

# Elounda S.A. Hotels & Resorts Privacy Policy

## Introduction

Elounda S.A. Hotels & Resorts takes the issue of safeguarding your privacy very seriously. We have created this Privacy Policy in order to better familiarize you with the information we collect from hotel guests and visitors to the Elounda S.A. Hotels & Resorts website, and the way in which Elounda S.A. Hotels & Resorts uses this information to better serve the needs of our Guests are committed to safeguarding the privacy of our website visitors.

This policy applies where we are acting as a data controller with respect to the personal data of our website visitors; in other words, where we determine the purposes and means of the processing of that personal data.

In this policy, "we", "us" and "our" refer to **Elounda S.A. HOTELS & RESORTS**.

## Cookies

### About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

### Cookies that we use

We use cookies for the following purposes:

**authentication** - we use cookies to identify you when you visit our website and as you navigate our website

**status** - we use cookies to help us to determine if you are logged into our website

**personalisation** - we use cookies to store information about your preferences and to personalise the website for you.

**security** - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally.

**analysis** - we use cookies to help us to analyse the use and performance of our website and services and

**cookie consent** - we use cookies to store your preferences in relation to the use of cookies more generally

### **Cookies used by our service providers**

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

### **Managing cookies**

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

<https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);

<http://www.opera.com/help/tutorials/security/cookies/> (Opera);

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

<https://support.apple.com/kb/PH21411> (Safari); and

<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

### **While Browsing Our Web Site**

While in the process of browsing our web site, you also provide us with information that does not reveal your personal identity. We use this aggregated, anonymous data mainly for editorial purposes, but we do not connect it to any Personal Information, such as your name or address.

While browsing our web site, you may also wish to put in a specific "Information Request" about one of our hotels, resorts or residential properties, or you may wish to participate in one of our on-line surveys or promotions. To respond to this request or to participate in our various programs, we may ask you for Personal Information, such as your name, postal code, e-mail address, and phone number.

In the event you choose to provide us with this information, we will only use it for the purpose we have specified to you. We will only e-mail you if you want us to, and you can choose a number of alternate methods by which to receive a reply to a request. Your transmittal of your Personal Information shall constitute your acknowledgment and agreement to the terms and conditions contained in this Privacy Policy. If you are uncomfortable providing this information over the Internet, you can always call our Reservations Office for more details.

If you wish, you may also submit your e-mail address in order to be placed on a subscription list or to receive other information about our products and services. You will be placed on a subscription list unless you indicate your desire not to be included. In deciding whether or not to join such lists, please note that they are only used for internal purposes and we do not sell or rent our subscription lists to anyone. In the event you choose to join one of our subscription lists, you may ask to be removed from the list at any time. You will always have the ability to accept or decline any form of communication from Elounda S.A. Hotels & Resorts.

### **How we use your personal data**

The term "**Personal Data**" refers to any information that can be used to identify you as an individual. It can include, among other things, your name, address, age, gender and personal financial history. What is the purpose of collecting Personal Information?

### **To Provide Superior Customer Service to our Guests**

Personal Information is collected to assist us in making your reservation and providing the services you request at any of our properties, to ensure we meet your needs while you are staying with us and/or to allow us to contact you in relation to matters that arise from your stay with us. By keeping certain stay related Personal Information on file, such as information regarding guest history and itemized spending, guests of Elounda S.A. Hotels & Resorts have the ability to confirm prior transactions and reconcile statements or invoices.

Reservations can also be made by calling our Reservation Office or by contacting a particular hotel or resort directly. When you make a reservation we may ask you for Personal Information such as your name, address, telephone number and method of payment. We may also obtain from you any room preferences or special requests. Personal Information obtained by our Reservation Office or hotels will be sent in a secured communication to the relevant hotel. Confirmation of your reservation will be provided directly to you, generally by e-mail.

During your stay, we record your itemized spending to properly assemble your folio, which sets out your room rate and other expenses billed to your room. We also record this information to comply with financial reporting requirements, including those imposed by auditors and government regulators. We may also collect certain information as required by local laws (e.g. passport number). Information particular to your stay may also be stored (i.e. health issues, payment difficulties, special requests, service issues). This stay specific information is stored in the property management system at the particular hotel where you stayed and is combined with information from previous visits that you have made to that hotel. Certain information regarding your service preferences is also stored centrally by us and may be made available to other Elounda S.A. Hotels & Resorts properties through the Elounda S.A. Hotels & Resorts guest history database. You may advise the hotel if you do not want personal preferences shared.

In addition, we may retain the content of any document (including letters, comment cards, electronic documents such as e-mails and other similar forms of communication) that you send us before, during or following your stay. This information may be shared with employees of the hotel.

