

PRIVACY POLICY

Introduction

We would like to assure you that we respect your right to privacy, and we process your personal information with care. This privacy policy describes how we collect, use, share, store or otherwise process the information we hold about you. We are committed to ensuring your privacy.

The Data Controller of your personal data is LANDA S.A. at 100, Iraklidon Avenue, Ixia, Rhodes 85101, tax ID 090027229, Tel. + 30 22410 89900, E-mail info@rhodesbay.com

In our everyday activities we process data concerning individuals, mainly:

- Hotel guests and visitors
- Website visitors
- Vendors, suppliers and Partners
- Persons making use of the free Internet Access Service (WiFi service).

The hotel complies with the General Data Protection Regulation (2016/679 E.U. GDPR) and all other European and national legislation (i.e. Law 4624/2019) concerning the protection of personal data, electronic communications etc. and commits to safeguard your data at any time:

- The data is collected for specific, explicit and lawful purposes and is not further processed in a way incompatible with our purposes.
- We collect the necessary, for all purposes of processing, personal data and process it lawfully, fairly and transparently in relation to the data subjects.
- We ensure that your data are as accurate and up to date as possible and we retain them only for the time necessary for the purposes for which they are collected.
- In all cases, the criterion we use to determine their storage period is based on and takes due account of the need to comply with any relevant legal requirement and the principle of data minimization.

We process the data electronically and manually and take all appropriate measures to protect personal data against unauthorized or unlawful processing as well as against accidental loss, destruction or damage, using appropriate technical and organizational measures.

Purpose, legal basis of processing and retention time of your data

1. Data we collect automatically through our website

The www.rhodesbay.com & www.elitesuitesrhodes.com websites uses the SSL (Secure Sockets Layer) Protocol which encrypts the data exchanged between two devices (most commonly electronic Computers) by establishing a secure connection between them via the Internet, which results in the protection of your personal data.

When you visit our websites, our server collects the so-called log files, namely:

- Internet protocol address when you sign into the site. The IP address is personal data along with the date and time of your visit, although we cannot only track you with this data.
- Date and time of entry to the site.
- The volume of data sent in bytes.
- The browser and operating system you used to sign-in.
- Other information about websites you've visited and information you've searched for.

The legal basis for which we collect your data and retain it in special files (log files) is our legitimate interest in ensuring the security of networks, information and services from accidental events or illegal and malicious actions that may affect the availability, authenticity, integrity and confidentiality of stored or transmitted data (e.g. control of DDoS attacks " Denial of service"), as well as our legal obligation to provide a more secure environment for the processing of your personal data. The data will not be transferred or used in any other way and will be deleted in approximately one week. However, we reserve the right to check the server logs if specific Indications of unauthorized use.

2. Guest & Customer data

When you make a booking reservation

You have many options to make a reservation at our hotel. Whether you choose to make a booking reservation yourself by calling us, E-mailing us or using the special booking form on our website or if you book through a travel agent (Online Travel Agent or other) we collect, store and use your full name, E-mail and/or telephone number, number of persons who will be staying with you, as well as your booking data. You may be required to give your Credit card details. Your data will be processed for the completion of the booking and the legal basis of the processing is the execution of a contract.

If you wish to register as a member during the online booking procedure, we will collect, depending on your preference, your Facebook name and profile picture, your Google account name or your E- your mail and the legal basis of processing is your consent .

During your stay at the hotel

Upon your arrival and during your stay at the Hotel we will collect and process your full name, residential address, passport or identity card details, Credit card details, VAT number as well as any special orders and requests, in order to provide you with our services. The legal basis for the processing is the execution of the contract as well as our compliance with our legal obligations (e.g. compliance with police provisions).

We keep your data for a minimum period of two years, except for the data we are obliged to retain for longer periods in compliance with our tax and other legal obligations.

Finally, we may store your email address and/or other contact information to contact you in our effort to improve our services (by sending customer satisfaction questionnaires) or to send you important and interesting updates and offers. The legal basis for the processing is our legitimate interest (and your alleged own) as well as your consent which you can revoke at any time.

Organizing an Event

Our Hotel undertakes the organization of various events (conferences, weddings, social events etc.)

