

STANDARDS FOR THE PROTECTION OF MINORS IN CRACOWDAYS

1. **DEFINITIONS** For the purpose of this document, the meaning of the following terms has been clarified: e) A child is any person under 18 years of age including children with disabilities and children with special educational needs. f) A foreign adult is any person over 18 years of age who is not the child's parent or legal guardian. g) Harming a child means committing a crime against it. h) Crime against a child – all crimes that can be committed against adults can be committed against children, in addition to crimes that can only be committed against children (e.g., sexual abuse under Article 200 of the Penal Code). Due to the nature of tourist facilities, where seclusion can easily be achieved, the crimes that are most likely to occur on their premises will be crimes against liberty (Art. 189 of the Penal Code, Art. 189a of the Penal Code and Art. 191a of the Penal Code), against sexual freedom and morality, in particular rape (Art. 197 of the Penal Code), sexual exploitation of mental disability or disorder and vulnerability (Art. 198 of the Penal Code), sexual exploitation of dependence or critical situation (Art. 199 of the Penal Code), sexual exploitation of a minor under 15 years of age (Art. 200 of the Penal Code), grooming (seduction of a minor by means of remote communication – Art. 200a of the Penal Code, as well as offences involving violation of bodily integrity (Art. 217 of the Penal Code).

2. **PREAMBLE** Bearing in mind the contents of the UN Guiding Principles on Business and Human Rights, recognising the important role of business in ensuring respect for the rights of children, in particular the right to protection of their dignity and freedom from all forms of harm, CRACOWDAYS adopts this document as a model of policies and procedures in the event of suspected harm to a child who is staying in CRACOWDAYS. This document is also adopted to prevent any threats against children. We will implement the child protection policy in our hotel chain through the following principles: f) CRACOWDAYS conducts its operational activities with the utmost respect for human rights, particularly the rights of children as persons particularly vulnerable to harm. g) CRACOWDAYS recognises its role in conducting socially responsible business and promoting desirable social attitudes. h) CRACOWDAYS particularly emphasises the importance of the legal and social obligation to notify law enforcement authorities whenever a crime is suspected of having been committed against children, and undertakes to train its staff in this regard. i) CRACOWDAYS undertakes to educate its staff on the circumstances indicating that a child staying at the facility may be harmed and on how to respond quickly and appropriately to such situations. j) One of the forms of effective child harm prevention is identifying the child staying at the facility and its relationship to the adult with whom it is staying at the facility. Staff shall take all possible steps to carry out the identification of the child and its relationship to the adult with whom it is in the facility, based on procedure, clearly defined rules, and good practice.

3. **PRINCIPLES TO ENSURE SAFE RELATIONS BETWEEN CRACOWDAYS STAFF AND MINORS, IN PARTICULAR IN RELATION TO INAPPROPRIATE BEHAVIOUR TOWARDS MINORS** e) All persons working with children must be safe for them, which means, among other things, that their employment history should indicate that they have not harmed any child in the past. f) Every person employed by CRACOWDAYS for work related to education, leisure and childcare, including those employed under an employment agreement, a civil-law agreement, an apprentice, an intern or a volunteer, regardless of the person's nationality and age, must be compulsorily checked against the Sex Offender Register (<https://rps.ms.gov.pl/>). Each time, the HR department verifies the personal data in the register before the employee delegated to the above activities signs the agreement. A printout is placed in the personal file of the person verified. The verification is repeated annually. All staff employed to work with children, should submit a declaration that they have no criminal record and that no proceedings for acts against children are pending. In the case of using the services of external entities, a provision should be included in the agreement with such entity, containing a declaration from that entity with the obligation to obtain the consents of its employees, which will provide a real possibility for CRACOWDAYS to enforce an appropriate standard in terms of checking the employees by that entity for their safety for

children. Such a provision should provide for the possibility to control the fulfilment of the obligation, e.g. on pain of immediate termination of the agreement and a contractual penalty. Any person employed by a subcontractor and working with children is required to provide a printout from the "Sex Offenders Register".

4. RULES AND PROCEDURES FOR THE IDENTIFICATION OF THE MINOR STAYING IN THE FACILITY AND ITS RELATION TO THE ADULT WITH WHOM IT IS STAYING IN THE FACILITY If the reservation indicates the stay of a child, the receptionist is obliged to register all persons who are in the room with the child by filling in individual registration cards. The child alone can not be registered if not accompanied by the adult even if having the permission to stay in the Hotel signed by their parents/ legal guardian. The person who has custody of the child is obliged to complete the child's details and degree of relationship on the registration card. If the child's guardian is not the legal guardian, the receptionist cannot check in the guests on the hotel premises until the degree of relationship is clarified or the permission for the child to stay is received from the legal guardian. The receptionist should immediately inform the immediate supervisor of the situation. It should be kept in mind that grandparents, in the case of full parental rights held by the parents, are not legal guardians as understood in the Family and Guardianship Code and it is reasonable for them to have the consent of the parents with regard to the above situation, unless the kinship and behaviour of the child is not in doubt.

