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## PRIVACY POLICY

Welcome to our Privacy Policy page. Carefully read our Privacy Policy before submitting any personal data to us and signing a contract. Our Privacy Policy forms an integral part of the contracts signed with us.

In this Privacy Policy document, processing your personal data by Kadaka HUB OÜ is described regarding offering accommodation services. When processing personal data, we are following data processing principles in accordance with the current legislation, including with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council), and we guarantee that all personal data processing is legal, fair, and transparent, and data is processed in a secure manner.

**Personal data** means any data regarding a living individual who is identified or to be identified.

**Processing** means any operation performed upon personal data, such as collection, recording, organizing, structuring, storage, adaptation or alteration, retrieval, reading, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

**Data subject** means any living individual whose data is processed. Data subjects can be, for example, our customers, website visitors or other individuals who turn to us. In our Privacy Policy, the data subject is referred to as “You”.

### 1. Controller

Controller is the person who determines the purposes and means of the processing of personal data. In the context of this Privacy Policy, the controller is Kadaka HUB OÜ.

Kadaka HUB OÜ contacts:

Veerenni 40a-81, 10138 Tallinn  
Phone +372 680 0190  
[info@fundasset.ee](mailto:info@fundasset.ee)

### 2. Lawful Basis for and Purpose of Processing Personal Data

We process your personal data only on a lawful basis to offer services, sign contracts and perform contracts, but also to meet the requirements to the accommodation provider according to the legislation.

We also have the right to process your personal data in case of legitimate interest in processing your personal data (e.g., when protecting our rights in relation to contracts signed with you), unless this interest is outweighed by your interests and

basic rights and freedom that require protecting your personal data. In addition, we have the right to process your personal data based on your written consent.

The main purpose of processing your personal data is to collect data necessary to offer our services, to keep in contact regarding offering our services, and to sign and fill in contracts to offer our services.

The purpose of processing your data is also fulfilling obligations according to the legislation, including accountancy, tax reports, etc.

### 3. Collecting Personal Data

We collect and process personal data that you have personally submitted via email, phone, our website and booking system.

The personal data we collect might include, inter alia, the following data and their alterations: first and last name, personal identification number, date of birth, phone number, email address, postal address, citizenship, nationality, sex; the foregoing data concerning people who are staying with you (except for data regarding under-aged children); pets, the dates of your stay and your consumption habits in terms of water and electricity costs, the door log of the access code generated for you, additional services your ordered, payment data; special requests, letters, orders, communication submitted by you.

In case the user of the accommodation services is not a citizen of Estonia, another member state of the European Economic Area or Switzerland or a foreigner living in Estonia on the basis of a residence permit or right of residence, the collected personal data can also be the type, number and issuing country of the travel document.

The user of the accommodation service is responsible for any personal data provided to us.

### 4. Personal Data Transfer

We only transfer your data in the amount and format necessary to fulfill the purpose of data processing, offer accommodation services, sign contracts, or execute signed contracts.

Personal data is transferred to individuals who are offering the software service of our hostel booking services, currently Bidrento OÜ (the privacy policy of Bidrento OÜ concerning personal data processing is here: <https://bidrento.com/et/andmetootluse-teavitus/>); to individuals who are offering cloud services (e.g., zone.ee); to individuals whose software systems are used to automatically create contracts (e.g., PandaDoc Inc.); to individuals who are offering

email server services through which we can stay in contact (e.g., Microsoft); to individuals who are offering us door code and access solution system services and who process personal data necessary for the corresponding systems to work; individuals whose software is used to generate and send invoices (e.g., Directo).

Your personal data is only transferred in the amount deemed necessary to the administrating individuals of the hostel and our customer service (maintenance and managing companies, facility managers, sales consultants, customer service). In case of need, we have the right to transfer your personal data to our authorized processors whose access to the data is necessary for offering services to us (accountancy companies, collecting agencies).

According to law, we are also obligated to transfer personal data to certain third parties (e.g., tax authorities, auditors or other officials, court), and as an accommodation service provider, we are obligated to guarantee transmission of data to the Estonian Police and Border Guard Board and security authorities based on their request to fulfill their duty according to the rights or laws of the European Union.

Data is processed and stored on the European Union area.

## **5. Time Limits of Storing Personal Data**

We store your personal data for as long as necessary to process your data or based on our legitimate interest (incl. for protecting our rights), e.g., in terms of contracts signed with you, your personal data is stored for at least until the expiration date of the claims set in the contract. In general, data is stored for 5 years, unless our legitimate interest requires longer storage (e.g., the expiration of demands in case of intentional breach of contract is usually 10 years) or unless the legislation sets a longer storage period.

In terms of the expiration date of storing your personal data, we are following the terms and restrictions according to the legislation, e.g., personal data in accounting documents is stored for 7 years; as an accommodation service provider, we are obligated to store the data of the accommodation service users for two years as of the date of registration.

## **6. Your Rights Regarding Your Personal Data**

You have the right to:

- Request access to personal data regarding you,
- Request rectifying personal data,
- Request erasing personal data,
- Restrict processing personal data,

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- Object to processing personal data,
  - Request personal data transfer,
  - Avoid automated decision-making,
  - Withdraw your consent,
  - Submit a claim to a data protection authority ([www.aki.ee](http://www.aki.ee)).

In case you wish to end processing your personal data, obtain information regarding using personal data and transfer of personal data to you or to third parties in a commonly used format, submit your request to the contact address mentioned above. To prevent misuse of your personal data and rights, if possible, submit your request as a digitally signed document or personally signed document at the hostel. We will respond within a reasonable response time.

## 7. Changing Our Privacy Policy

We have the right to occasionally add changes to our Privacy Policy. Our up-to-date Privacy Policy is available on our website [www.kadakahub.ee](http://www.kadakahub.ee)