

Event: **8th Annual Meeting of Serbian Neurosurgical Society with international participation**

Place: **Belgrade, Republic of Serbia**

Time: **December 08-10, 2022**

Organiser: **Serbian Neurosurgical Society (SNSS)**

Event website: <http://snssmilitaryneuro.talkb2b.net/>

Official Housing Bureau: **ULTRA MARINE Ltd., Belgrade, Serbia**

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Privacy and Policy

Statement on Protection and Collection of Personal Data and their Use

ULTRA MARINE Ltd provides personal data protection by collecting only basic customer information necessary to meet business obligations. Collected customer personal data are safely stored and used only for the purposes for which they were collected. Access to the collected personal data is restricted to the authorised employees only.

All ULTRA MARINE Ltd. employees and business partners are responsible for respecting the principles of privacy protection.

Statement of WSPay usage

ULTRA MARINE Ltd uses WSPay for online payments. WSPay is a secure online payment system, real-time payments, credit and debit cards, and other payment methods. The WSPay customer and the merchant ensure secure enrollment and transfer of the tab data entered, as well as the PCI DSS certificate that WSPay has.

WSPay uses 256-bit encryption SSL certificate and TLS 1.2 cryptographic protocol as the highest degree of data protection and data security.

Statement on the Protection of Personal Data Transfer

Protection of personal data in accordance with the General Regulation on data protection of the European Parliament and Council No. 2016/679- Regulation and implementation of the General Data Protection Regulation.

WSPay as a credit card authorization and credit card performer processes personal data as a processing agent and processes personal data in accordance with the General Regulation on the Protection of Data of the European Parliament and Council No. 2016/679 and the strict rules of the PCI DSS LI Regulations on Protection of Registrations and data transfer.

WSPay uses 256-bit encryption SSL certificate and TLS 1.2 cryptographic protocol as the highest degree of data protection and data security.

Personal data used for authorization and collection purposes, or for performance of the contract or contract obligations, are considered confidential.

WSPay does not process personal data except for the purpose of executing authorization and billing.

WSPay warrants compliance with all the terms and conditions laid down in the applicable personal data protection regulations for personal data processing executives, and in particular the taking of all necessary technical, organizational and security measures, in particular with the PCI DSS LI Certified.

Scope of This Policy

This Privacy Policy describes how the ULTRA MARINE Ltd. and its Affiliates and Subsidiaries (“we” or “us”) collects, uses, consults or otherwise processes an individual’s Personal Data.

This Privacy Policy applies globally, but depending on where you live some specific provisions of this Privacy Policy may not apply to you.

For the purposes of EU Privacy Law, depending on the type of Personal Data processing described in this Privacy Policy, ULTRA MARINE Ltd may be operating as a sole Controller.

In some of the situations described in this Privacy Policy, the hotel where you made a booking and/or stay will also process your data as a (joint or sole) Controller. The hotel will be solely responsible for the processing activities for which it is the sole Controller.

ULTRA MARINE Ltd. is a company incorporated under Serbian laws, having its registered seat and its offices at Stevana Sremca 3, Belgrade, Serbia, telephone number: +381 11 3348-158.

We are committed to protecting the privacy of our users and customers.

This Privacy Policy is intended to inform you how we gather, define, and use Personal Data that you provide us with when using our websites or when relying on our hospitality services. Please take a moment to read this Privacy Policy carefully. Please note that if you plan to submit someone else’s Personal Data to us, for instance when making a booking on their behalf, you may only provide us with that person’s details with their consent and after they have been given access to information about how we will use their details, including the purposes set out in this Privacy Policy.

This policy includes a description of your data protection rights, including a right to object to some of the processing activities we carry out. Please note that your rights as a data subject may vary depending upon where you live.

EU Privacy Law requires us to be specific about our reasons and legal grounds for using your personal data. Accordingly, for the purposes of EU

Privacy Law only the information below describes the types of data we process, where we get your data from, the grounds we rely on to carry out the processing, and who we may share your data with. Except for the “processed data categories” sections set out in the information below, nothing is intended to bind us in respect of our non-EU users.

Protection of confidential transaction data

When entering payment card data, confidential information is transmitted over the public network in a protected (encrypted) form using SSL protocols and PKI systems, as currently the most modern cryptographic technology.

The security of data at the time of purchase is guaranteed by the payment card processor, so the complete billing process is performed in a secure environment. During the process of payment and after it, the card data is not available to our system.

