

# Privacy Policy

We are committed to safeguarding the privacy of our customers, website visitors and in-house application users; this policy sets out how we will treat your personal information.

## Introduction

This policy refers to personal data, which is defined as information concerning any living person that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

## Personal Data

### PERSONAL INFORMATION WE COLLECT

We collect personal information at every touch point or guest interaction, and in conducting every aspect of our business, we may collect personal information. This personal information may include: your name, mailing address, billing address, email address, phone number, information related to your reservation, stay or visit to a property; participation in a membership or loyalty program (Sunnytime B2B); participation in a contest, sweepstakes, or marketing program (even if you do not stay at one of our hotels); information related to the purchase and receipt of products or services; personal characteristics, nationality, income, passport number and date and place of issue; travel history; payment information, such as your payment card number and other card information, as well as authentication information and other billing and account details associated with mobile billing; guest preferences; marketing and communication preferences; information about vehicles you may bring onto our properties; reviews and opinions about our Portfolio of properties (if they are identified or associated with you); frequent flyer or travel partner program affiliation and member number; hotel, airline and rental car packages booked; groups with which you are associated for stays at hotels; information provided on membership and account applications; and other types of information that you choose to provide to us or that we may obtain about you.

In addition, we collect other personal information in certain cases, such as:

*Surveys:* We may request demographic data or other personal information in customer surveys.

*On-property Collection:* We collect additional personal information during registration/check-in at our properties, including such information as may be required by local laws. We may also use closed circuit television and other security measures at our properties that may capture or record images of guests and visitors in public areas, as well as information related to your

location while on our properties (via keycards and other technologies). We may also use closed-circuit television and other technologies that record sound or video for the protection of our staff, guests and visitors to our properties where permitted by law. In addition, we may collect personal information in connection with on-property services, such as concierge services, health clubs, spas, activities, child care services, equipment rental

*Event Profiles:* If you plan an event with us, we collect meeting and event specifications, the date of the event, number of guests, details of the guest rooms, and, for corporate events, information on your organization (name, annual budget, and number of sponsored events per year). We also collect information about the guests that are a part of your group or event. If you visit us as part of a group, we may have personal information about you provided to us by the group and may market to you as a result of your stay with a group or attendance at an event in accordance with your preferences as permitted by law. If you visit us as part of an event, we may share personal information about you with the event planners, as permitted by law. If you are an event planner we may also share information about your event with third-party service providers who may market event services to you as permitted by law.

*Social Media:* If you choose to participate in social media activities or offerings, we may collect certain information from your social media account consistent with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates and friend list. We may also allow you to enter into contests to provide photos, such as of your stay with us, which you may share with your connections on social media for votes, shared offers or other promotions.

*Employment Applications:* If you choose to apply online for employment with Aldemar, please see our [Applicant Privacy Notice](#).

*Hotel WiFi Service:* When you use WiFi service at our properties, the personal data you provide for access and authentication may be collected and used by us and third parties such as authentication gateway partners and WiFi service providers to facilitate your use of the WiFi service; to remember your registration information; for technical support purposes; and for service improvements and analytics. The personal data collected may include name, room number, and device information (including operating system/version, hardware model and unique device identifiers such as MAC address). Absent your consent, personal data collected during this process will not be used for direct marketing purposes. In some countries, local laws may require that personal data collected during this process be shared with government authorities.

In addition to the information we collect from you directly, we may also infer information about you based on the information you provide to us or from Other Information we collect.

## PERSONAL INFORMATION WE COLLECT FROM THIRD PARTIES

We may also collect information about you from third parties, including information from our airline, payment card, and other partners; from your social media services consistent with your settings on such services; and from other third-party sources that are lawfully entitled to share your data with us. We use and share this information (and may append this information to the other information we have on file for you) for the purposes described in this Statement.

## USE OF PERSONAL INFORMATION COLLECTED ABOUT YOU

We are obligated to collect certain data, including your name, address, payment information, and, in certain countries, travel document information, in order to process your reservation. Failure to provide this information will result in our inability to process your reservation.

*Meeting and Event Planning:* We may use your personal information to provide you with information about meeting and event planning.

