

LOUIS HOTELS GROUP - Privacy Notice

Effective as from 1st October 2019

Introduction

Louis Hotels Group and its subsidiary companies respect personal privacy and will process any personal information only for the purpose it is intended i.e. offering its services (hotel and restaurants). We value the relationships with all our customers, website visitors and stakeholders (Data Subjects). This notice explains how Louis Hotels Group collects, processes and manages your personal data. Louis Hotels will process all personal data in compliance with the General Data Protection Regulation (GDPR) and any applicable local privacy law. This is to provide you with a service you have requested and to meet our statutory obligations.

This Privacy Notice applies to Louis Hotels Public Company Limited (a public private company incorporated in Cyprus), its subsidiaries and all of the hotels or restaurants operated or branded under Louis Hotels (collectively, “we”, “our”, “us”, “Louis Hotels” or “Louis Hotels Group”).

This Privacy Notice broadly describes the practices Louis Hotels is applying for the provision of its services; but additional matters may, and some jurisdictions may place restrictions on Louis Hotels on processing activities (e.g. certain jurisdictions may require affirmative consent to send marketing messages).

This privacy notice ap to the hotels owned and manage by the Company. Please visit our website www.louishotels.com for more information.

Louis Hotels Public Company Limited (Cyprus) is the Louis Hotel entity that is the data controller for all guest at all Louis Hotels operated in Cyprus under the brand ‘Louis Hotels’, ‘King Jason’ and operates, among other things, Louis Hotels marketing activities, loyalty scheme “My LH Points@ and restaurants under brand ‘Elliniko Ouzomezedopolio’, ‘Akakiko’ and ‘Akakiko to GO’. Louis Hotels S.A. of Greece, which is a subsidiary of Louis Hotels Public Company Limited (Cyprus), is the processor of the data you provide when making a reservation at a Louis Hotels property or hotel operated in Greece under ‘Louis Hotels’ brand and is the sub- data controller for that information.

By using or agreeing to use or to be offered with any of Louis Hotels services (e.g. making a reservation or registering for an event or for newsletter service or using free Wi-Fi service) and you understand and acknowledge that we will collect and use personal information as described in this notice.

1. What personal data we collect

Louis Hotels collects personal data from you when you volunteer to provide such personal data, or when you interact with our services. Other personal data relating to you, may also be provided to us by other persons. This could include, a booking made for you by another person who may be a family member or travelling companion, a booking made by a booking agent or other intermediary working for you or by your employer or other third party on your behalf where you are travelling on business.

Personal data, or personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We collect the following types of personal data which we divided in groups:

Service Users/Guest/Clients:

- **Identity Data:** first name, maiden name, last name, username or similar identifier, title, date of birth and gender, signature, National ID or Passport information, Visa information, footage, business related information (your Company identity information and your relationship with them).
- **Contact Data:** billing address, email address, home address and telephone numbers, your Company contact data, and any other similar data
- **Reservation Data:** room number, type of room, number of guests, vehicle information, arrival and departure time, membership information, travel history.
- **Financial Data:** bank account and payment card details.
- **Transaction Data:** details about payments to and from you and other details of reservations or other offers you have purchased from us.
- **Sensitive Data*:** Any disabilities, medical conditions or allergies that could affect your stay in any of our hotels.
- **Technical Data:** We may collect internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website (for more detail read our **Cookies Notice**).
- **Profile Data:** your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data:** details about how you use our website, applications or other products or services
- **Marketing and Communications Data:** your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Use of our social media pages or other interactive forums:** any comments, photos (including events hosted at our Hotels for marketing purposes), videos or other information that you post online.
- **Our correspondence with you:** this includes any feedback, complaints and comments from you via telephone, email or social media, or records of any online, paper or in-person correspondence and interactions between us.
- **Minors:** We collect personal information from individuals under 18 years of age such as date of birth for pricing purposes.
- **Voluntary information:** other types of information that you voluntarily choose to provide to us.

