

AEOLOS BEACH HOTEL	PriPol v.04(en)
Privacy Policy	11.05.2020

1. Introduction

At AEOLOS BEACH HOTEL (the Hotel) we stress the importance of privacy and are committed to adopting high standards for the protection of personal information. This policy outlines the way we collect, receive, and process your personal data (PD) when you contact us or use one of our services.

Moreover, this Privacy Policy aims to inform you (the natural person) about the type of PD we collect, why we collect it, on what legal basis it's been collected and processed, the policies and procedures we have established for its collection, procession, use, storage and for sharing certain types of personal data in certain limited circumstances. In addition, our Privacy Policy outlines the procedures you should follow if you have any questions or requests in respect of your personal information or our policies and procedures, or if you wish to update, manage, export or delete your personal information, as well as all the contact details of the person in charge of such requests (Data Protection Officer), as listed in §15.

Furthermore, this Privacy Policy declares our compliance with legislation - and specifically with the EU General Data Protection Regulation 679/2016, as well as with the Greek National Law 4624/2019 - and also our respect for the protection of privacy and security of personal data. This Privacy Notice applies to personal data provided to or collected by us (as the data controller) in connection with the services we offer.

This Privacy Policy was posted on our website on 13/05/2020 and replaces any earlier post.

This Privacy Policy generally is addressed to any natural person who has made or intends to make use of our services as a customer.

2. Who we are

Aeolos Beach Hotel and its staff, welcome you. Enjoy the pleasures of a hotel property situated beside the beach. The ideal place to spend your holidays with family or friends, with activities, entertainment and festive evenings organised during your stay. The attentive service of our exceptional team ensures your every need is been catered for.

Our Vision & Mission

To be recognizable by service and product quality standard; and to be consistent in promotion of excellence, novelties and future development. We are unwaveringly committed to providing and delivering outstanding services and experiences to new and returning guests by exceeding their expectations of what we can offer, by recognizing and acknowledging our employees' contribution and involvement.

Our Values

Among the standards, morals, ethics, ideals, and tenets of beliefs that we strive to encourage, uphold and sustain with our managerial and service staff, is for us to be relevantly creative but eco-minded, to build lasting rapport and relationships. In addition, we strive to be approachable by being always truthful and sincere, to have dedicated passion for our work and duties, to co-exist as a team and to respect others irrespective of age, race and/or religion, to have courage to embrace change, and to deliver exceptional and exemplary service 24/7 to everyone who walks through our doors.

3. What PD we process

Personal data (PD) means any information that can be used to identify directly or indirectly a specific individual (you as a natural person).

We have to process PD (ie to collect, manage, store, delete) for the effective execution of our everyday business functions and services and, in some occasions, for the compliance with relevant legislation and regulations.

You (as a natural person) are not obliged to provide us the personal data that we request, but if you choose not to do so, we may not be able to provide you with specific services, or with a high quality services or respond to any queries you may have.

When making a future reservation (over the phone, by using our website, or at our premises) or using the Hotel services it is necessary for us (the Hotel) to have information (that is not otherwise publicly available and is not part of your work identification) in order to identify you, contact you and process your purchase and requests. This information, depending on the type of transaction, usually includes your name, address, phone number, e-mail address, time of booking, personal identification document with date of birth upon check-in, IBAN, credit card number and expiration date, and language preference. It may also include, if you choose to share that information with us, your preferences regarding the delivery of your service such as flight number & time of arrival for provision of transfer services, type of room, type of bed, and the like. We also sometimes offer special discounts from time to time for which you may have qualifying criteria. Sometimes we make special offers to, for example, seniors or children. To assess your eligibility and process your reservation correctly, we need to record your date of birth at the time of booking. You may be required to provide personal identification with your date of birth upon check-in.

The Hotel may use the information you provide to send you offers and information about its services.

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4. Why we collect PD

1. To establish and maintain a responsible commercial relationship with you and to provide ongoing service.
2. To understand your needs and preferences. We maintain a record of the products and services you receive from us and we may ask for additional information so that we can serve you better. For example, we may record your preference for room type.
3. To develop, enhance market or provide products and services. For example, we look at our guests' use of our services so that we can better understand how to improve our services.
4. To manage and develop our business and operations. For example we analyze guest patterns of usage of our hotels and services to help us manage them efficiently and plan for future growth.
5. To meet legal and regulatory requirements.

