

# Privacy policy of the Hotel Eden au Lac AG

## OUR AIMS

The Hotel Eden au Lac AG takes very seriously the security of your personal data and information that can be used to identify you. The Hotel Eden au Lac AG aims to continually exceed the expectations of our guests about the products and services we offer to business travelers and holidaymakers. We do everything we can to make our guests feel comfortable. That includes the responsible handling of the data you entrust to us. We undertake to protect your data in accordance with current data protection laws in force throughout the world.

In this Data Protection Statement, we describe how we collect data and how the use of this data can make things easier for you when you visit our website. In addition we set out who we might share your data with and why, and what options you have regarding the use of your data. We also describe the measures we have put in place to protect your data and the ways in which you can contact us with any queries you may have about our Data Protection Policy.

- WHY WE COLLECT DATA
- WHAT DATA WE COLLECT
- CONSENT
- DATA TRANSFER
- CROSS-BORDER DATA TRANSFER
- DELETING AND RETAINING YOUR PERSONAL DATA
- RETRIEVING, UPDATING AND REMOVING YOUR PERSONAL DATA
- SECURITY MEASURES
- ONLINE TECHNOLOGY
- LINKS TO OTHER WEBSITES
- MINORS
- CONTACT
- UPDATING THE DATA PROTECTION STATEMENT

This Data Protection Statement applies to all hotels managed or licensed by the Hotel Eden au Lac AG.

## 1. WHY WE COLLECT DATA

It is important to us that you are informed about how we collect and use personal data that we obtain from you via our websites or through your use of our products and services. In general, we only ask for information when we need it. The main reason for collecting your personal data is to enable us to provide the services that you have requested, such as the processing of a transaction. In addition, data may be collected for the following purposes:

- To fulfill reservation or information requests,
- To sell products or services,
- Registration of program memberships,
- In response to correspondence from us (e.g. surveys, promotional offers or reservation confirmations),

- To consider your personal preferences,
- Fulfilling requests for our services or recommendations,
- Collaborating with third parties, with your consent, including the processing of data that you place on social media or on other websites so that we are informed about your interests and can offer you a better service,
- Your use of our apps on electronic devices,
- Updating your contact details, including your address,
- Email forwarding of recommendations to friends, if you so wish.

We may also ask for your permission to use your personal data for the following purposes:

- To send you direct marketing news and communications regarding products and services offered by the Hotel Eden au Lac AG, by our distribution and marketing partners or other trusted third party providers.
- To conduct market research in the form of surveys so that we can meet your requirements more effectively, to improve the efficiency of our websites to make your hotel stay even more comfortable and to be able to be more targeted in the way we conduct advertising campaigns and other promotional activities.
- We may also analyze personal data that we have processed for the above purposes, in order to better understand our customers' requirements and to improve our services and how we operate. Such analysis results in aggregated data that is not used to identify or single out an individual, nor to take any action in connection with this individual, but is only used to analyze trends and other behavior patterns at an aggregated level.

## 2. WHAT DATA WE COLLECT

We collect information about our hotel guests and visitors to our websites, so that we can offer an experience that exactly meets their requirements. To be able to achieve this, we may collect personal data or other information from you that can be used to identify you, directly or indirectly. This data includes your name, private and business addresses, email addresses, telephone, mobile and fax numbers, credit card data, date of birth, gender and lifestyle information such as preferred room, leisure activities, name and ages of children, and other information we need to meet specific requests (e.g. a health condition requiring specific accommodation).

When you visit our websites, we may also collect internet protocol information and details of user behavior patterns, which we process only in ways that you (or anyone else) cannot be identified from it. When we use your data in this way, we are not seeking to identify you or single out information on an individual level. If we do wish to identify you or single you out, we make this clear when we collect the data and explain what we intend to do with this information.

## 3. CONSENT

You may unsubscribe at any time from the Hotel Eden au Lac AG surveys and marketing emails about the Hotel Eden au Lac AG offers and services, when we collect your data, by clicking on the link contained in these emails, or by contacting us direct and informing us that you do not wish to receive direct marketing or telemarketing communications, emails, or surveys from us. You always have the option of not making personal

data available to our strategic marketing partners and other trusted third parties for marketing purposes and to decide which communications you would like to receive from them and us.

In a few instances, your consent will be assumed due to the requested service or transaction concluded. For example, we may collect and use personal data that you have voluntarily provided, data on your behavior or other collected, aggregated information. In addition, it will be assumed that you consent to receive communications from us that are necessary to complete transactions and services requested by you.

In certain circumstances we will specifically ask you for your authority, if we collect information that is deemed to be confidential under particular data protection regulations (e.g. information on ethnic origin, political persuasion, religious or philosophical beliefs, trade union membership, sexual orientation, state of health or legal data), if this is permitted or required under the current laws.