*Marketing and Communications:* Where permitted we may use your personal information to provide or offer you newsletters, promotions and featured specials, as well as other marketing messages in accordance with any communications preferences you have expressed. We use your information to provide in-stay messaging, account alerts, and reservation confirmations; to send you marketing messages; and to conduct surveys, sweepstakes, prize draws, and other contests. We may provide these communications via email, postal mail, online advertising, social media, telephone, push notifications, in-app messaging, and other means (including on-property messaging, such as your in-room television). With your consent, we also use user-generated content (such as photos) from social media services to deliver display advertising or on our website and app.

*Service Improvements:* We may use your personal information to improve Aldemar's services and to ensure that our site, products, and services are of interest to you. We also use your personal information to provide you with the expected level of hospitality in-room and throughout our properties.

*Data Correctness, Analytics and Personalization:* We may aggregate your personal information with data from third-party sources for purposes of keeping information up to date and analytics. We also rely on information from third parties in order to provide better, more personalized service. For example, if you connect your social media services or other accounts to our services, we may use this information to make your experiences with us more personal and social, or share and use it as described elsewhere in this Statement.

## PERSONAL INFORMATION WE SHARE

In order to offer you the expected level of hospitality and to provide you with the best level of service, we may share your personal information among members Aldemar Resorts, our service providers, and other third parties as set forth in detail below:

*Group Events or Meetings:* If you visit Aldemar as part of a group event or meeting, information collected for meeting and event planning may be shared with the organizers of those meetings and events, and, where appropriate, guests who organize or participate in the meeting or event.

*Business Partners:* We may partner with other companies to provide you with products, services, or offers based upon your experiences at our properties and may share your information with our business partners accordingly. For example, we may help to arrange rental cars or other services from our business partners, and share personal information with our business partners in order to provide those services. We may also share your personal information, such as your email address, with our corporate travel partners to help them assess compliance with travel policies or participation in special rate plans or to engage in co-branded marketing with our corporate travel partners. We may also share personal information with select third parties, such as our airline and payment card partners, to allow us and our partners to deliver advertisements to our shared and prospective customers. We and our partners may be able to provide more relevant offers to you based upon information that we share about your experiences at our properties, as well as information in your

*On-property Services:* We may share personal information with third-party providers of on-property services such as concierge services, WiFi access providers, spa treatments, golf, or dining experiences.

## OTHER INFORMATION

When you visit and interact with Aldemar websites and app, we collect other information that does not directly identify you about your use of the site, such as a catalog of the site pages you visit, and the number of visits to our sites (“Other Information”). We use Other Information, as well as data received from third parties, to deliver you email, online (on our sites and other sites) and mobile advertisements.

We use cookies and other technologies (such as “pixel tags,” “web beacons,” “clear GIFs”, links in emails, JavaScript, device IDs assigned by Google or Apple, or similar technologies) to collect this information. If you want to remove or block Cookies from your device at any time, you can update your browser settings (consult your browser's "help" menu to learn how to remove or block Cookies). Aldemar is not responsible for your browser settings. You can find good and simple instructions on how to manage Cookies on the different types of web browsers at [www.allaboutcookies.org](http://www.allaboutcookies.org). Note for EEA and UK-Residents: If you are based in Europe, you also can adjust your Cookie preferences by adjusting the Cookie

Settings through the Cookie Consent Manager, which can be found here: Cookie Preferences.

You can learn more about interest-based advertising and how to opt out of our vendors' and other advertisers' use of Cookies to tailor content or advertising to you by visiting <http://optout.networkadvertising.org/#/> and <http://www.aboutads.info/choices>.

At this time, we do not respond to Do Not Track signals or other, similar mechanisms.

We may use information we have collected and aggregated, or anonymized personal information received from third parties, to understand more about our users (for example, we may use aggregated information to calculate the percentage of our users who have a particular telephone area code). This includes demographic data, such as date of birth, gender and marital status, inferred commercial interests, such as favorite products or hobbies, and other information we may collect from you or from third parties.

Because Other Information does not personally identify you, such information may be disclosed for any purpose where permitted by law. In some instances, we may combine Other Information with personal information. If we do combine any Other Information with personal information, the combined information will be treated by us as personal information in accordance with this Statement.

#### SENSITIVE INFORMATION

The term "sensitive information" refers to information related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, or sexual orientation, genetic information, criminal background, and any biometric data used for the purpose of unique identification. In some jurisdictions, mobile phone numbers, location data, and information contained on identity documents also are considered sensitive information.