We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data may be derived from your personal data but is not considered personal data by law, as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

*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 (i.e. the provision of disability access).

Recruitment:

Louis Hotels collects personal data from candidates for recruitment purposes. The information that we may collect and hold about candidates includes:

- Name, address, telephone number(s) and email address
- Details of qualifications, skills, experience and employment history
- Details of current immigration status
- Details of criminal or pending criminal convictions in Cyprus/Greece or any other jurisdiction
- Any additional information contained in a candidate's CV such as referee information disclosed at interview or otherwise provided to us during the recruitment process.

Louis Hotels needs to process data to decide whether to enter into a contract of employment with a particular candidate and may also process certain data to ensure that it is complying with its legal obligations. Louis Hotels has legitimate interest in processing personal data during the recruitment process and in keeping records of the process in order to manage the recruitment process. It is required to assess and confirm a candidate's suitability for employment and decide to whom to offer a particular role. We may also need to process candidate's data to respond to and defend itself against legal claims.

Louis Hotels will not share a candidate's data with third parties, unless his or her application for employment is successful and an offer of employment is made to him or her. Once an offer of employment has been made and accepted by a candidate, we may also contact the previous employers named by that candidate as referees for the purpose of obtaining employment references. Additionally, a criminal record might be requested. The candidate may also be required to provide medical information to Louis Hotels' occupational health provider for the purposes of assessing his or her capacity to work.

2. How we collect your personal data

We use different methods to collect data from and about you including:

Directly from you: you may give us your Identity Data, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, and/or email. You may also provide us with Personal Information during registration and check-in at our properties (for example, when you complete our hard copy registration form when you register with us in person).

From third parties on your behalf: we may receive your Identity Data for a reservation made under your name from your next of kin, from a travel agency, from the Company you work for.

Information provided from you about related persons: you may provide us with Personal Information about members of your family, friends, dependents, or other third parties for the

purposes of making a reservation. In these cases, it is your responsibility to inform them of their rights in connection with this Privacy Policy with respect to such information.

Automated technologies or interactions: as you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please read our Cookies Notice for more information.

Third parties or publicly available sources: we may receive personal data about you from various third parties such as travel agents, booking sites or your social media pages.

Reservations / bookings: we may receive your data from a reservation made by you or a third party on your behalf, via email, phone, fax and/or website, and/or booking platforms or engines (such as booking.com)

Check in and Registration: We may receive your data through the registration form completed by you upon check-in.

Competition, Vouchers, Promotions, Survey: we may receive your data if you choose to participate in any competitions.

Social Media: We may receive your data if you choose to contact us through our social media pages or by using connections to internet through our social media.

Loyalty Scheme Program: if you choose to become member of our loyalty scheme, we will collect your data in order to provide you with the benefits associated with the scheme.

Hosting Events (meetings, weddings etc.): We may collect your personal data through the host of an event, by you directly, in order to organise an event in one of our venues.

CCTV: we may record or capture images of you in public areas, by using CCTV, principally for the purpose of protecting you, our visitors, and other guests and our staff.

Hotel Wi-Fi service: When you use Wi-Fi services at our hotels, the personal data for access and authentication may be collected and used.

3. How we use your personal data

Reservations: We may use your data to perform a reservation in relation to one of our services, such as accommodation, spa treatments, restaurant reservations etc.

Payments: In order to perform a reservation or any other sort of purchase, your payment details are required.

Services: To be able to provide and subsequently charge for any hotel related services and to facilitate any special requests or assistance that you have requested.

To complete your purchase: In regard to the delivery of food at the address of your choice, we will need to collect your data.

To improve our services and products: During your stay we might ask for your feedback in relation to our services which it will be used later on for the further improvement of our services.

To handle incidents: We may collect data regarding an incident that took place at our premises. This data will be used for further improvement of our services and/or for it to be accessible to you in court if you choose to take legal actions against us.

