

# Data protection policy

**Updated on 14.07.2023**

## 1. General aspects

The following explains the Privacy Policy of our online offers, available on the website [www.dolphincamping.ro](http://www.dolphincamping.ro) or through our agents.

By "Offer" we mean our activity, which may consist of one or more services such as: provision of accommodation services for holidays and short periods, caravan parks, camping and camping sites, catering for events, organisation of travel packages, excursions, events, rental of leisure equipment, etc. which are offered and marketed through travel agencies or directly by our representatives, i.e. booking, brokering and selling of travel services, excursions, transport and accommodation, wholesale or retail, to the general public and/or commercial customers. Our offers are not intended for contracting by persons under the age of 18.

## 2. Presentation

We, GREEN DOLPHIN CAMPING, i.e. the company TOURING IMOBILIARE SRL with registered office in Bucharest, Sector 2, Str. Reinvierii nr. 3 - 5, Ground Floor, Room 7, registered at the Trade Register Office under no. J40/13621/2003, fiscal code no. RO 15807816, managed by Mr. Anastasiu Michael-Dragos operate the website based on the ownership of the domain [dolphincamping.ro](http://dolphincamping.ro) and are the controller of your personal data as a user of our Offers, within the meaning of data protection regulations.

### Our contact details:

Bucharest, sector 1,  
Av. Petre Cretu nr. 49, Corp C1, 012051  
phone :+40.314.33.44.48,  
fax :+40.314.33.44.48  
e-mail: [datepersonale\[at\]greenvillage.ro](mailto:datepersonale[at]greenvillage.ro)

Dolphin Camping respects your privacy and will process your personal data under technical and organisational conditions of adequate security in accordance with the Data Processing Policy, adopted in accordance with Regulation (EU) 2016/679 ("GDPR").

With this document we wish to inform you about (i) the categories of personal data we process for our online and offline Offers, (ii) the purpose of the processing and (iii) the legal basis of the processing.

## 3. Data Protection Officer

You can contact the data protection officer at [datepersonale@greenvillage.ro](mailto:datepersonale@greenvillage.ro).

## 4. Personal data

Personal data are any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, surname, identification number, location data, an

online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity. Information that cannot be linked to your identity (such as the number of views of an Offer or other statistical data) is not personal data.

In principle, you can consult our Offers without disclosing personal data.

We generally collect personal data directly from data subjects. If your personal data has been provided to us by a third party or has come to us in error, you have all remedies available to you under the law for deletion of the data.

### **5. Storage of personal data**

Your data is stored by us on specially protected servers. The data is protected by technical and organisational measures we have taken to prevent loss, destruction, unauthorised access, modification and dissemination. Access to your data is only allowed to a limited number of authorised persons. Authorised persons are responsible for the technical, commercial or operational management of the servers and the Activity.

Your data that is transmitted over the Internet is encrypted. We use SSL (Eng. Secure Socket Layer) certificate for data transmission.

### **6. Legal basis of processing**

If we obtain your consent to process your personal data, Article 6 para. (1) lit. a) of the GDPR serves as the legal basis for our processing.

If we process personal data because it is necessary for us to perform a contract or in a quasi-contractual framework (e.g. in order to send you a personalised Offer according to your needs), then Article 6 para. (1) lit. b) of the GDPR serves as a legal basis for us to process the data.

If we process personal data for the fulfilment of an obligation incumbent on us by law, then Article 6 para. (1) lit. c) of the GDPR serves as a legal basis for such processing.

Article 6 para. (1)(f) may serve as a legal basis for us if the processing of personal data is necessary to serve a legitimate interest of Dolphin Camping or of a third party, only insofar as your interests, fundamental rights and freedoms are not affected.

Through this Data Processing Policy, we will tell you specifically what our lawful basis is for each of the categories of personal data processed.

### **7. Erasure of personal data**

We generally delete personal data if they have been processed for a single purpose, which has been achieved. However, certain personal data may be subject to retention obligations for certain periods of time according to the applicable legal provisions. Dolphin Camping deletes or blocks access to personal data in a secure manner until such time periods have elapsed.

### **8. Data processing when accessing the Offers**

#### **ONLINE OFFERS**

Each time you access our Offers online, we collect the following data about the device used to access them: device used, IP address, web browser used and date and time of access. We

collect information on the Offer viewed, the version of the web browser, the operating system and the internet service provider. We also track the sites from which you were redirected to the Offer.