- <https://www.mastercard.rs/sr-rs/consumers/find-card-products/credit-cards.html>

- <https://rs.visa.com/pay-with-visa/security-and-assistance/protected-everywhere.html>

Country-specific provisions

Please note that there may be local variations to this Privacy Policy in order to comply with local legislation.

Definitions

Affiliates and Subsidiaries: Any hotel, firm, partnership or other entity which directly or indirectly controls, is controlled by, or is under common control with ULTRA MARINE Ltd.

Controller: The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

EU Privacy Law: Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data (the "GDPR"), as well as any legislation and/or regulation implementing or created pursuant to the GDPR and the e-Privacy legislation, or which amends, replaces, reenacts or consolidates any of them, and all other national applicable laws relating to the processing of Personal Data and privacy.

Processor: A natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the controller.

Recipient: A natural or legal person, public authority, agency or another body, to which the Personal Data are disclosed, whether a Third Party or not.

Third Party: A natural or legal person, public authority, agency or body other than the data subject, controller, Processor and persons who, under the direct authority of the controller or processor, are authorized to process Personal Data.

Supervisory Authority: An independent public authority which is established by a Member State pursuant to Article 51 of the GDPR.

Personal Data: Any information relating to an identified or identifiable natural person ("Data Subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing: Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by

transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Privacy Shield: The EU-U.S. and Swiss-U.S. Privacy Shield legal framework, designed by the U.S. Department of Commerce and the European Commission and Swiss Administration to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring Personal Data from the European Union and Switzerland to the United States in support of transatlantic commerce.

Standard Contractual Clauses: Sets of standard contractual clauses for transfers as adopted by the European Commission for the international transfer of Personal Data.

Personal Data Breach: A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

Services Booking Process

1. Hotel booking process

In the context of the hotel booking process, we process your Personal Data for the purpose of

1. enabling you to reserve a room in the hotel of your choice;
2. verifying the availability of the hotel and to administer the booking;
3. sending you a booking confirmation;
4. sending you non-commercial pre-arrival emails. You may unsubscribe from pre-arrival emails at any time by clicking on the unsubscribe link in the emails sent to you.

Processed data categories

Address, date of arrival and departure, email address, first name/last name, first name/last name of the adult co-guest(s), payment card type, number and expiration date, telephone number, title

Source of data

Depending on the booking mechanism used:

- Directly from you through the online booking form
- From your travel agent
- From our call center

Ground for processing

Processing is necessary to take steps to enter into and perform a contract.

Recipients of data

- hotel of your choice
- IT service providers involved in the (online) booking process
- IT service providers
- Email communications service provider

Hotel Guests

1. Hotel check-in and check-out

When staying at the hotel of your choice, we will collect and process your Personal Data for the purposes of

- registering your arrival and departure at the hotel;
- obtaining a credit card guarantee or hotel deposit to ensure payment of your stay;
- managing payment of your stay;
- establishing, printing or sending an invoice for your stay;
- paying a commission to your travel agent (if applicable).

In the event you have booked a room in one of our hotels but do not show up – without cancelling – on the date of arrival communicated, we will process your Personal Data for the purposes of

- cancelling your stay and any other reservation you may have made;
- managing, processing and settling any outstanding payment that may be due.

Processed data categories

Address, bookings (hotel, restaurant, event, theatre, etc.), date of arrival and departure, email address, first name / last name, first name/last name of the adult co-guest(s), payment card type, number and expiration date, telephone number, title

Source of data

Depending on the booking mechanism used:

- Directly from you through the online booking form
- From your travel agent
- From our call center

Ground for processing

Processing is necessary to perform the contract you have with us.

Recipients of data

- hotel of your choice
- IT service providers
- Your travel agent, if applicable

Website Forms

Should you have a particular query or feedback, including the exercise of one of your rights under the GDPR, you may contact us through the contact forms available on our website. In such context, we may process your Personal Data for the purposes of handling and providing an answer to your query or request or to follow up on your feedback. We also provide other forms on our websites which may assist you in requesting a particular service from us, such as the best online rate guarantee form.

The information below describes the types of data we process for these purposes, where we get your data from, the ground we rely on to carry out the processing, and who we may share your data with.

Processed data categories

Address, email address, first name/last name, stay details, telephone number, and any other data you may decide to share with us in open comment boxes.

Source of data

Directly from you through the form

Ground for processing

Ad hoc consent obtained through the contact form

Recipients of data

- Other entities involved
- IT service providers

Analytics

We may use any data you provide to us for analytical purposes to optimize your experience, enhance our marketing, business and operational efficiency, create segments of our customers based on their Personal Data and tailor our offers and promotions to your preferences and consumption habits. In the context of such analytics, we analyze and may combine different data we hold about our guests, including:

- communications guests have with us;
- click-through rates for our marketing communications;
- our guests' behavior on our websites;
- bookings.