### **To Keep Our Guests Informed**

We may use the Personal Information you provide to send you newsletters regarding our properties and to advise you of promotions or to inform you of offers or other information that may be of interest to you. If you do not wish to receive information from Elounda S.A. Hotels & Resorts you may indicate your wishes on your registration card when you stay with us or you may advise one of our properties or send an e-mail to: **reservations@elounda-sa.com**

### **For Marketing Research**

Finally, we may wish to contact Guests to conduct surveys or focus groups to receive your views of our properties and service delivery. Occasionally we will combine information from a number of Guests to better understand trends and Guest expectations. When this occurs, all identifiers are removed and the aggregate information cannot be linked to any specific Guest.

### **Data Types in General**

We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

We may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

We may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your use of our website and

services. The legal basis for this processing is consent and our legitimate interests, namely the proper administration of our website and business.

We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include name, address, telephone number, email address. The source of the service data is you or your employer. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent and our legitimate interests, namely the proper administration of our website and business].

We may process information contained in any enquiry you submit to us regarding goods and services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and services to you. The legal basis for this processing is consent.

We may process information relating to our customer relationships, including customer contact information ("**customer relationship data**"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our services to customers. The legal basis for this processing is consent and our legitimate interests, namely the proper management of our customer relationships.

We may process information relating to transactions, including purchases of goods and services that you enter into with us or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the

purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business.

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless we prompt you to do so.

### **Providing your personal data to others**

We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy. Information

about our group of companies can be found at <http://www.elounda-sa.com> .

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

Financial transactions relating to our website and services are handled by our payment services provider, Alpha Bank, <http://www.alpha.gr> . We will share transaction data with our payment services provider only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services provider privacy policies and practices at <https://www.alpha.gr/page/default.asp?id=5727&la=2>. When making a financial transaction, you will receive from us a link form to complete, that includes your wish to buy Service. After accepting it, you will be redirected to a secure payment gateway provided by Alpha Bank where you will enter your payment details and confirm the payment. Upon payment, you will be automatically redirected back to our website to view your reservation overview. Additionally an email confirmation of your reservation details will also sent to you. We retain a log file of transactions on our web site, excluding your credit card information. We will then use that information to assist in any inquiries about your transaction. We also occasionally combine information from a number of web visitors in a way that does not identify any user, in order to identify user patterns.

We may disclose your enquiry data to one or more of those selected third party suppliers of goods and services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.

In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where



such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

### **Storage of personal data**

At the Hotel or Resort Each Elounda S.A. Hotels & Resorts managed property goes to great measures to ensure that all Personal Information is kept in a secure location, be it a **database or filing cabinet**. Furthermore, we take steps to ensure that only designated individuals have access to this information.

### **In Our Guest Reservation System**

In order to serve you better we also store certain guest information in our Central Reservation System ("CRS"), a platform located in a local data centre in our Property.

The stored information includes guest name, address and phone numbers. We may also store certain information regarding your service preferences. When you make a reservation at another Elounda S.A. Hotels & Resorts property, this information is sent to that hotel or resort. We also store other transaction information in our CRS, including the number of stays you have had at properties managed by Elounda S.A. Hotels & Resorts and the number of nights of each stay. This information may be available to another Elounda S.A. Hotels & Resorts property when you make a reservation at that property, in order to serve you better.

### **In Our Marketing Database**

Elounda S.A. Hotels & Resorts maintains a database of Guest information which is used for marketing, promotion and research purposes. Any information sent to guests provides a clear notice of how to discontinue receiving promotional materials. Information that is not secure

### **Retaining and deleting personal data**

This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

**We will retain your personal data as follows:**

**account data, profile data, service data, enquiry data, customer relationship data, transaction data, notification data** will be retained for a minimum period of 6 months, and for a maximum period of 5 years.

Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **Amendments**

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

We may notify you of significant changes to this policy by email.

## **Your rights**

In this Section, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

### **Your principal rights under data protection - GDPR are:**

the right to access;

the right to rectification;

the right to erasure;

the right to restrict processing;

the right to object to processing;

the right to data portability;

the right to complain to a supervisory authority; and

the right to withdraw consent.

You have the right to **confirmation** as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data.

Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.

You have the right to have any inaccurate personal data about you **rectified** and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the **erasure** of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

In some circumstances you have the right to **restrict** the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to **object** to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to **object** to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to **object** to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

**To the extent that the legal basis for our processing of your personal data is:**

consent; or

that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section.

**Our details**

This website is owned and operated by **Elounda S.A. HOTELS & RESORTS**.

We are registered in Greece, and our registered office is at **Elounda, Pigadakia, PC:72053, Crete - Greece**

Our principal place of business is at **Elounda, Pigadakia, PC:72053, Crete - Greece.**

**You can contact us:**

by post, to the postal address given above;

using our website contact form;

by telephone, on the contact number **+30 28410 68000**

by email, using the email address published on our website from time to time.

**Data protection officer**

Our data protection officer's contact details are: **Elounda S.A. HOTELS & RESORTS, Data Protection Officer, Elounda, Pigadakia, PC:72053, Crete – Greece Tel: +30 28410 68000 e-mail: [dpo@elounda-sa.com](mailto:dpo@elounda-sa.com)**