We use such processing in support of our legitimate interest to enable us to display those pages accessed in a manner compatible with the device you are using to access them. Among other things, we process this data in order to detect certain errors, to measure the interest generated by certain Offers and to adapt or improve the Offers. This purpose is justified by our legitimate interest, legally based on Article 6 para. (1) f) of the GDPR.

The IP address is only kept for the duration of the session and is deleted or encrypted when the session is closed. All data processed for this purpose are kept for limited periods of time.

#### OFFLINE OFFERS

Offline access to the Offers, materialized in one or more contracts for the provision of the services that make up the Offer you have purchased, entitle us to collect personal data necessary to conclude the contract and/or execute the contract.

To this end, for accommodation services we are obliged by applicable law to collect the name, surname, series and number of the identity card, home address, personal numerical code and signature of the person with whom we conclude the contract, respectively the name, surname and age of the companions of the person with whom we have concluded the contract, for the organisation of accommodation facilities, in accordance with the contractual obligations we have undertaken.

The legal basis for the processing of personal data in the context of the completion of arrival and departure notification forms is Article 6 para. (1) lit. b) and lit. c) of the GDPR and we understand that we are fulfilling our contractual and legal obligations as laid down by Dolphin Camping.

Both the person with whom we enter into the contract(s) with regard to our Offers and their accompanying persons are obliged to fill in their personal data in the arrival and departure notification form. The data thus filled in will be stored in physical format, in secure conditions by Dolphin Camping for the purpose of transmission to the recipients provided for by law, i.e. the public authorities entitled to receive this information. Dolphin Camping does not keep copies of these arrival and departure notification forms, nor does it process the personal data filled in by data subjects for other purposes.

The legal basis for the processing of personal data in the context of the completion of arrival and departure notification forms is Article 6 para. (1) lit. c) of the GDPR and we understand that we are fulfilling the legal obligations laid down for Dolphin Camping.

#### LEISURE SERVICES

For leisure activities, Dolphin Camping provides visitors with the necessary equipment (e.g. bicycles, kayaks, etc.) and also carries out safety and protection training on the use of the respective equipment, according to the options of our visitors. For this purpose we collect the name, surname, series, number, issuer and date of issue of ID and signature of visitors who have reached the age of 18 directly from the persons concerned.

The above data is collected in physical format and processed (including storage) from the

date of handing over the equipment and carrying out the training, until the end of the calendar week following the one in which the leisure activity was performed, except in cases where a legitimate interest of Dolphin Camping requires processing for longer periods of time.

We collect and process this data for the purpose of fulfilling our obligation to provide you with the recreational equipment, at the request of the data subject, and for the exploitation of any legitimate interest that Dolphin Camping may have in relation to the equipment rented or otherwise made available.

The legal basis for the processing of personal data in the context of the completion of arrival and departure notification forms is Article 6 para. (1) lit. b) and f) of the GDPR and we understand that we are fulfilling our legal obligations laid down for Dolphin Camping with regard to the security of data processing.

### **9. Use of cookies**

We use cookies to personalize content and ads and to analyze traffic. We also provide social networking, advertising and analytics partners with information about how you use our site. They may combine it with other information you provide or gathered from your use of their services. If you choose to continue using our website, you consent to our use of cookies.

We invite you to consult our cookie policy for your choices.

### **10. Data processing when submitting the application**

You have the possibility to apply for one of the positions open for employment at Dolphin Camping by using the e-mail addresses indicated on the website. Upon receipt of an application, your documents are sent by electronic means of communication. If your professional profile as shown in the documents submitted does not correspond to any of the open positions within our organization, then the documents submitted will be deleted from our records within 6 months from the date of completion of the recruitment process.

In any case, during the time period provided for the storage of documentation, you may exercise any of the rights we grant to data subjects under the law as detailed in this Policy.

In the context of submitting your application, the legal basis of the processing is based on the initiation by you of a contractual relationship, i.e. registration in the recruitment process for the performance of employment relationships and is governed by Article 6 (1) (b) sentence 2 of the GDPR.

### **11. Communication**

You can contact us directly using the address given on the website. On the other hand, Touring Immobiliare may regularly send you information by e-mail through our newsletter, to which you can subscribe.

### **CONTACT**

You can contact us using any of the means of contact we have set out in the introductory part of this Policy or at any of the addresses given on the website, i.e. by telephone, fax, e-mail, post or courier. In this context we will only process personal data related to the communication channel you choose, i.e.: telephone number, mailing address, e-mail address or fax number, associated with your name.

We will use the personal data thus collected exclusively for the purpose of responding to your request or to remedy the matter brought to our attention by any of these means.

