GDPR**”), Directive 2002/58/EC (the “**e-Privacy Directive**”) and the national laws implementing derogations, exceptions, or other aspects of the GDPR or the e-Privacy Directive.

2 CONTROLLER OF PERSONAL DATA

The Controller of your Personal Data is **S.I.D.VILLAS s.r.o.**, tax ID number 07665741, with its registered office at U Milosrdných 850/8, Praha 1, Staré Město 110 00, Czech Republic, which operates in Greece through its legally established branch under the name 'S.I.D. VILLAS E.Π.E.', with registered office in Kalandra, Chalkidiki, POST CODE 63077, with GEMI number 149669157001 and Greek tax number EL 996913256.

3 CONTACT DETAILS

If you have any questions relating to the processing of your personal data, or about this Privacy Policy, or you wish to exercise any of your rights as a data subject, please contact us at: info@pohodavillas.com.

4 PURPOSE, LEGAL BASIS AND SCOPE OF THE PROCESSING OF PERSONAL DATA

We only process your personal data within the scope, for legitimate purposes and based on the legal basis (particularly for the fulfillment of our contractual and/or statutory obligations and for the exercise of our legitimate interests or based on consent granted by you) as specified below:

4.1 Booking reservation

If you decide to make a booking reservation with us by whatever means, we may collect the following information: your name and surname, national identity document or passport number, date of birth, address of permanent residence, nationality, email address, telephone number, company and credit card number. We collect this data for the purposes of completing and processing your booking reservation, payment, fees, additional charges, facilitating your booking, organizing airport transfers, facilitating your stay and providing any additional services to you.

If you are making a booking reservation for additional guests, we may also collect the personal data of these guests.

The legal basis for processing of personal data is the performance of a contract which we conclude with you through your acceptance and in accordance with our Terms and Conditions. In accordance with our Terms and Conditions, the contract is concluded based on your reservation which is considered as valid and binding when it is confirmed by the Accommodation Provider in writing or by an automated e-mail confirmation generated by the online booking system for the short-term rental of a house for recreational purposes in Greece.

4.2 Check-in procedure

Upon your arrival at our resort, we may collect information necessary for the completion of the check-in procedure, such as your name and surname, national identity document or passport number, date of birth, address of permanent residence, nationality, email address, telephone number and credit card number, arrival date and departure date.

If you are completing check-in with additional guests, we may also collect the personal data of these guests.

The legal basis for processing of personal data is the performance of a contract which we conclude with you through your acceptance and in accordance with our Terms and Conditions. In accordance with our Terms and Conditions, the contract is concluded based on your reservation which is considered as valid and binding when it is confirmed by the Accommodation Provider in writing or by an automated e-mail confirmation generated by the online booking system for the short-term rental of a house for recreational purposes in Greece.

4.3 Assurance of physical security

On our premises, we may operate CCTV systems to monitor public areas (such as the main entrance). In such cases, we may process your personal data within the scope of CCTV system's recordings.

The legal basis for processing of such personal data is the protection of our legitimate interests — primarily, ensuring the safety of our guests, prevention of damage, protection of property, and the fulfilment of legal obligations.

4.4 Informing you about our services

We may also process your personal data such as your name, surname and email address to provide you with marketing communication and other promotional offers about our services and products.

The legal basis for processing of such personal data is your consent. You have the right to withdraw your consent at any time. For more details on the withdrawal of your consent, please see Section 9 below.

4.5 Complying with legal obligations

We may also process your personal data to comply with applicable legal provisions, for example for billing or taxing purposes.

The legal basis of processing of such personal data is ensuring compliance with legal obligations.

4.6 Protection of our interests in disputes

We may also process your personal data for the potential establishment, exercise, and/or defense of our legal claims in judicial and/or administrative proceedings. We may use the information about you to detect, prevent and address fraud and other illegal activity and to establish, exercise or defend our legal claims and protect our rights.

The legal basis of processing of such personal data is our legitimate interest.

5 DURATION OF PROCESSING

We will store your personal data for as long as it is necessary and appropriate in view of the relevant purposes of data processing – namely, as follows:

- personal data processed on the legal basis of the fulfilment of the contract entered into between us and you is stored for the duration of the relevant contract, and after termination of such contract for as long as necessary;
- personal data processed on the legal basis of the fulfilment of legal obligations is stored for the duration required by the relevant laws;
- personal data processed on the basis of a previously granted consent is stored for the duration set out in the consent previously granted or is withdrawn but shall not exceed a period of one year from granting such consent. You have the right to withdraw your consent at any time. For more details on the withdrawal of your consent, please see Section 9 below;
- personal data processed on the legal basis of the protection of our legitimate interests is stored for a period that is absolutely necessary; CCTV recording are stored for a period 48 hours and deleted immediately thereafter, unless the specific section of recordings is necessary for the protection of our legitimate interests, e.g. in connection with investigation of unlawful activities on our premises.