5. How do we collect PD

We may collect personal data from a variety of sources. This includes:

- ✓ Personal data you give us directly by making a reservation, or by using Aeolos Beach Hotel services.
- ✓ Personal data we collect automatically by visiting our website, and/or booking engine.
- ✓ Personal data we collect from other sources (i.e. through communication regarding service delivery such as comment forms, or participation in a marketing initiative, strictly for Hotel use).

Most of the PD we process are provided to us directly by you, on a voluntary basis, for one of the following reasons:

- You are interested in our services.
- You have made a complaint, comment, or enquiry to us.
- Information you disclose when you contact us or visit our website.
- Information we receive from your usage of our services or our partners' services.
- We use various kinds of technologies for the collection and storage of the information, including the use of cookies (see §13).
- Our web server collects information (such as IP address, search engine,) used for activities such as calculating number of visitors at our website, identifying points of interest, checking communication effectiveness, etc. We do not process GPS-type data.
- You have made an information request, a complaint or enquiry to us.
- You have applied for a job or secondment with us.
- You are representing your organization.

We also receive personal information indirectly, in the following scenarios:

- We have seized personal information as part of market research or an investigation.
- From our partners or cooperating organizations.
- One of our employees' delivered your contact details.
- It is likely to use information from advertising networks, our customers or third parties, in order to let you know about special services that may interest you.
- Your personal information is publicly available.

When you contact us, we keep a record of our communication messages so as to resolve any issues that may arise. We do not allow any unauthorized entities, especially without your consent, to access your personal information.

In some cases, our partners (ie tour operators, travel agencies, booking engines) give us access to personal data of their customers, suppliers or third parties in the context of our cooperation (this data may concern natural persons).

In these cases, our Hotel acts as a "Processor" or "Joint-Controller" of personal data. Consequently, in these cases different provisions of GDPR 679/2016 apply which we comply with.

6. When do we disclose PD

We disclose personal information only in these limited circumstances:

1. We may disclose a guest's personal information to a person who, in the reasonable judgment of the Hotel, is seeking the information as an **agent** of the guest - for example, a travel agent who is booking a reservation on behalf of the guest.
2. Personal information will be shared with a **third party** involved in supplying the guest with the services they have purchased to the extent necessary to effect the supply and the processing of the transaction (i.e. *beauty, massage services* etc.).
3. Personal information may be shared with a **third party** retained by the Hotel to perform functions on its behalf such as reservations handling, data processing or storage, guest surveys or research.
4. Personal information may be shared with an **agent** retained by the Hotel to evaluate a **customer's credit worthiness** or in order to collect a customer's account.

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5. Personal information may be shared with a **public authority** or an agent of public authority if in the reasonable judgment of the Hotel it appears that there is an imminent danger to life or property which could be avoided or minimized by disclosure of the information, or which disclosure is compelled by a legal authority. Personal information may also be shared when it is reasonably necessary and in order to comply with laws, regulations, legal procedures or governmental demands.

6. Personal information may be shared with data processors, who are third parties, who provide elements of services for the Hotel. We have contracts in place, with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do so. They will not share your personal information with any organization apart from us. They will hold it securely and retain it for the period we instruct them.

Any such disclosure of a guest's personal information by the Hotel to a third party will be made only on a confidential basis conditioned upon the information being used only for the purpose for which it has been disclosed. Personal information is disclosed to companies, organizations and natural person only after your explicit consent has been acquired by the Hotel, notwithstanding par. 5 of the present section (legal compliance and governmental demands).

7. How we use PD

We process (i.e. collect, store, disclose, delete etc) your personal data (PD) only for specific and limited purposes. Moreover, we will only use your personal data, where we have a legal ground to do so, in order to:

- Process your request and satisfy your demand
- Provide you with personalized and updated services
- Contact you to ask for your opinion (your opinion may be posted on our website) or let you know about new services that may interest you
- Process your payment or prevent or detect potential frauds
- Respond to your questions or complaints
- Implement the framework of this Privacy Policy
- Develop and improve our services, communication methods and the functionality of our websites
- Provide personalized communication and targeted advertising. In cases where we use your personal information for direct marketing purposes, promotional communication for new services or other offers, that we believe may interest you, such as special discounts, special offers for children or seniors etc., you may exercise your rights (see §9 & §12) by informing us that you do not wish to receive such messages from us in the future (see §15).

8. How long we keep your Personal Data

We keep your personal data for only as long as we need to. It depends on what we are using it for, as set out in this Privacy Policy.