5. RULES AND PROCEDURES FOR REACTING IN THE EVENT OF A JUSTIFIED SUSPICION THAT THE WELFARE OF A MINOR PRESENT ON THE PREMISES OF CRACOWDAYS IS IN DANGER Any employee having a justified suspicion that a child staying in CRACOWDAYS facility is being harmed is obliged to inform their immediate supervisor, who decides on a personal response and contact with the Police depending on the dynamics of the situation and circumstances. Justified suspicion of child abuse occurs when: f) A child has disclosed abuse to a member of staff at the facility. g) Staff member has observed the abuse. h) A child shows signs of abuse (e.g. scratches, bruises) and when asked responds incoherently and/or chaotically and/or becomes embarrassed or there are other circumstances that may indicate abuse e.g. finding child pornography in an adult's room. i) Disturbing noises of child abuse/possibility of abuse or exploitation are heard from the hotel room. j) Disturbing behaviour by an adult towards a child is observed. In a situation of increasing tension between an adult suspected of possibly harming a child or having an unclear relationship with a child, the main thing to do is to: e) Ensure safety for oneself. f) Ensure safety for a child. g) Inform the intervention patrol. h) De-escalate tensions and have a calm conversation.

6. RULES OF CONDUCT FOR HOTEL STAFF REGARDING ABUSE OF CHILDREN WITH DISABILITIES OR SPECIAL EDUCATIONAL NEEDS CRACOWDAYS employees usually do not have knowledge of the type of disability of the minor guest, the pattern of behaviour that characterises a person with a particular disability and the specifics of its individual relationship with the parent/guardian. An important factor that makes it difficult to identify symptoms that may indicate that a child is being abused is the timing of the employee's contact with the minor during the performance of their duties. In their tasks, however, they should pay particular attention as in the case of minor visitors with disabilities to: • visible injuries (bruises, burns, bites, etc.) whose origin is difficult to explain, injuries are in various stages of healing, • unreliability, inconsistency of the child's explanation of the injury, • anxiety evident in the child's interaction with the parent/guardian or other adult, phobias, • somatic disorders (stomach aches, headaches, vomiting, nausea), • isolation from other people, especially parents/guardians, • depression symptoms, self-harm, suicidal thoughts, • inconclusive or contradictory information or refusal by the parent/guardian to explain the reasons for the child's injuries, • constant humiliation, insults to the child by the parent/guardian, use of pejorative terms, vulgarity towards the child, • parent/guardian crossing acceptable boundaries in physical contact with the child, • disturbed contact of the parent/guardian with reality, e.g. reacting inappropriately to the situation, expressing themselves incoherently and other disturbing, unusual behaviour. A member of hotel staff who, in the course of their duties, observes

disturbing behaviour in relation to a child and/or its parent/guardian should immediately report it to their immediate supervisor.

7. PROCEDURES AND PERSONS RESPONSIBLE FOR SUBMITTING NOTICES OF SUSPECTED OFFENCES AGAINST A MINOR AND NOTIFYING THE GUARDIANSHIP COURT Whenever there is a suspicion that a crime has been committed or a crime has actually been committed, the CRACOWDAYS is obliged to cooperate with the law enforcement authorities and to file the appropriate notifications. In the event of situations not described in this procedure, each employee should be guided primarily by their own safety, the welfare of the child and other good practices.

8. RULES OF PREPARING THIS STAFF FOR THEIR APPLICATION AND THE MANNER OF DOCUMENTING THIS ACTIVITY Employees employed on the basis of the employment agreement, a civil-law agreement sign an appendix to their agreement, which confirms that they have familiarised themselves with the procedure. Persons supervising employees of subcontractors are obliged to communicate the scope of this procedure.

9. PERIODIC AUDIT OF THE IMPLEMENTED SECURITY STANDARDS An evaluation of the implemented security standards and their possible update to the applicable legislation will be carried out periodically at least once every two years by the Management CRACOWDAYS

10. HOTEL SIGNAGE Information on the child protection standards in force at CRACOWDAYS can be found in the public area of the hotel and in the information folders located in the hotel rooms. The aforementioned standards are available in a full and simplified version.