- If you bring your own staff, we will collect their names and employment contract.
- If you choose to assign us to organize your wedding, we will collect all the necessary documents for the issuance of the relevant licenses such as name of the future brides, passport or identity copy, birth certificate, indemnity certificate, etc.

This data will be processed for the performance of the contract and for compliance with our legal obligations (names and contracts of employment of any of your employees) and we will delete them at the latest within two months of the completion/organisation of the Event.

3. Data we collect by email

In the context of communication between us by email, we collect your name, email address and any other information you provide to us. This data is stored and used exclusively to respond to your request. The legal basis for the processing of your personal data is your consent and the retention period is five years.

4. Data we collect through our pages in Social Media

We have a page on the Facebook platform titled [Rhodes Bay Hotel](#), as well as [Instagram](#), [Twitter](#) and [LinkedIn](#). You can contact us through our pages in order to receive more information about our services using the "Send Message" option. In order to respond to your relevant inquiries, we process your username in the social media; we also may have access to other information that is publicly available through your Profile. The sending of a message for the purpose of communicating with us implies your consent to the processing of your data.

We take all security measures (technical and organizational) to ensure the security of data processing through social media, such as the limitation of individuals who have access to account management. The Hotel is not responsible for the way or means that the social networking platforms process your data and we recommend you visit their own Privacy Policy.

5. Use of the hotel's Free WiFi service

Your connection to the Hotel's WiFi Service is free of charge and is made at your choice :

- Either by registering your Facebook or E-mail, which we will collect with your consent,
- or without registering any personal item, using a special code we may provide.

6. CCTV data

In our hotel we use closed circuit Television (CCTV) and security cameras in order to ensure the safety of persons and property. The legal basis for processing is the legitimate interests of our own as well as yours, for a safe stay. The cameras are positioned in places that fully respect your privacy and the Log data is automatically deleted after 15 days, unless there is a legal reason to maintain them for a longer period of time.

7. Vendor's data.

In order to perform the contract between us we collect the data that our suppliers provide, such as name, address, contact details, shipping details, Vat number, bank account numbers etc. The legal basis for the Processing of your data is the execution of a contract as well as our compliance with tax and other legal obligations. We maintain your data for up to twelve years from the last provision of services, or as long as required by the tax and any other relevant legislation.

8. CV Data

If you choose to submit your CV with us whether by mail, E-mail a LinkedIn or other platform link, you consent for LANDA S.A. to process your personal data for the sole purpose of the evaluation of the qualifications and skills regarding any position within the company for which you may be deemed suitable. The legal basis for the process is your consent and your CV data will be deleted after a two (2) year period unless you update them by submitting new or supplement data.

9. Minor's data

We process the personal data of minors that you accompany under the written and explicitly expressed consent of the persons who have parental responsibility of the minor. In any case, we make reasonable efforts to verify that the Consent is granted or approved by the person who actually has the parental responsibility of the child, i.e. Passport, ID and any other available item.

10. Legal claims.

In any case, we may process your strictly necessary data for the foundation, exercise, support and execution of our legal claims.

Who has access to your data. Data Transfers .

Your data is processed electronically and manually in accordance with the procedures and practices related to the above purposes and is only accessible by our authorized personnel that processes personal data for the performance of their duties and is bound by a confidentiality obligation.

Your data may be communicated to professionals who provide us with external professional services (such as accounting, auditing, consulting, legal Services) that will act as Data Processors who have been authorized to process personal data on our behalf, with the same restrictions and in accordance with the applicable law. The above recipients receive only the necessary data for the respective services that they provide us and process your data only for the purposes stated above and in accordance with the data protection laws.

At your request, and for your convenience, we may transfer your data to independent data controllers (e.g. car rental company, spa service provider, travel agencies and legal basis for processing is your co-counsel.

Other recipients of personal data:

Recipients of your data may also be as appropriate:

- Public authorities (police and municipal authorities, Aao)
- Judicial and prosecution authorities in the event of claim instituted claims or criminal offences
- Third parties who have a proven legitimate interest in the establishment, exercise or support of your legal claims and request that you be passed your personal data. In this case, we will inform you of the specific request to transfer your data in order to exercise your statutory rights.