We will use the personal data collected in this way only for the purpose of responding to your request or to remedy the matter brought to our attention by any of these means. This data will be processed for the purpose of possible further reference for a period of 12 months from the date of resolution of the request. In any case, during the time period provided for the storage of personal data in these communications, you have the possibility to exercise any of the rights that we guarantee to data subjects under the law, as detailed in this Policy.

An exception to the aforementioned processing time is where such requests create commercial or tax obligations on us. In such situations, personal data relevant to the resolution of the request will be kept in compliance with the applicable legal time limits.

The legal basis for the processing of personal data in communications with us is Article 6 para. (1) lit. b) of the GDPR.

### **NEWSLETTER**

By subscribing to the Newsletter, your e-mail address will be used for our own commercial communications. Our communications of this type may be personalised and individualised based on the information we hold about you. Please note that user interactions with messages received from us in the context of subscribing to the newsletter are monitored based on your consent.

Communications for this purpose are made through Dazoot Software SRL, the company that manages the [www.newsman.ro](http://www.newsman.ro) platform. Your e-mail address is disclosed to this company for the purpose of facilitating our communication to you. You can consult the Dazoot Software SRL Data Processing Policy by accessing the link <https://www.newsman.ro/page/privacy>.

You can unsubscribe from such commercial communications by using the "unsubscribe" button accessible from each of the communications we send. Accessing the unsubscribe option constitutes valid and sufficient withdrawal of your consent.

If Dazoot Software SRL systems do not see any interaction with the news sent to you for a continuous period of 180 days, your e-mail address will be deleted from the database, but you will retain the possibility to re-subscribe at any time.

### **SMS MARKETING**

We use the telephone number of persons who have expressly consented to this for real-time communication of resort news during their stay. The data thus processed, i.e. the telephone number, is included in the database of communications for Marketing for the entire period of the stay, starting from the date from which the data subject has expressly given his/her consent.

We collect the telephone number for this purpose directly from the data subject. Consent may be withdrawn at any time and with immediate effect by scanning the QR codes displayed for this purpose in the public areas of the resort.

The legal basis for the processing of personal data in communications is Article 6 para. (1) lit. a) of the GDPR, i.e. the consent of the data subject, which may be withdrawn at any time for

the entire duration of the processing, as set out above.

The processing of the telephone number for the purpose of sending SMS messages is carried out by our proxy for storage operations, the company NOOH MEDIA S.R.L. (CIF RO 27676978, Registration number: J40/10744/2010), under processing security conditions equivalent to those of Dolphin Camping.

#### TRANSACTIONAL SMS

This type of messages are communications through which Dolphin Camping keeps data subjects informed about updates on the Offers they have contracted. We collect the telephone number for this purpose directly from the data subject. Processing the telephone number for the purpose of sending transactional SMS messages for the period between the date of booking and the date of accommodation at Dolphin Camping.

The legal basis for the processing of personal data within the framework of communications is Art. 6 para. (1) lit. b) of the GDPR and we understand that we are fulfilling our contractual obligations to inform you about updates related to the Offers accessed through this means of communication.

The processing of the telephone number for the purpose of sending SMS messages is carried out by our proxy for storage operations, the company NOOH MEDIA S.R.L. (CIF RO 27676978, Registration number: J40/10744/2010), under processing security conditions equivalent to those of Dolphin Camping.

#### 12. Links to other pages

On our website you will find links to our social networks Facebook, Instagram, LinkedIn and our video communication channel hosted by YouTube. Accessing these connections takes you outside the website. Our data processing policy does not apply to these websites. You can find details of the data processing policy for each of these links at the following addresses:

Facebook: <http://www.facebook.com/policy.php>

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

Instagram: [https://help.instagram.com/519522125107875/?maybe\\_redirect\\_pol=0](https://help.instagram.com/519522125107875/?maybe_redirect_pol=0)

YouTube: <https://www.google.de/intl/de/policies/privacy/>

TikTok: <https://www.tiktok.com/legal/page/eea/privacy-policy/en>

#### 13. Personal data rights

According to the GDPR, data subjects have several rights. If you wish to exercise any of these rights or to obtain further information on the processing of personal data, please contact us. The main rights of data subjects are the following:

The right to be informed means that you are informed about the purpose, means and duration of the processing carried out by us on your personal data. By this Policy we consider that we have informed data subjects about the processing carried out. If you do not consider yourself fully informed by the publication of this policy and the information provided, we invite you to exercise one of the rights below:

The right of access means that you have the right to obtain access to the personal data processed by us and in relation to the purpose, means and duration of the processing. To exercise this right, we recommend that you complete the request available here.;

The right to rectify the data allows you to intervene under Article 16 of the GDPR whenever your personal data processed by us is inaccurate or incomplete. To exercise this right, we

recommend that you complete the request available here.