6 SHARING AND TRANSFER OF PERSONAL DATA TO THIRD PARTIES

We may share your personal data with non-affiliated third parties such as professional advisors or public authorities when necessary:

- to comply with legal obligations;
- to enforce or defend the legal rights of S.I.D. VILLAS in connection with corporate restructuring, such as a merger or business acquisition, or in connection with an insolvency situation;
- to prevent fraud or imminent harm; and/or
- to ensure the security and operability of our services.

We may also share your data with our trusted business partners, who process your data as our vendors and data processors on our behalf and pursuant to our instructions. We strive to select our vendors carefully and ensure they are able to provide adequate data protection and security safeguards.

Your personal data can be shared through third-party cookies and other related technologies that are used by third parties. Please refer to our Cookie Policy available [here](#) for more information.

We do not transfer your personal data to third parties outside of the European Union. In case you use third-party platforms or services of travel providers for your booking, your personal data will be processed in accordance with the privacy policies of these providers. When using these services, we recommend that you read the privacy policy of the respective provider.

7 DATA SECURITY

With regard to the possible risk of harm to you as the data subject, we have implemented and maintain appropriate technical and organizational measures, internal controls, and information security processes in accordance with the applicable data protection laws and best business practices in order to protect your data against accidental loss, destruction, alteration, unauthorized disclosure or access or unlawful destruction.

We employ various security measures to protect the information we collect, as appropriate to the type of information, including encryption, firewalls, and access controls. We ensure that all individuals who have access to your data and are involved in the collection, processing, use, and/or storage thereof are bound by appropriate confidentiality obligations and have appropriate training.

8 PERSONAL DATA OF MINORS

We do not intentionally collect or process personal information directly from individuals under the age of 15. Rather, we strive to obtain any necessary information through the minor's legal guardian and secure all

relevant consents as required by law. However, given the practical limitations in verifying the age of all individuals accessing our websites, we advise parents or legal guardians to notify us if they become aware of any unauthorized provision of personal information by a minor. Upon such notification, we will take appropriate measures, including, but not limited to, data deletion, to ensure compliance with applicable privacy regulations.

9 YOUR RIGHTS AS A DATA SUBJECT

If you have any questions or concerns about the handling of your personal data, and/or you wish to exercise your data subject rights, please contact us at any time via the contact details provided in Section 3 of this Privacy Policy.

9.1 Access to your personal data

You have the right to obtain confirmation as to what personal data we process or do not process with respect to you. You may contact us at any time with a request to receive more information regarding the following:

- the purposes for which we use your personal data;
- how we categorize your personal data;
- the recipients of your personal data;
- the duration for which we store your personal data; and
- your rights as a data subject.

9.2 Rectification of your personal data

If you discover that any of the data we possess about you is incorrect or incomplete, you may ask us to rectify or supplement your personal data.

9.3 Erasure of your personal data

You may request us to erase your personal data from our records. Please note that in some cases we may be legally obliged to retain some of your personal data. We may also retain some of your personal data in order to defend our legal rights, avoid sending you unwanted materials in the future, and to keep a record of your request and our response.

9.4 Withdrawal of consent

You have the right to withdraw your consent at any time to our use of your personal data. Please note that a withdrawal of your consent does not affect the legality of the use of your personal data prior to your consent being withdrawn.

9.5 Portability of your personal data

You have the right to receive a copy of your personal data from us in a structured and commonly used machine-readable format. You may also request us to transfer such data to another data controller, provided that it is technically feasible and does not affect the rights and freedoms of other persons.

9.6 Objection to processing

In cases in which we rely on our legitimate interest to use your personal data, we must consider and acknowledge the interests and rights that you have under data protection law. Your privacy rights are always protected by appropriate safeguards and balanced with your freedoms and other rights. You have the right to submit an objection at any time to our use of your personal data based on our legitimate interest, as described above.

9.7 Restriction of processing

You have a right to request restriction of our use of your personal data, in particular if you believe that such processing is unlawful, or your data is inaccurate.

9.8 Complaint to the Office for Personal Data Protection

Additionally, you may also lodge a complaint pertaining to our processing of your personal data with the competent supervisory authority if you believe that your rights regarding our use of your personal data have been violated.

In Czech Republic, the supervisory authority is the Czech Office for the Protection of Personal Data (in Czech: *Úřad pro ochranu osobních údajů*), with registered office at Pplk. Sochora 27, 170 00 Praha 7, Czech Republic. More information can be found at: www.uouu.cz.

If the processing of your personal data relates to activities carried out in Greece, you can contact the Hellenic Data Protection Authority (in Greek: *Αρχή Προστασίας Δεδομένων Προσωπικού Χαρακτήρα*), with registered office at Kifissias 1-3, PC 115 23, Athens, Greece. More information can be found at: <https://www.dpa.gr/en>.

10 UPDATES TO THIS PRIVACY POLICY

We may modify or update this Privacy Policy from time to time. Any changes to this Privacy Policy shall become effective upon the publication of each update.

This Privacy Policy was last updated on **1. November 2024**.