In addition to the above, the data will not be disclosed to third parties, individuals or legal entities and will not be disseminated.

Our company does not transfer personal data outside the EU, and if necessary (for example, in order to use Cloud services) this will be done under the terms and conditions set out in articles 44 and Following GDPR, as with your consent, the implementation of standard contractual clauses approved by the European Commission or in countries considered safe by the European Commission.

Cookies and related technologies

Like most websites, we use cookies and similar technologies when you access and browse our website in order to make your visit as comfortable and effective as possible.

Cookies are small text files that are stored on the hard disk of the computer or other electronic device with which the user accesses the site. Cookies are unique to each Web browser (e.g. Google Chrome, Mozilla Firefox, Internet Explorer, Opera, etc.) and contain anonymized information relating to the websites you visit and the devices You are using.

Types of cookies we use:

A) technical and Functionality Cookies (required)

These cookies are responsible for basic functionality of our website and application. They are necessary for you to browse our website and to access the various sections of this site. The provision of the website's basic Web services is not possible without these cookies.

b) statistical Analysis and performance Cookies

These cookies collect information about how you use our website, such as the site from which your visit originated, the pages you visit most often, the browser you used, etc. We use them for the purpose of analyzing traffic and improving the performance of our website. They collect aggregated, anonymous statistical information that cannot lead to the visitor's identification.

About the Google Analytics service

We use the Google Analytics service to record traffic and improve our website. Google Analytics uses Cookies to store certain information, such as the length of the visit to the website, the browser used, the location from which the visit originated, as well as frequency of visits. In order to access this data, we allow Google Analytics to place cookies on the hard disk of the computer or any electronic device of the visitor. The Google Analytics service is owned [by Google Inc.](#) More information about your data processing policy by Google can be found [here](#), and for the use of cookies within the Analytics service, [here](#). Technical information about Google Analytics cookies is available [here](#).

You have the option to block your data collection through Google Analytics altogether by installing the add-on in your browser:

<https://tools.google.com/dlpage/gaoptout>

c) Commercial promotion/targeted advertising Cookies

We use cookies (usually third parties', such as Google) to display personalized advertisements tailored to your preferences. A unique ID identifies information such as your IP address, Your browser, which ad has already been viewed in your browser, and whether you've accessed a webpage through an ad or what geographic location your visit comes from. You have the option to reject the installation of these cookies, so that ads that you are shown are not personalized.

Cookie Management

You may decide to accept all or part of the cookies when you visit to our website. You may also set up your browser in a way that you are informed about the setting of cookies and decide to accept or block them. Each browser differs depending on how it manages cookie settings. This is described in the Help menu of each browser, which explains how to change your cookie settings. Follow the links below depending on the browser you are using:

[Internet Explorer](#)

[Firefox](#)

[Chrome](#)

[Safari](#)

[Opera](#)

Please note that you need to adjust the settings separately in each browser and on each device you use. We also inform you that any limitation of cookies will prevent you from fully using some of our services and will not allow us to improve and personalize your navigation on our website.

You can find more information about cookies on www.allaboutcookies.org and www.youronlinechoices.eu.

Alternatively, you may disable the use of third-party Cookies via the relevant [Network Advertising Initiative](#) service.

See [here](#) in detail the cookies we use.

Rights of the subjects

Rights of parents/guardians and other subjects:

You may contact us any time, by sending a written request to the mailing address LANDA S.A., 100, Irakleidon Ave., Ixia, Rhodes, P.C. 85101 Rhodes or the email address: info@rhodesbay.com to exercise your rights:

- Right of access and information, i.e. to inform you whether the personal data relating to you or your children are processed, to request copies of such data, where the data is located etc.,
- Right to rectification of inaccurate and incomplete data

- Right to erasure of data (only when permitted by law and when technically possible) and/or restriction of processing
- Right to object (e.g. to sending informative correspondence).
- The right to withdraw consent, which does not affect the lawfulness of the processing until the revocation.

Likewise, you can always report comments and submit complaints to the Greek Data Protection Authority, Kifisias 1-3, GR 115 23, Athens, call center: + 30-210 6475600, E-mail: complaints@pda.gr

October 2019