The right to restrict processing allows you, under the conditions set out in Article 18 of the GDPR, to request us to restrict the processing of certain personal data relating to you. To exercise this right, we recommend that you complete the request available here.

The right to object to processing gives you the opportunity to object to processing whenever the processing of your personal data by us is done on the sole legal basis for processing such data, your consent. To exercise this right, we recommend that you complete the request available here.

The right to data portability can only be exercised in relation to personal data processed by automated means and allows you to receive the data processed by us in a structured, commonly used and machine-readable format. To exercise this right, we recommend that you complete the request available here.

The right to erasure of data can be exercised within the limits described in Article 17 of the GDPR and allows you to request us, under certain conditions, to erase personal data concerning you. To exercise this right, we recommend that you complete the request available here.

#### **14. Further information**

We are obliged to respond to any of your requests to exercise a right within 30 days of receipt of a complete request. If you have not received a response from us within this time limit, you have the right to address the National Supervisory Authority for Personal Data Processing:

[www.dataprotection.ro](http://www.dataprotection.ro)

B-dul. G-ral. Gheorghe Magheru nr. 28-30, Sector 1, postal code 010336, Bucharest, Romania,

e-mail: [anspdc\[at\]dataprotection.ro](mailto:anspdc[at]dataprotection.ro)

fax: +40318.059.602.

We reserve the right to change, when we deem appropriate or required by law, our data protection practices and to update and amend the Data Processing Policy at any time. This Data Processing Policy is current as of the date it appears at the top of the document, and previous versions are accessible here and here.

#### **15. Cookies information**

This site uses cookies. Our site uses cookies to improve your experience and to display relevant content and ads when you browse the web. Continue browsing the site or choose to accept if you agree to the use of cookies. Alternatively, you can choose the types of cookies you agree to us using.

Cookies are small text files that can be used by websites to make their use more efficient.

The law states that we may store cookies on your device if they are strictly necessary for the operation of this website. For all other types of cookies we need your permission.

This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages.

You may, at any time, change or withdraw your consent from the Cookie Statement on our website.

Find out more about who we are, how you can contact us and how we process personal data in our Privacy Policy.

Your consent applies to the following domains: www.dolphincamping.ro

**Cookie Statement last updated on 7/24/23 by Cookiebot:**

**Required (2)**

**Necessary cookies help make a site usable by enabling basic functions such as page navigation and access to secure areas of the site. The site cannot function properly without these cookies.**

NAME	SUPPLIER	SCOPE	EXPIRY	TYPE
CookieConsent	Green Dolphin Camping	Stores the user's cookie consent state for the current domain	1 year	HTTP Cookie
test_cookie	Green Dolphin Camping	Used to check if the user's browser supports cookies.	1 day	HTTP Cookie

**Statistics (5)**

**Statistics cookies help site owners understand how visitors interact with sites by collecting and reporting information anonymously.**

NAME	SUPPLIER	SCOPE	EXPIRY	TYPE
_ga	Google	It records a unique code that is used to generate statistical data about how the visitor uses the website.	2 years	HTTP Cookie
_ga_#	Google	Used by Google Analytics to collect data on the number of times a user has visited the website as well as dates for the first and most recent visit.	2 years	HTTP Cookie



_gat	Google	Used by Google Analytics to speed up request rates	1 day	HTTP Cookie
_gid	Google	It records a unique code that is used to generate statistical data about how the visitor uses the website.	1 day	HTTP Cookie
collect	Google	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Session	Pixel Tracker

#### Marketing (5)

**Marketing cookies are used to track users from one site to another. The intention is to display relevant and engaging ads to individual users, so they are more valuable to advertising agencies and third party advertisers.**

NAME	SUPPLIER	SCOPE	EXPIRY	TYPE
_fbp	Meta Platforms, Inc.	Used by Facebook to deliver a range of advertising products, such as real-time bidding from advertisers as third parties.	3 months	HTTP Cookie
_gcl_au	Google	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services.	3 months	HTTP Cookie

ads/ga-audiences	Google	Used by Google AdWords to re-engage visitors who might become customers based on visitors' online behavior on websites.	Session	Pixel Tracker
IDE	Google	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.	1 year	HTTP Cookie
pagead/landing	Green Dolphin Camping	Collects data on visitor behaviour from multiple websites, in order to present more relevant advertisement – This also allows the website to limit the number of times that they are shown the same advertisement.	Session	Pixel Tracker