Processed data categories

Hotel stay details, address, bookings (hotel, restaurant, event, theatre, etc.), date of arrival and departure, title, first name/last name, first name/last name of the adult co-guest(s), email address,

Telephone number, Payment card type, number and expiration date,

Source of data

- Directly from you through the online booking form
- From your travel agent
- From our call center
- From our email analytics provider
- Directly from you when making your additional service/facility request with the hotel front desk or the concierge

Ground for processing

It is in ULTRA MARINE Ltd legitimate interest as a business to understand its guests' preferences and consumption habits. In this context, ULTRA MARINE Ltd business interests prevail over yours.

Recipients of data

- Other entities involved
- IT service providers
- Analytics service provider

Social Media and Online Reviews

We may process your Personal Data obtained through social media platforms (including Facebook, Instagram, LinkedIn and Twitter) or online reviews (including on TripAdvisor) concerning our services for the purposes of:

- addressing your questions or complaints;
- monitoring our online reputation;
- improving our services and identifying opportunities on which we can focus.

Some of our social media pages allow users to submit their own content. Please remember that any content submitted to one of our social media pages can be viewed by the public and you should be cautious about providing certain personal information (e.g., financial information or address details) via these platforms. We are not responsible for any actions taken by other individuals if you post personal information on one of our social media platforms (e.g., Facebook or Instagram). Please also refer to the respective privacy and cookie policies of the social media platforms you are using.

Source of data

Directly from you through publicly accessible social media pages, online booking channels or other (review) websites

From our online reputation monitoring service provider

Ground for processing

It is in ULTRA MARINE Ltd legitimate interest as a business partner to understand its guests' preferences and consumption habits. In this context, ULTRA MARINE Ltd business interests prevail over yours.

Recipients of data

- Online reputation monitoring service provider

Protect user privacy

On behalf of Ultra Marine Ltd., we undertake to protect the privacy of all of our customers. We collect only the necessary, basic data on customers / users and data necessary for business and informing users in accordance with good business customs and in order to provide quality service. We give customers a choice including the ability to decide whether or not to delete them from the mailing lists used for marketing campaigns. All user / customer data is strictly kept and only available to employees who need this information to do the job. All employees of Ultra Marine Ltd. are responsible for respecting the principles of privacy.

Your Rights – Under EU Privacy Law

If you are in the EU, EU Privacy Law grants specific rights, summarized below, which you can in principle exercise free of charge, subject to statutory exceptions. These rights may be limited, for example if fulfilling your request would reveal Personal Data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. To exercise any of your rights, you can file a request via email snssmilitaryneuro@snss.org.rs

Should you have unresolved concerns, you have the right to lodge a complaint with a Supervisory Authority where you live or where you believe a breach may have occurred. We encourage you to come to us in the first instance but, to the extent that this right applies to you, you are entitled to complain directly to the relevant Supervisory Authority.

1. Right to withdraw consent

Wherever we rely on your consent, you will be able to withdraw that consent at any time you choose and at your own initiative by logging in to your account on our website (if you have one) or by contacting us at office@ultramarine.rs. The withdrawal of your consent will not affect the lawfulness of the collection and processing of your data based on your consent up until the moment where you withdraw your consent. Please note that we may have other legal grounds for processing your data for other purposes, such as those set out in this Privacy Policy.

2. Right to access and rectify your data

You have the right to access, review, and rectify your Personal Data. You may be entitled to ask us for a copy of your information, to review or correct it if you wish to rectify any information like your name, email address, passwords and/or any other preferences, you can easily do so by logging in to your account on our website (if you have one) or by contacting us at snssmilitaryneuro@snss.org.rs. You may also request a copy of the Personal Data processed as described in this Privacy Policy.

3. **Right to erasure**

In accordance with EU Privacy Law, you have the right to erasure of your Personal Data processed by us as described in this Privacy Policy in case it is no longer needed for the purposes for which the Personal Data was initially collected or processed or in the event you have withdrawn your consent or objected to processing as described in this Privacy Policy and no other legal ground for processing applies. Should you wish to have your Personal Data erased, please file a request via email at snssmilitaryneuro@snss.org.rs.

4. **Right to restriction of processing**

Under certain circumstances described in EU Privacy Law, you may ask us to restrict the processing of your Personal Data. This is for example the case when you contest the accuracy of your Personal Data. In such event, we will restrict the processing until we can verify the accuracy of your data.