Marketing: We may use your personal data to share an idea of what products or services we think you may want or need, or what may be of interest to you.

You may receive marketing communication from us if you have requested information from us, reserved a room with us, booked an event with us or if you have provided us with your details when you entered a competition or registered for promotional material and, in each case, you have not opted out of receiving marketing material.

We will get your express opt-in consent before we share your personal data with any company outside Louis Hotels group for marketing purposes.

You can ask us or third parties to stop sending you marketing material at any time by contacting us above or clicking on the opt-out link included in each marketing message.

Should you choose to opt out of receiving our marketing material, we will continue to carry out our other relevant activities using your personal data, for example this will not apply to personal data provided to us because of a room reservation or other services.

Loyalty membership: We will collect your data if you choose to become a member of our Loyalty scheme.

To comply with legal obligation: Your data might be used to comply with the requirements imposed by our auditors, financial reporting requirements, government authorities and to cooperate with law enforcement agencies, government authorities, regulators and/or the court.

Service Personalisation: we may use your data to personalise our services to match your personal needs.

4. Lawful Basis for processing

Performance of a contract with you: the processing is necessary either due to a contract we have with you, or because we have asked you to take specific steps before entering into a contract. For example, we process your data in order to fulfil your booking request.

Legal Obligation: In circumstances where it's our legal obligation to disclose or share your data in order to comply, with our regulatory obligations or contractual obligations, including for billing and collection purposes; or to protect the rights, property, or our safety, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Legitimate interest: The processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests. For example, it is our legitimate interest to advertise our services and provide details of any loyalty program or promotion. We will process your data to understand your preferences and requirements to provide our best services and products.

Before we process your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law), we make sure we consider and balance any potential impact on you and your rights before we process your personal data.

Vital Interest: In certain conditions when your consent it is not possible to be obtained, it may be necessary for us to process your Personal Data, including Sensitive Personal Data you provided through our Services, where it is in your vital interest or in the interest of others. Vital interest or in the interest of others could be an event of a medical emergency, in which we may disclose your data, for example, to a hospital.

Consent: in case where you have given a clear consent for us to process your personal data for a specific purpose. Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you, process information about your health, any disabilities and allergens that you, or someone on your behalf, volunteers to us to enable us to accommodate your needs during your stay.

You have the right to withdraw consent at any time by contacting us. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

5. Disclosure

Louis Hotels will not disclose your personal information without your prior consent however, depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed as follows:

To Hotels: The Personal Data you have provided for making a reservation is shared with the respective hotel for the execution of your request. The hotels managed by Louis Hotels might be owned by a third-party Owner, however, after your check-out, we retain your Personal Data as well as the details of your stay and your preferences in order to provide personalised service during your next stay.

To Affiliates: We are part of Louis Group and may share your Personal Data with other restaurants or hotels within our group, including our offices in Cyprus and Greece, in order to help accommodate your needs during your stay at our hotels and to provide you with marketing communications consistent with your choices. For marketing purposes, Louis Hotels may share contact data to affiliates as long as you express opt-in consent before the share of your personal data.

Commercial Service Providers and Suppliers: We may outsource the processing of certain functions and/or information to third parties that provide services. Some services (but not limited to) are outlined below:

Service
Online Payments
Online reservations
Hotel Management System
Information Technology
Email Marketing campaign
Website hosting
Online Chat

External Partners: We may share your Personal Data with other third party partners including consultants and advisors who provide services to us. Other third parties include credit card issuers, financial institutions, external auditors and lawyers.

Travel-Related Service Partners: We may share your Personal Data with travel related third parties. This may include travel agencies, airlines and car rentals in order to allow them to provide you with a single source for purchasing travel-related services. Please note that this Privacy Notice does not apply to information that you provide directly to third parties.

Business Transfers: If we cease to operate a hotel, the Owner may continue to have and use your Personal Data for continued business purposes consistent with the hotel's operations, including direct marketing.