11. ANNEXES Annex 1. Template of consent for a child staying with a person who is not a parent or legal guardian
Annex 2. Template of statement regarding relations with minors English version
Annex 3. Information sheet on “Standards of protection of minors in CRACOWDAYS

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CHILD CARE AUTHORISATION

I residing in
..... (name of parent/legal guardian) (address of parent/legal guardian) holding ID card (series and number)
..... being a parent/legal guardian, having the right of custody of
..... with PESEL number
..... (child's full name) (child's ID number) residing in
.....
..... (child's address) authorise Mr./Ms
..... residing in
..... (full name of person to be authorised) (address of person to be authorised) holding ID card (series and number) to provide care, manage day-to-day affairs and emergencies related to the care of the above-mentioned child during its stay in the hotel
..... on (full hotel name, place)
..... (time span of the hotel stay) At the same time, I declare that there is a degree of kinship between the person authorised to provide care and my child: (state the degree of kinship) I am aware of the criminal liability for making a false statement under Article 233 § 6 of the Act of 6 June 1997 – Penal Code.⁶

..... (signature of parent/legal guardian)

Art. 233 of the Penal Code (extract) Whoever, in giving testimony which is to serve as evidence in court proceedings or other proceedings conducted on the basis of a law, gives false testimony or conceals the truth shall be subject to the penalty of deprivation of liberty for a term of between 6 months and 8 years. The provisions shall apply mutatis mutandis to a person who makes a false statement if a provision of the Act provides for the possibility of taking the statement under pain of criminal liability.

STATEMENT REGARDING MINORS

Guest's name:

Check-in date:

On the basis of the procedure for the protection of minors in force in accordance with Article 22c(3) (2). Act of 13 May 2016 on Counteracting Threats of Sexual Offences and Protection of Minors, I give the names and surnames of the minors accompanying me and the nature of the relationship between me and the minors:

Child's name:.....

Type of relationship:.....

Guest's signature:

Providing data is necessary to check in at the Hotel. The consequence of failure to provide the data may be the need for the Hotel staff to identify the child and his/her relationship with the adult with whom he/she is staying at the Hotel and/or refuse to check in at the Hotel. If the identification of the above data is prevented, the hotel staff is entitled to notify the Police. The above actions are aimed at protecting children from harm, please respect the applicable rules.

INFORMATION CLAUSE

I. Personal Data Controller

The administrator of personal data is CRACOWDAYS z siedzibą w Krakowie pod adresem: 31-477 ul.Boh.Wietnamu 5/78, NIP: 9451160650, REGON: 120289648, tel.: + 48604460860 (dalej: „Administrator”).

II. Contact for Data Protection

Contact in matters of personal data protection is possible at the e-mail address: reservation@cracowdays.com or at the correspondence address indicated in point I.

III. Purpose and legal basis of the processing

Your personal data The data will be processed for the following purposes: implementation of the procedure for the protection of minors against abuse, introduced on the basis of Article 22c(3)(2). Act of 13 May 2016 on Counteracting Threats of Sexual Offences and Protection of Minors (Article 6(1)(c) of the GDPR) implementation of the Administrator's legitimate interest, consisting in demonstrating compliance with the rules for the protection of minors referred to above (Article 6(1)(f) of the GDPR).

IV. Categories of data we process

We process the following personal data: your name, the names of your children, the nature of your relationship with your children.

V. Information on the requirement/voluntariness of providing data

Providing personal data is necessary to use the hotel services. The consequences of not providing data are indicated above.

VI. Period of data processing

Personal data will be processed for a period of time equal to the processing of data contained in the registration card (vide information clause on the back of the registration card).

VIII. Data recipients

The data will not be passed on to third parties, except for the authorities authorised to intervene in the protection of minors.

IX. Rights of data subjects

You have the right to access your data and the right to request their rectification (if they are inconsistent with the facts), deletion, restriction of processing (in cases provided for by applicable law). To the extent that the basis for the processing of your personal data is the legitimate interest of the Administrator, you have the right to object to the processing of your personal data. To the extent that the basis for the processing of your personal data is consent, you have the right to withdraw your consent. The withdrawal of consent does not affect the lawfulness of the processing until the consent is withdrawn. You also have the right to transfer your personal data, i.e. to receive it from the Administrator in a structured, commonly used and machine-readable format. The right to data portability does not apply to data that constitutes a trade secret, must not adversely affect the rights and freedoms of others, including trade secrets or intellectual property, and will be exercised to the extent technically possible. The first copy of the data is free of charge. In order to exercise the above-mentioned rights, please contact the Administrator at the correspondence address indicated in point I. or at the e-mail address indicated in point II.

X. Right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with the supervisory authority, which is the President of the Office for Personal Data Protection (00-193 Warsaw, 2 Stawki Street, e-mail: kancelaria@uodo.gov.pl)

XI. Automated decision-making

The data provided by you will not be used for automated decision-making (including profiling).

XII. Transfer of data to third countries or international organisations

The data will not be transferred outside the EEA.

IF YOU NEED **HELP**, INFORM THE HOTEL STAFF