For example, we may need to use it to answer your queries, complaints, or comments about a service and - as a result - we may retain your personal data for a reasonable amount of time after the queries and complaints have been answered, and the service has been completed (eg a period necessary for possible claims to be answered, or as regards comments, a period necessary for them to be reviewed by the hotel management team and the personnel, for the purposes of recognizing employees for excellence of service delivery and for developing improvements in service delivery). We may also need to keep your personal data for accounting purposes (the retention period depends on tax authorities' legislation or financial audits regulations).

If we no longer need your data, we will permanently delete / destroy them.

In addition, your personal data maintenance/storage period depends on the lawfulness of processing (legal basis for the processing), such as:

- When the processing of PD is necessary for the purposes of the legitimate interests pursued by the Hotel, then processing of personal data will take place for as long as is necessary for the pursuit of the Hotel's intended purpose and for as long as it is required until the lapse of any relevant claim has expired.
- When PD is voluntarily provided by natural persons themselves, for example as part of the registration at check-in, we will retain your data (both in hard copy and in electronic form) for as long as we maintain a contractual relationship with you or for as long as it is necessary for compliance with our legal obligations or until your relevant consent has been withdrawn. In any case we shall retain your PD depending on our legal obligations or the lapse of possible legal claims.
- When you (the data subject) withdraw your consent to the processing of your personal data and we have no other legitimate reasons to continue its process, we will destroy/delete your personal data. However, when you unsubscribe (eg from marketing communications or webpage) we will maintain your email address to ensure that we do not send you any mail/form in the future.
- When processing is necessary for the performance of a contract to which you (the data subject) are a part or in order to take steps at your request prior to entering into a contract; then we will retain your data for as long as you maintain a contractual relationship with us or for as long as it is necessary for compliance with our legal obligations or for as long as it is required until the lapse of possible legal claims.

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9. Your Rights

Under data protection law, you have rights we need to make you aware of. The rights available to you (as our guest, user of our services, our website visitor etc) depend on our reason for processing your personal information (ie your rights should not be contrary to relevant legislation).

- *Your right to be informed:* You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This Privacy Policy is providing you with relevant information.
- *Your right to access and rectification:* You have the right to access, correct or update your personal data at any time.
- *Your right to PD portability:* You can receive personal data you have provided us with, in a structured, machine-readable and interoperable format, and to transmit it to another controller. This right should apply where your personal data has been provided on the basis of your consent or in the framework for the performance of a contract.
- *Your right to erasure:* You have the right to ask us to erase your personal information in certain circumstances. The exercise of your right can always be done in accordance with legal requirements (eg you cannot ask for a deletion of your PD when the labor law or tax authorities require it to be retained for 7 years).
- *Your right to restriction of processing:* You have the right to ask us to restrict the processing of your information in certain circumstances, including processing for direct marketing.
- *Your right to submit a complaint* to the Hellenic Data Protection Authority, <http://www.dpa.gr/> or any national Data Protection Authority about how we process your personal data.
- *Your right to withdraw consent:* If you have given your consent to anything we do with your PD, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your valid consent up to that date is unlawful). You can withdraw your consent to the processing of your PD at any time by contacting us, through "Contact Us" (see § 15).

To exercise your rights, see § 12.

Further information and advice about your rights can be obtained from the Hellenic Data Protection Authority, <http://www.dpa.gr/> or any national Data Protection Authority in your country.

10. General Principles on PD Protection

1. The Hotel will not collect, use or disclose your personal information for any other purpose than those identified above, except with your consent.
2. The Hotel will protect your personal information with appropriate security safeguards.
3. The Hotel will take appropriate steps to protect the confidentiality of your personal information when dealing with third parties.
4. The Hotel will strive to keep your personal information as accurate and up to date as is necessary for the purposes identified above.
5. The Hotel will honor your request to access your personal information within the deadlines imposed by Law.

You are always free to refuse to provide personal information to us.

You may also withdraw your consent with respect to the use of your personal information for marketing purposes at any time, subject to legal or contractual restrictions and reasonable notice, by e-mailing our appointed DPO (Data Protection Officer) using 'Unsubscribe' as the subject line, and providing us sufficient personal identifiers so we can act effectively on your request.

However, in either case, this may limit our ability to serve you. If you have questions or concerns about our privacy practices or wish to make a request in respect of your personal information, please contact our Data Protection Officer at dpo@aeolosbeach.com.

11. Our Obligations

We (the Hotel) are responsible for accountability; in respect with the principles of processing personal data (ie legitimacy, objectivity and transparency, purpose limitation, minimization of PD, accuracy of PD, limitation of storage period, security, integrity, and confidentiality).