We do not generally collect sensitive information unless it is volunteered by you or unless we are required to do so pursuant to applicable laws or regulations. We may use health data provided by you to serve you better and meet your particular needs (for example, the provision of disability access).

#### PERSONAL INFORMATION FROM CHILDREN

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not to allow your children to submit personal information without your permission.

## MOBILE AND LOCATION-BASED SERVICES

We provide mobile app that can be downloaded to your smartphone or mobile device. These app have a variety of functionalities that enhance the customer experience. In addition to providing services, our app may collect personal and Other Information that will be used in accordance with this Statement. We provide a link to this Statement to customers prior to their downloading of our app.

If you allow our mobile app to access your location information on your device, our mobile app may use your mobile device's Global Positioning System (GPS) technology and other technology (such as wireless transmitters known as beacons) to provide you with information and offers based on the location of your device. Beacons allow us to collect information about your location within participating hotels by communicating with mobile devices that are in range. We may use this location information to enhance your on-property experience by delivering push notifications and other content to your mobile device, providing navigation assistance as you move around our locations, and sending you information and offers about products, services, or activities we believe may be of interest to you. We may share this information with third parties, including business partners and service providers, to provide information, offers, and services that may be of interest to you. You may prevent or limit collection of location information by changing the settings in the Aldemar app, or by changing your device's settings.

We offer all of these mobile and location-based services only to the extent permitted by applicable local laws.

## LINKS TO THIRD-PARTY WEBSITES AND SERVICES

Our site and our mobile applications may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If you provide information on and use third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

Aldemar may also partner with a limited number of Internet providers to offer Internet access to our guests. Your use of on-property Internet service is subject to the third-party Internet provider's terms of use and privacy policy. You can access those terms and policies using the links on the service sign-in page, or by visiting the Internet provider's website.

### **Consent**

Through agreeing to this privacy notice you are consenting to Aldemar Resorts processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing [dpo@aldemar.gr](mailto:dpo@aldemar.gr) or writing to us, see last section for full contact details.

## Disclosure

Aldemar Resorts may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. Aldemar Resorts requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR.

We do not broker or pass on information gained from your engagement with us without your consent. However, we may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. We may also enforce our Terms and Conditions, including investigating potential violations of our Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Aldemar Resorts, our clients and/or the wider community.

### ADDITIONAL PROVISIONS APPLICABLE TO PROCESSING OF PERSONAL INFORMATION OF EEA RESIDENTS

For individuals residing in the EEA, this outlines certain additional information that Aldemar is obligated to provide to you, as well as certain rights you have with respect to the processing of your personal information, pursuant to applicable local laws. This parameters will control to the extent it conflicts with any provision in the main body of this Statement.

Data Protection Officer: Aldemar's Data Protection Officer may be contacted by email at [dpo@aldemar.gr](mailto:dpo@aldemar.gr)

The particular legal basis for the processing of your personal information is based on the purpose for which such information was provided or collected:

- *On-property Collection:*

When you make a reservation and when you stay at one of our hotel properties, we process your name, address, contact information, along with the details of your stay (arrival and departure day and time, vehicle information and information regarding others traveling or staying with you), on the basis of our contractual relationship with you.

We collect certain additional personal information during registration/check-in at our properties (such as national ID or passport information), as necessary to comply with our legal obligations.

We use closed circuit television and other security measures at our properties that may capture or record images of guests and visitors in public areas, as well as information related to your location while on our properties (via keycards and other technologies) for the protection of our staff, guests and visitors to our properties.

We process personal information in connection with on-property services (such as concierge services, health clubs, spas, activities, child care services, equipment rental), in order to provide the services to you and for our business interests including for marketing, service improvements, analytics and service personalization,

*Event Profiles:* We process the personal information obtained in connection with your event on the basis of our contractual relationship with you and for our business interests, including for marketing, service improvements, and analytics and service personalization,

*Social Media:* Participation in Aldemar's-sponsored social media activities and offerings is voluntary - we process information obtained from social media participation on the basis of your consent and in furtherance of our related business interests, including for marketing, service improvements, and analytics and service personalization.

*Direct Marketing:* We use your personal information to send you marketing messages on the basis of your consent. You may withdraw your consent for direct marketing communications at any time by contacting us at [dpo@aldemar.gr](mailto:dpo@aldemar.gr) or by following the unsubscribe instructions in the marketing message.