Third-party links: This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

When we share your personal data with third parties, we make sure that they use the same level of protection we use and that they are complainants with GDPR.

6. How long we keep your information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, primarily for the purposes of satisfying any legal, accounting, or reporting requirements. After the expiration of this period, we will delete/ destroy in a way that such data cannot be retrieved.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use and/or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and also the applicable legal requirements.

In some circumstances you can ask us to delete your data. In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

7. Cross-Border Data Transfers

The Personal Data and other information that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It also may be processed by staff operating outside the EEA who work for us or other entities acting as data processors processing data on our behalf. This includes staff and providers engaged in, among other things, the fulfilment of your request or order and the provision of support services. More information on to whom your data is disclosed can be found in the “Disclosure” Section.

To comply with applicable data protection law, we have implemented international data transfer agreements based on EU Standard Contractual Clauses in order to provide appropriate and suitable safeguards for Personal Data transferred to countries outside the EEA where an adequate level of protection is not already guaranteed.

8. What are your rights?

In this Section, we have reiterated the rights that you have under data protection law (Your rights are not fully explained in this section). You should read the related legislation, published by the regulatory authorities for complete clarification of these rights.

Your rights under data protection law are:

- **the right to access;**
You have the right to receive a copy of the personal data Louis hotels holds on you as well as information about how it is used.
- **the right to rectification;**
You have the right to ask the organisation to correct personal data we hold on you where it is incorrect or incomplete.
- **the right to erasure;**
This right entitles you to require the erasure of your personal data from the organisation’s systems and records. However, this right applies only in certain circumstances (e.g. where the organisation no longer needs the personal data for the purpose for which we collected it or where you withdraw consent to our use of your personal data and where there is no other legal basis for continuing to use it).
- **the right to restrict processing;**
This right entitles you to restrict the processing of your personal data by us. Where this right is exercised, the organisation is still permitted to store your personal data, but other use of the data is prohibited, save in certain limited circumstances.
- **the right to object to processing;**
You have the right to object to our use of your personal data in certain circumstances. However, the organisation may continue to use your personal data, despite your objection, where there

are compelling legitimate grounds to do so or we need to use your personal data in connection with any legal claims.

- **the right to data portability;**

This right allows you to obtain your personal data in a format that enables you to transfer that personal data to another organisation where the organisation is processing your personal data on the basis of consent or on the fulfilment of a contract and if processing is carried out by automated means. You may have the right to have your personal data transferred by us directly to the other organisation, if this is technically feasible.

- **the right to complain to a supervisory authority;**

You have the right to lodge a complaint with the [Data Protection Commissioner](#) if you think that the organisation has not processed your personal data in accordance with data protection legislation and,

- **the right to withdraw consent;**

You have the right to withdraw your consent to the processing of your personal data by us at any time. This will not affect the lawfulness of our processing before the withdrawal.

If you wish to exercise any of the rights set out above, please contact us through our DPO Office via email at dpo@louishotels.com so we provide you with the necessary information.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you believe that our processing of your personal information trespasses data protection laws, you have a legal right to report a complaint with a supervisory authority accountable for data protection as state above.

9. Failure to provide personal information

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. For example, in order to reserve a room for you we will need to process your personal data. In case you fail to provide the required data, we may have to cancel a booking you have with us, but we will notify you if this is the case at the time.

10. Modifications of this policy

We may revise this policy occasionally by publishing a new version on our website. You may choose to check this page on a regular basis to note any changes to this notice.

We might inform you of significant changes to this policy by email or through a private messaging system on our website.

11. Contact us:

If you have any question about this Privacy Notice or our data protection practices, please contact us by writing to our Data Protection Officer.

Our Data Protection Officer's contact details are:

E-mail: dpo@louishotels.com

Tel. : +35722588007

Address: Achaion 1, 2413 Engomi, Nicosia, Cyprus