We will only use (process) your personal data where we have a legal ground to do so. We determine the legal grounds based on the purposes for which we have collected and used your personal data. In every case, the legal ground will be one of the following:

- **Your Consent:** For example, where you have provided your consent to receive offers or marketing emails from us. You can withdraw your consent at any time by submitting an email to "Contact Us" (§15 of Privacy Policy).
- **Performance of a contract with you (or in order to take steps prior to entering into a contract with you):** For example, where you have purchased a service from us and we need to use your contact details and payment information in order to process your order and deliver your service or to contact customer satisfaction survey.
- **Compliance with legislation:** In some cases, we may have legal obligation to process / retain your personal data, (eg compliance with legislation relevant to tax authorities or financial investigation units).
- **Our legitimate interests:** if processing is necessary for the purposes of our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms. This is the case when it is necessary to understand our customer, promote our services or operate our sites and apps efficiently. For example, we will rely on our legitimate interest when we study what content has been viewed on our sites and apps, so that we can understand how they are used. It is also in our legitimate interest to carry out marketing analysis to determine what services may be relevant to the interests of our customers and potential customers.

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In addition, we implement the appropriate technical and organizational measures to protect us and our partners against unauthorized access or alteration, tampering or destruction of PD we have in our possession.

Specifically:

- We control data collection, storage and processing practices, including security measures, to protect against non authorized access to systems and processes.
- Access to personal information is limited & controlled, and subject to strict contractual obligations of confidentiality.
- In case that our partners (third parties for maintenance or support purposes) have potential access to PD, certain appendices of the existing cooperation contracts cover the requirements of the Data Protection Regulation.

Throughout the entire processing cycle of PD (from collection to destruction), we take the appropriate technical and organizational measures to ensure the confidentiality, integrity and availability of PD. Similar measures are required by third parties who handle or process PD on our behalf.

Although our services are aimed to children under the age of 15, we do not knowingly process children's personal data. During check-in relevant consent is given by the holder of parental responsibility over the child. Guests must be at least 18 years of age to check in our Hotel.

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to secure your personal data once with us, we cannot guarantee the security of any personal data sent to our site while still in transit and so you provide it at your own risk.

12. Access to your own information

Within the scope of the rights granted to you by the Data Protection Regulation, you can view and request a correction or limitation of processing or deleting your PD (see in detail your rights in § 9).

You can exercise your rights by sending an email to "Contact Us" (§ 15) asking for a Subject Access Request (SAR) form, and submitting the properly filled SAR form through the "Contact Us". We are obliged to respond to you within one month of the receipt of your SAR.

13. Use of Cookies

We use "cookies" on our website. Cookies are pieces of information that an Internet site transfers to your hard drive for record-keeping purposes. The use of cookies is an industry standard -- you'll find them almost everywhere on the Internet. The Hotel and our booking engine use cookies to recognize visitors when they return to our sites. Once we know it's you, we can customize your online visit.

We may also evaluate our content and services and tailor our websites, for visitors, based on other information we collect, such as IP addresses, which are numbers assigned to your computer whenever you use the Internet, pixel tags (or clear gifs), and the type of Internet browser or operating system you are using. This information is collected in the aggregate, but we may tie it to your personal information through cookie use as described above.

You may refer to our booking engine's Privacy Policy for detailed information regarding the Cookies used by the booking engine.

We (the Hotel) ask you to accept cookies for performance purposes, social networking, and advertising. Some of these cookies are essential, while others help us to improve your experience by providing insights into how the site is being used. The information collected through cookies by means of contact forms will only be used for particular communication and will not be used for any other purpose. For more information check our "Cookies Policy" in the footer of the website.

If you do not wish to have data relating to your visits to our website collected through the third parties mentioned below (§14), you may opt-out by visiting the third parties opt-out pages.

Even after your initial settings selection, you can change your cookie settings for our website at any time. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org.

14. Links to other websites

We (the Hotel) do not control any third party website and therefore we cannot be held responsible for the content of any linked website or any link contained therein. Where we provide links to websites of other organizations, it's only for your own convenience and by no means does the inclusion in our website of any link imply endorsement, investigation or verification by the Hotel of the linked website or any information contained therein. As this Privacy Policy does not cover how linked third parties or organizations process personal information, we encourage you to carefully read the privacy notices on the linked websites you decide to visit.

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15. Contact Us

There are many ways you can contact us, including by phone, email, web and post:

AEOLOS BEACH HOTEL
FAO: The Data Protection Officer
Lampi 85300, Kos, Greece
email: dpo@aeolosbeach.com
tel: +30 22420 26781
web: www.aeolosbeach.com