

PERSONAL DATA POLICY OF THE DATA CONTROLLER UNDER THE FIRM
HOTEL LA SIGNORA

This Personal Data Processing Policy (hereinafter referred to as the "Policy") describes how your personal data is processed and in particular the conditions for its collection, storage and use by the CONTROLLER.

In order to read the full text of our policy select: "PROTECTION POLICY"

DEFINITIONS:

In this Policy the terms used have the same meaning as that attributed to the GENERAL REGULATION OF PERSONAL DATA PROTECTION. For convenience, the following terms are set forth here in:

1. **DATA CONTROLLER:** Anyone that determines the purpose and manner of processing personal data, such as a natural or legal person, public authority or service or any other organization.
2. **DATA PROTECTION OFFICER:** The Data Protection Officer (DPO) facilitates the compliance of the controller and the processor with the provisions of the GDPR and mediates between the stakeholders.
3. **DATA PROCESSOR:**The natural or legal person, public authority, service or other entity that processes personal data on behalf of the Data Controller.
4. **DATA SUBJECT:** The natural person to whom the data refers, and whose identity is known or can be verified.

Data Controller

Here in after you will find the Controller's full Identity and contact details (here in after refer red as "the Controller" or "the Hotel"):

LOCATION LOURDATA

VAT No.094128310

WEBSITE www.lasignorahotel.gr

Register No. 123089134000

E MAIL info@lasignorahotel.gr

TEL.2671031157

Data Processor/ Data Protection Officer (DPO): Gerasimos Belitsis

EMAIL DPO:belitsisgerasimos@gmail.com

The Controller in the context of exercising its business activities, processes personal data of its customers, staff and suppliers.

For this reason, it has adopted and implements, the GENERAL DATA PROTECTION REGULATION OF NATURAL PERSONS (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, (hereinafter the General Regulation) and the Greek Law 4624/2019. In addition we take the appropriate technical and organizational measures to ensure that the processing of your personal data is carried out in accordance with the applicable legal framework, both by the Controller and by third parties, associates or staff.

For any issue regarding the processing of personal data, please contact the DPO at the following email address: belitsisgerasimos@gmail.com

A. DATA WE COLLECT

For the execution of our business activity and the provision of our services we are obliged and we collect with your consent the absolutely necessary personal data of yours and specifically:

- 1. CUSTOMER DATA:** first name, last name, patronymic, VAT number, tax office, full address (street, number, postal code, city) invoicing, mobile phone number, e-mail address, place of origin, time of arrival and time of departure, eating habits, number of children, escort details, identity card, passport, credit card number and banking institution, room number, vehicle registration number, COVID 19 certificate or other document.

Your credit / debit card details will be requested upon completion of your order, provided you choose the relevant payment method and will be used exclusively for their electronic transmission through the secure environment of Alpha Bank SA for the completion of your payment and only. The Company does not store any credit / debit card information in its electronic systems or in a physical file.

Cardholder certification may require the transfer of your card details to a third party provider or bank partner that completes the card payment process.

We may also collect information about you from third parties, including information from your airline, payment card and other partners, your social media services and other third-party sources that have a legal right to share your data with us. We use and share this information (and we may add this information to your personal file that we keep) for the sole purpose described in the present.

- 2. EMPLOYEE DATA:** first name, last name, patronymic, VAT number, tax office, full residence address (street, number, postal code, city), mobile phone number, e-mail address, legal residence permit in the country,

work permit, salary, age, curriculum vitae, previous service and certificate of marital status, social insurance number, bank account, military record, Responsible Statement that no criminal conviction is pending against them, vehicle registration number, health booklet, COVID 19 results or other communicable diseases.

3. **DATA OF SUPPLIERS (NATURAL PERSONS):** first name, last name, patronymic, VAT number, Tax Office, full registered office address mobile phone number, e-mail address (e-mail), bank account number.
4. **MINOR'S DATA:** We would also like to assure you that for a minor under the age of 18 we collect data for the purposes stated in this policy, in accordance with applicable law and always with the permission and consent of their parents / guardians, which [data] are the absolute necessary for their safe accommodation in our HOTEL but also in our country (age, gender, eating habits). As a parent or legal guardian, do not allow your children to communicate personal information without your permission.
5. **CCTV DATA:** The Controller has installed a closed circuit of cameras (CCTV) for continuous recording of image and sound with the ability to focus, in specific areas where warning sign has been placed.