5. **Right to object to processing**

Under certain circumstances described in EU Privacy Law, you may object to the processing of your Personal Data, including where your Personal Data is processed for direct marketing purposes.

6. **Right to data portability**

Where you have provided your data directly to us and where the processing is carried out by automated means and based on your consent or the performance of a contract between you and us, you have the right to receive the Personal Data processed about you in a structured, commonly used and machine-readable format, and to transmit this data to another service provider.

Your Rights – Non-EU Users

Depending on where you are located you will have different rights in respect of your Personal Data and we will comply with the relevant requirements of applicable laws and this Privacy Policy. California Privacy Rights

If you reside in California, you have the right to ask us one time each year if we have shared Personal Data with third parties for their direct marketing purposes. To make a request, please send us an email

at snssmilitaryneuro@snss.org.rs or write to us at the address listed below. Indicate in your letter that you are a California resident.

Russian Citizens

In accordance with Russian Federal Law "On Personal Data" No. 152-FZ we collect, record, systematize, accumulate, store, update (renew and modify), and extract Personal Data about Russian citizens using databases located in the territory of the Russian Federation. If you indicate that you are a Russian citizen of the Russian Federation, we will process your Personal Data in compliance with this requirement and your profile will be maintained on databases in the Russian Federation. If you do not indicate that you are a citizen of the Russian Federation, we are not able to process and maintain your Personal Data under these requirements and will not be liable for that. You are solely responsible for indicating the country of your citizenship. Information containing Personal Data of Russian citizens may be transmitted from the Russian Federation to countries that ensure an adequate level of protection for Personal Data, including member states of the European Union and other countries which Russian law recognizes as ensuring adequate to protection, and also to other countries that may not ensure adequate level of protection for Personal Data. By submitting information to us on our sites and apps, submitting forms to us, or registering on our sites, programs and apps, or making reservations, you grant us consent to process your Personal Data.

Security Measures

Appropriate technical and organizational measures are implemented in order to ensure an appropriate level of security of your Personal Data, including but not limited to encryption techniques, physical and IT system access controls, obligations of confidentiality, etc.

In the event Personal Data is compromised as a result of a Personal Data Breach we will make the necessary notifications, as required under applicable laws.

What Rules Apply to Children?

We do not knowingly collect or solicit Personal Data from anyone under the age of 18 or knowingly allow such persons to book a room in one of our hotels.

In the event we learn that we have collected Personal Data from a child under the age of 18 without verification of parental consent, steps will be taken promptly to remove that information. If you believe that we have or may have information from or about a child under 18 years of age, please contact us at snssmilitaryneuro@snss.org.rs.

How Is Your Personal Data Shared with Third Parties?

We only share or disclose information as described herein, including with Third Parties.

Your Personal Data will also be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of the Controller(s) legitimate interests in compliance with applicable laws. In addition, we may share your Personal Data and other information with a successor to all or part of our business, where this is in our legitimate interests in facilitating a business sale and in this context our business interests prevail over yours. For example, if parts of our business or assets are sold, we may disclose user information as part of that transaction, subject to applicable law.

International Data Transfers

If you are in the European Economic Area (EEA), the data that we collect from you as described in this Privacy Policy may be transferred to and stored at a destination outside the EEA, including for the purposes of processing that data by selected Processors, in order to facilitate the ULTRA

MARINE Ltd business. Countries outside the EEA may not have laws which provide the same level of protection to your Personal Data as laws within the EEA. Where this is the case we will put in place appropriate safeguards to ensure that such transfers comply with EU Privacy Law, either by putting in place Standard Contractual Clauses approved by the European Commission as ensuring an adequate protection or by ensuring that the transfer is done to an organization that complies with Privacy Shield in case the transfer is made to the United States of America.

In this respect, please note that ULTRA MARINE Ltd, adheres to the E.U.-U.S. and Swiss-U.S.

Privacy Shield Framework. In compliance with the E.U.-U.S. and Swiss-U.S. Privacy Shield Principles, ULTRA MARINE Ltd commits to resolve complaints about your privacy and our collection or use of your Personal Data.

ULTRA MARINE Ltd has further committed to refer unresolved privacy complaints under the E.U.-U.S. and Swiss-U.S. Privacy Shields to the American Arbitration Association, <http://go.adr.org/privacysshield.html>. Finally, in certain limited circumstances and as a last resort, it may be possible for individuals to invoke binding arbitration before the Privacy Shield Panel to be created by the U.S. Department of C