### **Retention Policy**

We will process personal data during the duration of any contract and will continue to store only the personal data needed for ten years after the contract has expired to meet any legal obligations. After ten years any personal data not needed will be deleted.

### **Data Subject Rights:**

Under the applicable law, you have the following rights:

*Access, Correction and Erasure Requests:* You have the right to:

ask us to confirm whether we are processing your personal information

receive information on how your data is processed

obtain a copy of your personal information

request that we update or correct your personal information

request that we delete personal information in certain circumstances

*Right to Object to Processing:* You have the right to request that Aldemar cease processing of your personal information:

for marketing activities, including profiling



for statistical purposes

where such processing is based on our legitimate business interests, unless we are able to demonstrate a compelling legitimate basis for such processing or we need to process your personal information for the establishment, exercise or defense of a legal claim

*Right to Restrict Processing:* You have the right to request that Aldemar limit the processing of your personal information:

while Aldemar is evaluating or in the process of responding to a request by you to update or correct your personal information

where such processing is unlawful and you do not want Aldemar to delete your data

where Aldemar no longer requires such data, but you want us to retain the data for the establishment, exercise or defense of a legal claim

where you have submitted an objection to processing based on our legitimate business interests, pending our response to such request

Where we limit the processing of your personal information pursuant to your request, we will inform you prior to re-engaging in such processing.

*Right to Withdraw Consent:* You have the right to withdraw your consent to any processing that we conduct solely based on your consent (such as sending direct marketing materials to your personal email account). You may withdraw your consent to marketing activities by following the instructions on any marketing emails, or contacting [dpo@aldemar.gr](mailto:dpo@aldemar.gr).

Segmentation (also referred to as profiling) and Automated Decision Making: We use personal information to divide large groups of consumers into sub-groups of consumers (known as segments) based on some type of shared characteristics such as geography, behavior, or demographics. With your consent, we make automated decisions, meaning without human interference, using segmentation and/or your specific personal information to offer you certain benefits based on your characteristics (such as discounted room rates or other special offers based on your geography, behavior, or demographics). For example, if you travel frequently during the year to hotels in Skafidia, Iliia, we may send you special offers for Aldemar Resorts in Skafidia, Iliia.

#### **Data storage**

Data is held in Greece using different (multiple) servers. Aldemar Resorts does not store personal data outside the EEA.

### **To access what personal data is held, identification will be required**

Aldemar Resorts will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Aldemar Resorts is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to [dpo@aldemar.gr](mailto:dpo@aldemar.gr) or by phoning +30 2897027200 or writing to us at the address further below.

### **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Aldemar Resorts or its partners, you have the right to complain to Aldemar Resorts. We will work to respond and resolve your complaints within the timeframe provided by the applicable law. Otherwise you will be notified of the delay and the expected response date. You can also raise complaints or concerns about the use or other processing of your Personal Information with the body regulating data protection in your country. In Greece, this is the Hellenic Data Protection Authority (details are available at <https://www.dpa.gr> ).

### **Disclaimer of warranty**

The information on the website may be changed without prior notification and without incurring any obligation or liability for us.

We will use reasonable efforts to include accurate information on our website. HOWEVER, WE MAKE NO WARRANTIES OR REPRESENTATIONS AS TO THE ACCURACY, COMPLETENESS, TIMELINESS, NON-INFRINGEMENT, OR FITNESS FOR ANY PARTICULAR PURPOSE OF THE INFORMATION GIVEN. IN NO EVENT WILL WE ACCEPT ANY LIABILITY TO ANY PARTY FOR DAMAGES, WHETHER DIRECT, INDIRECT, SPECIAL, CONSEQUENTIAL, PUNITIVE OR OTHER FOR ANY USE OR INABILITY TO USE THIS WEB SITE OR ITS CONTENTS.

### **Changes**

Any changes to this privacy policy will be communicated promptly at this location.

Please check the privacy policy periodically to review any changes that may have been made.

The details for each of these contacts are:

Aldemar Resorts, attention of the Mr Ioannis Bolakakis

Limenas Hersonissou,

Crete,

Greece,

70014

Telephone +30 2897027200 or email [dpo@aldemar.gr](mailto:dpo@aldemar.gr)

Data Protection Officer

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