#### 4. DATA TRANSFER

In most cases, data collected from you is stored on a local or global database by the Hotel Eden au Lac AG. In the course of processing your information, it may be necessary to forward your personal data to the subsidiary companies of the Hotel Eden au Lac AG, to hotels within the Hotel Eden au Lac AG Group and the third party providers within Switzerland and throughout the world, for the purposes described in this Data Protection Statement. The subsidiary companies and partners of and the hotel owners within the Eden au Lac AG who may have access to your data are subject to the same Data Protection Policy as regards your personal data, insofar as this is not precluded by law or otherwise required on legal grounds and/or by legal proceedings. As a matter of principle, we will not sell, hire or transfer your personal data to unconnected third parties outside the Hotel Eden au Lac AG system.

There is the possibility that we will disclose your data to third parties in the following situations:

- When we have had your agreement to do so.
- When companies or service providers operating in the name of the Hotel Eden au Lac AG need such data to be able to carry out their specific duties in accordance with their agreements with the Hotel Eden au Lac AG (e.g. credit card processing, customer care services, market research management or database management services),
- When a facility within the Hotel Eden au Lac AG system leaves and access to your personal data is necessary to complete business transactions, or to comply with contractual obligations relating to the fulfillment of reservations that have been made for future stays or events, in the event that the Hotel Eden au Lac AG merges with another company or is taken over by another company,
- In order to comply with legal or statutory obligations or the provisions of current law, a court order or a summons,
- In cases of emergency in which the life, health or property of an individual has to be protected.

If your data has been disclosed in any of the above situations, we will endeavor to limit the disclosure of data to the minimum required in the particular circumstance.

Insofar as legal provisions allow, third parties are under an obligation to protect your personal data in accordance with our Policy as well as the data protection legislation in force at the time.

## 5. CROSS-BORDER DATA TRANSFER

To achieve a consistently excellent service, we have built up a global network of subsidiaries, data-processing centers, trusted strategic marketing partners, service providers, customer service centers and skilled personnel throughout the world. Because of the type of business we are and do, we are required to pass on your personal data to other groups of companies, subsidiaries, locations, data-processing centers or service providers that might not be based in your home country. It is possible that we will transmit your personal data to countries other than from which the data was originally collected.

Even if the data protection laws and other legislation in these other countries are not as strict or as comprehensive as those in your homeland, the Eden au Lac AG will take appropriate measures to ensure the protection of your personal data in accordance with this Data Protection Statement.

Below is the contact information you need to change your communication preferences, to be removed from our marketing list or to raise general or specific inquiries with us.

[info@lareserve-zurich.com](mailto:info@lareserve-zurich.com)

If you reside in the European Economic Area or in Switzerland, we comply with the current legal provisions and see to it that there is adequate protection for your personal data when it is transmitted to countries outside the EEA or Switzerland. To meet our demands on a world-wide basis, we have signed up to Binding Corporate Rules: the Hotel Eden au Lac AG Guest Data Protection Standards. The Hotel Eden au Lac AG Guest Data Protection Standards are approved by the European Data Protection Authorities and are universally applied by all the members of the Hotel Eden au Lac AG Group that are subject to it.

## 6. DELETING AND RETAINING YOUR PERSONAL DATA

Your personal data is stored in such a way that you can only be identified for as long as is necessary for the purposes for which we collect and use your data. Your personal data can remain stored in particular files for some time as required by current legislation and the Hotel Eden au Lac AG Data Protection Policy to fulfill the financial or legal obligations necessary for the resolution of disputes or problems. In addition, some types of information may be stored indefinitely due to technical constraints but will be inaccessible for processing for purposes other than those required by law.

## 7. RETRIEVING, UPDATING AND REMOVING YOUR PERSONAL DATA

You can apply to have access to your personal data that we are storing, or to update, delete or lock your personal data, if this does not prove to be impossible or prohibitively expensive. You can ask us to confirm whether we are processing your personal data and where this data comes from.

Insofar as permitted by current laws, you may instruct us to delete your personal data in the following circumstances:

- Your personal data is no longer necessary for the purposes for which that data was collected or otherwise processed,
- If your personal data was processed on the basis of your consent and you have withdrawn that consent, your consent has become invalid or there are no longer any legal grounds for processing it,
- If the data processing was made as a result direct marketing purposes or you raise a justifiable objection,
- A court or regulatory body has ordered that the personal data concerned must be deleted or your personal data has been processed unlawfully.

To ensure that your personal data is correct and up to date, we request that you regularly check your data and update it where appropriate (e.g. If you have changed your address or email address, or you wish to add an alternative means by which we can communicate with you).

For the above reasons, therefore, you should not assume that your request will lead to all your personal data being completely removed from our database, although we will regularly check our data storage methods to ensure that personal data is not being actively processed and is only retrieved when legally necessary during the time that it is stored on the systems of the Hotel Eden au Lac AG and strategic partners of the Hotel Eden au Lac AG and service providers.

Below you will find the contact information you need to change your preferred means of communication, to remove yourself from our marketing list or to raise general questions and inquiries with us.

