

GDPR / PRIVACY POLICY

1. Introduction

TopResort GmbH takes the protection of personal data very seriously. This Privacy Policy provides information on **which personal data we process, for what purposes, on what legal basis, to whom such data may be disclosed, and what rights you have in relation to your personal data.**

This Privacy Policy applies to all individuals whose personal data we process, guests, website visitors, business partners and persons contacting us.

2. Data Controller

The controller of personal data is:

TopResort GmbH
Schubertstraße 4
5640 Bad Gastein
Austria

E-mail: petra.svejnohova@kosutholding.com
Phone: +420 778 131 575

The company is not obliged to appoint a Data Protection Officer (DPO). All enquiries regarding personal data protection may be addressed to the above contact details.

3. Categories of Personal Data Processed

We process the following categories of personal data:

- identification data (first name, last name, title),
- contact data (e-mail address, telephone number, postal address),
- data related to reservations and accommodation stays (dates of stay, number of guests, accommodation type),
- payment and invoicing data,
- data required by legal regulations (e.g. guest registration data under Austrian law),
- technical data related to website usage (IP address, cookies, device information).

4. Purposes of Data Processing

Personal data are processed for the following purposes:

- conclusion and performance of the accommodation contract,
- processing reservations and communication with guests,
- fulfilment of legal obligations (under Austrian guest registration, accounting and tax regulations),
- processing payments and issuing invoices,
- protection of the Provider's legal claims,
- operation and security of the website,
- responding to enquiries sent by e-mail or via contact forms.

5. Legal Basis for Processing

Personal data are processed based on the following legal grounds pursuant to Article 6 GDPR:

- **performance of a contract** (Art. 6(1)(b) GDPR),
- **compliance with a legal obligation** (Art. 6(1)(c) GDPR),
- **legitimate interests of the controller** (Art. 6(1)(f) GDPR), protection of property and legal claims,
- **consent of the data subject** (Art. 6(1)(a) GDPR), where required (e.g. marketing).

6. Recipients of Personal Data

Personal data may be disclosed to:

- IT and hosting service providers,
- reservation and payment service providers,
- accounting, tax and legal advisors,
- public authorities where required by law.

All processors are contractually bound to comply with data protection obligations.

7. Transfer of Personal Data to Third Countries

Personal data are generally processed within the European Union or the European Economic Area.

If, in exceptional cases, personal data are transferred outside the EU/EEA, such transfers shall only take place in compliance with GDPR requirements, in particular based on appropriate safeguards (e.g. EU standard contractual clauses).

8. Data Retention Period

Personal data are stored:

- for the duration of the contractual relationship,
- for the periods required by applicable legal regulations (accounting and tax laws),
- for the period necessary to protect legal claims.

After expiry of these periods, personal data are securely deleted or anonymised.

9. Cookies and Web Technologies

Our website uses cookies and similar technologies for the following purposes:

- ensuring proper functionality of the website,
- analysing website traffic,
- improving user experience.

You may manage or refuse the use of cookies via your browser settings or the cookie banner on the website.

10. Rights of Data Subjects

You have the right to:

- access your personal data,
- rectification of inaccurate or incomplete data,
- erasure of personal data (right to be forgotten),
- restriction of processing,
- data portability,
- object to processing,
- withdraw consent at any time where processing is based on consent.

11. Right to Lodge a Complaint

If you believe that the processing of your personal data violates applicable law, you have the right to lodge a complaint with the supervisory authority:

Austrian Data Protection Authority (Datenschutzbehörde)

Barichgasse 40–42

1030 Vienna

www.dsb.gv.at

12. Data Security

We have implemented appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, or damage.

13. Final Provisions

This Privacy Policy may be updated from time to time.
The current version is always available on the Provider's website.