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ESTONIAN DATA PROTECTION INSPECTORATE,
LATVIAN DATA STATE INSPECTORATE,
LITHUANIAN STATE DATA PROTECTION INSPECTORATE

Baltic data protection authorities performed joint supervision of Radisson Blu branded hotels

Estonian, Latvian and Lithuanian data protection authorities performed joint supervision of Radisson Blu branded hotels in the Baltic States. The aim of the joint supervision was to investigate the hotel's compliance with applicable data protection legislation. As a result of investigation data processing in the hotels is in accordance with personal data protection laws generally, but the data protection authorities will issue the joint recommendation in order to facilitate data protection in practice.

The authorities focused on the requirements of personal data retention, video surveillance and direct marketing. There is the central hotel guest reservation system among all the Radisson Blu branded hotels but the privacy policy is determined by each hotel in accordance with local legal requirements and in accordance with Rezidor's group privacy policy. Data processing in the hotels is managed separately in each hotel, there is no common data protection policy among the nine hotels in the Baltic States.

There were several shortcomings in the hotels, therefore the data protection authorities will issue the joint recommendation to Radisson Blu branded hotels:

The legislation requires that a controller of personal data must immediately delete personal data which are not necessary for achieving the purposes thereof, unless otherwise provided by law.

Tourism Acts of the Baltic countries requires that visitor's cards must be stored for one, two or five years (depending on local act), but the practice has not been the same in the hotels.

Surveillance equipment may be used for the protection of persons or property only if this does not excessively interfere the legitimate interests of the data subject. It must be sufficiently clear communication of the fact of the use of the surveillance equipment and of the name and contact details of the controller of the data. There were too small or hardly visible (transparent) labels in the entrances and there were not presented any details of data controller. Also there were hotels that marked only the entrance of the building but the surveillance equipment is used all over the building. In order to inform the guests adequately about the use of video surveillance it's highly recommended to mark all the areas that are under surveillance with labels.

Direct marketing is arranged in accordance with personal data protection rules and Law on Information Society Services. Marketing letters and advertisements are issued only by Rezidor Group to persons who have consented to receive such marketing material.

The aim of the joint and general investigations in a certain company is raising overall awareness of personal data protection. The purpose of this joint investigation was to ensure that individuals can travel in the Baltics without forgetting their data protection at home. Such investigation is also a good tool for raising awareness of the data subject's rights regarding the personal data processing. Deeply integrated Baltic economy demands supervisory authorities also to apply and perform cross

border cooperation in personal data protection field. Baltic data protection authorities will continue the cross border cooperation actions in 2013.

Kind Regards,

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