## 8. SECURITY MEASURES

The Hotel Eden au Lac AG is well aware of the importance of data security and is continually working to review and improve our technical, physical and logical security rules and procedures. Security measures have been implemented across all websites and servers operated by the Hotel Eden au Lac AG to protect your personal data from accidental loss, misuse and alteration while it is under our control. Although “total security” on the internet and offline cannot be guaranteed, we use particular procedures and technical measures to protect your data. These include the use of password protection, firewalls and encryption up to 256 bits. These are based on a digital certificate class 3 from the company VeriSign, Inc. This has allowed the application of Secure Sockets Layer (SSL), an encryption method that protects your data from interceptors and hackers during transmission.

## 9. ONLINE TECHNOLOGIES

When you visit our website, we and our external marketing partners may use cookies, invisible pixels and web beacons to gather information about you. A cookie is a small text file that is sent from a web server to your browser and is stored on your computer’s hard drive. This assigns a unique ID number to your computer, allowing you to be identified when you next visit one of the Hotel Eden au Lac AG website.

Cookies save time, as they mean we can send you relevant information without you having to state your preferences every time you visit our websites. The Hotel Eden au Lac AG cookies are not designed to harm your data, nor can they access data from other files on your computer's hard drive.

Furthermore, we can use cookies to offer you a personal experience in the following ways:

- Saving your user name and password for future visits, so that logging on can become quicker and easier.
- Ensuring that you are shown relevant borders and content.
- Ensuring that you receive all requested information.
- Helping us to prepare communications that are relevant to you and your interests and that match your location.

The Hotel Eden au Lac AG cookies are limited solely to our websites and services. They become ineffective when you leave the Hotel Eden au Lac AG websites and surf elsewhere on the internet. We log your use of our website so that we are better equipped to meet your requirements and to make it easier for you in the future to find the information you are looking for. Please note that various third party providers may set cookies on your computer's hard drive in addition to those set by the Hotel Eden au Lac AG.

The Hotel Eden au Lac AG is not responsible for such cookies from third party providers, nor for the technical capabilities or procedures used in connection with cookies from third party providers.

If you do not wish to partake of the benefits of cookies, you can tailor your internet browser accordingly. Depending on the type of browser you use, you may apply the following settings:

- You are asked individually to accept or decline cookies.
- You may also be able to prevent your browser from accept cookies altogether.

Your web browser retailer or manufacturer will have detailed information about cookie security. You should note, however, that many operations on our websites are not possible if you decline cookies, nor will your browser be recognized when you next visit our website.

Furthermore, the Hotel Eden au Lac AG uses invisible pixels, sometimes also known as web beacons, to count how many people log onto certain websites. Information retrieved from invisible pixels is collated as a whole and contains no personal data. The Hotel Eden au Lac AG uses this data to improve our marketing programs and web content.

We also work with providers and strategic marketing partners to provide offers and personalized content that might be of interest to you. These providers and other partners include advertising companies, advertising agencies, advertising networks, providers for particular user groups, data exchange agents, analysts and other providers. Our partners and providers use cookies and web beacons to collect information about your online activity (e.g. the website and pages you have viewed on the Hotel Eden au Lac AG website or on third party websites) and use it to help the Hotel Eden au Lac AG (and sometimes third party providers in the advertising sector) provide personalized content and advertisements when you are surfing the website of the Hotel Eden au Lac AG or other websites.

It is possible that we engage one of these providers to make our advertisement available to consumers whose online activity indicates that they are interested in travel. In other instances, we enter into an agreement with

specific advertising providers, if we believe that our website visitors might be interested in what they offer. We permit these advertising providers to offer co-branding advertising (e.g. the Hotel Eden au Lac AG and the provider) to customers who were on our site. Co-branding advertising can appear on the Hotel Eden au Lac AG websites or on third party websites.

## 10. LINKS TO OTHER WEBSITES

So that we can offer you a service that better meets your aspirations, our website contains links to other websites and third party providers for your information. We are not responsible for the collection, use, care, sharing or disclosure of data (including personal data) by such third parties. If you have any questions, please refer to the data protection policy and security measures of these third parties before you disclose any personal information. We recommend that you check the data protection statements and policies of linked websites to establish how data is collected, used and stored on these websites.

## 11. MINORS

We do not want to collect any personal data of minors; however, we are not always able to verify the age of anyone logging onto and using our websites. Whenever an underage person (as defined by the laws currently in force) gives us their data without the agreement of their parents or legal guardians, we request that the parents or legal guardians contact us so that this data can be deleted and the underage person receives no more advertising material in the future from the Hotel Eden au Lac AG.

## 12. CONTACT

If you would like to update your details or your preferred communication method, or if you would prefer not to receive any more marketing communications from the Hotel Eden au Lac AG, please contact us.

By email:

[dataprotection@aevis.com](mailto:dataprotection@aevis.com)

## 13. UPDATING THE DATA PROTECTION STATEMENT

This Statement was last updated to incorporate the adoption of the Binding Corporate Rules by the Hotel Eden au Lac AG into the Hotel Eden au Lac AG Guest Data Protection Standards. In order to meet the requirements of changes in the law, changing business needs or the demands of our guests, hotels, strategic marketing partners and service providers, the Hotel Eden au Lac AG Data Protection Statement will be updated from time to time.