These areas are at the entrance of the Hotel and reception, as well as in the parking.

The purpose of the installation and operation of the closed circuit television is the security as well as the safeguarding and protection of the legal interests of, the customers, the employees, the suppliers and the Hotel from illegal actions of third parties.

For this reason, we use closed circuit television (CCTV) and security cameras in specific areas of the Hotel and there is the relevant warning sign, in order to secure the facilities and assets of the Hotel, to safeguard the vital interests of its employees, customers' safety, and detection and prevention of malware actions.

The material that is recorded, is kept for a period of 150 days at which time it is deleted automatically.

6. **SENSITIVE PERSONAL DATA:** Such data relate to your racial or ethnic origin, political views, religious or philosophical beliefs, trade unions, health, sex life or sexual orientation, genetic information, criminal record. Generally, we do not collect sensitive personal data, unless provided with your consent or as required by applicable laws or regulations. We may use the health data provided by you so as to better serve and meet your special needs (for example, providing access to people with disabilities).

7. MOBILE TELEPHONY: We provide mobile applications that can be downloaded to your smart phone or mobile device. These applications have a variety of features that enhance the customer experience. In addition to providing services, our applications may collect personal and other information that will be used in accordance with this Policy. For example, in order to make a reservation or change a reservation.

It is possible to use the location information to enhance your experience at the HOTEL, by providing push notifications and other content on your mobile device, navigation assistance as you move around in order to send you information and offers about products, services or activities we believe may be you are interested.

We may share this information with third parties, including business partners and service providers, in order to share information, offers and services that may be of your interest. You can prevent or restrict the collection of location information by changing your device the settings.

8. LINKS TO WEBSITES AND THIRD SERVICES: Our website and our mobile applications may contain links to third party websites. If you provide information and use third party websites, you apply the privacy policy and terms of services on those websites. We encourage you to read the privacy policies of the websites you visit before submitting personal information and we inform you that we are not responsible for the collection, use, maintenance, sharing or disclosure of data and information by these services.

B.PURPOSES OF PROCESSING

For the execution of our business activities, the provision of our services, the evaluation of the employees and their safety we are obliged and we collect with your consent, your necessary personal data for the following purposes:

- For booking management and other hosting services.
- For the signing of employment contracts and other legal documents necessary in accordance with applicable law.
- To satisfy requests regarding your accommodation (eg room preferences).
- To manage the operational needs of your accommodation in the HOTEL such as:
 - Monitoring of services (eg room phone, mini bar, room service, etc.).
 - Management of lists with personal customer data for operational purposes, e.g. daily arrival and departure lists of customers and a list of special category customers (eg VIP guests, etc.).
- Management of customer databases for statistical purposes, to improve our services to you before, during and after your accommodation eg food, wifi.
- Management of requests for deletion of your data and management of customers' complaints.

- For resolving and managing legal issues.
- For the safety of our employees and customers as well as for the security of the Hotel equipment and facilities.
- To safeguard the vital interests of our employees customers as well as their security and fraud prevention.

C. LAWFUL PROCESSING

The personal data that you provide with your explicit consent to the Controller, can only be processed when there is a legal issue.

Lawful reasons for processing your personal data are:

- The execution of our business activity and the provision of our services.
- The ability to contact you about your reservation, the compliance with laws, the issuing of legal disputes.
- The preservation and protection of the legal interests and public health, of our customers, employees and suppliers as well as their safety from diseases, illegal acts.
- Compliance with tax, insurance and labor legislation.

D. DATA TRANSMISSION

For the fulfillment of the above-mentioned purposes of processing of your personal data, the Data Controller may disclose or transmit your personal data to third party providers of electronic services and technology services, hospitals, doctors, judicial, police, tax authorities, insurance companies.

If you request to receive an electronic invoice via email, with a summary of the goods and services we have provided to you during your accommodation, this information will be communicated to the payment card provider. If you participate in a corporate billing plan and use a corporate payment card, your payment card provider can share this summary with your employer.

We may share personal information to third-party service providers within the HOTEL, such as concierge or room services, WiFi access providers, spa treatments or restaurants.

E. COOKIES

We use cookies and other technologies (such as "pixel tags", "web beacons", "clear GIFs", email links, 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).

F. SECURITY OF PERSONAL DATA

The Data Controller ensures and implements appropriate technical and organizational measures in order to securely process your personal data and

prevent accidental loss or destruction and unauthorized and / or illegal access to them such as, use, modification or disclosure. In any case, the internet operation and the fact that it is free to anyone, does not guarantee that unauthorized third parties will never be able to violate the applicable technical and organizational measures, having access and possibly using personal data for unauthorized and / or illegal purposes.

The Data Controller undertakes the obligation to keep with absolute confidentiality the file of personal data that he has collected in electronic and printing/paper format in the context of the execution and provision of his services, as indicatively, during your electronic reservation or at your arrival, but solely for the above-mentioned purposes.

The Data Controller keeps your Data in a specific room with limited and controlled access. The Data Controller has installed a CCTV camera into this room as well as in the Hotel's Lobby for the control of the critical hotel's areas by the Shift Responsible staff.

The Data Controller keeps records in a specially designed COMPUTER ROOM with limited and controlled access.

G. DURATION OF DATA RESERVATION

The data storage period is based on the following specific criteria depending on each case:

- When processing is required as an obligation by provisions of the applicable legal framework, your personal data will be stored as long as the relevant provisions require.
- When processing takes place under an agreement, your personal data is stored as long as necessary for the performance of the contract and for the establishment, exercise, and / or support of legal claims under the contract.
- For various promotional / advertising activities (marketing activities), your personal data is kept until your consent is revoked. You can exercise this right at any time. Revoking your consent does not affect the processing, lawful based on your consent during the period prior to its revocation.

H. RIGHTS OF DATA SUBJECT

The Data Subject has the following rights:

1. Right to access:

You have the right to access to information about your personal data and to verify the time and the way that the Data Controller keeps your Data. Furthermore, you have the right to access to information about the methods we use to process and protect your Data.

2. Right to rectification:

You have the right to correct, update or modify your personal data.

3. Right to erase (to be forgotten):

You have the right to submit a written request for the deletion of your personal data from the file of the Data Controller at any time. According to the circumstances, this right is subject to certain restrictions or does not apply, depending on each case.

4. Right to restriction of processing:

You have the right to request restriction on the processing of your personal data in the following cases: When,

- (a) you dispute the accuracy of your personal data and until it is verified,
- (b) you do not wish to delete your personal data but you wish to restrict their use,
- (c) your personal data is not used for processing purposes, but is necessary to establish, exercise and support legal claims, and
- (d) you object to the processing and until it is verified that there are lawful reasons which concern us and prevail over the reasons why you oppose the processing.

5. Right to object:

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you including profiling. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Where personal data are processed for direct marketing purposes, you have the right to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where the Data Subject objects to processing for direct marketing purposes, the Controller shall no longer processes to your data, for such purposes.

6. Right to data portability:

You have the right to receive, free of charge, a copy of your personal data in electronic or printed form, which will allow you to access verify and edit it using commonly used processing methods. You also have the right to request us, if technically feasible, to transfer your data directly to another Data Controller. This right can be exercised for the data you have provided to us and their processing is carried out by automated means, with your prior consent or in execution of a relevant contract.

7. Right to withdraw consent:

Finally, the Data Controller informs you that in cases where the processing of your personal data takes place after your prior consent, you have the right to revoke it freely, without prejudice to the lawfulness of the processing based on your consent before to be revoke.

To exercise any of your above rights you can contact the Data Protection Officer (DPO) in writing at the following email address: dpo@lasingnorahotel.gr, fax (+30)2671031157

8. Right to complain to the Data Protection Authority:

You have the right to file a complaint to the Personal Data Protection Authority (www.dpa.gr): Call Center: (+30) 210 6475600, Fax: (+30) 210 6475628, E-mail: contact@dpa.gr

I. POLICY AMENDMENT

The present Policy may be amended from time to time.

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