

G.N.T.O. 1096509

# **Privacy Policy**

La Place Suites knows that you care how your personal data is used and we recognize the importance of protecting your privacy. This Privacy Statement explains how La Place Suites and all its subsidiaries collect and manage your personal data. It contains information on what data we collect, how we use it, why we need it and how it can benefit you. Contact us through <a href="mailto:privacy@laplacesuites.gr">privacy@laplacesuites.gr</a> if you have any queries and comments, or if you want to make a request regarding any of your data subject rights.

#### Basic principles and our privacy commitment

At La Place Suites we are committed to protecting your right to privacy. We aim to protect any personal data we hold, to manage your personal data in a responsible way and to be transparent in our practices. Your trust is important to us. We have therefore committed ourselves to the following basic principles:

- a) You have no obligation to provide any personal data requested by us. However, if you choose not to, we may not be able to provide you with some services or products;
- b) We only collect and process your data for the purposes set out in this Privacy Statement or for specific purposes that we share with you and/or that you have consented to;
- c) We aim to collect, process and use as little personal data as possible;
- d) When we do collect your personal data, we aim to keep it as accurate and up to date as possible.
- e) If the personal data we collect is no longer needed for any purposes and we are not required by law to retain it, we will do what we can to delete, destroy or permanently de-identify it.
- f) Your personal data will not be shared, sold, rented or disclosed other than as described in this Privacy Statement.

#### What personal data do we collect?

The personal data we collect varies depending upon the purpose of the collection and the product or service we are providing you.

Generally, we may collect the following types of personal data from you directly:

your name, your passport details (date of issue and expiry date, passport number, issuing authority), your date of birth, your identity card number, your nationality, your state of health (eg if you need a wheelchair etc.), your photo, your phone number, your email, your address, your profession, your credit card details (card number, issuing and expiry date, issuing bank, cvv), your signature or / and your sex.

## Why do we collect and use your personal data?

We collect your personal data so we can provide you with the best online experience and to provide you with a high quality of customer service. In particular we may collect, hold, use and disclose your personal data for the following purposes:

• To process your payments, if you purchase our products, to provide you with your order status, deal with your enquiries and requests, and assess and handle any complaints;

- To process and answer your inquiries or to contact you in order to answer your questions and/or requests;
- To develop and improve our products, services, communication methods and the functionality of our websites;
- To communicate information to you and to manage your registration and/or subscription to our newsletter or other communications;
- To manage our everyday business needs in connection with your participation in our contests, sweepstakes or promotional activities or request;
- To authenticate the identity of individuals contacting us by telephone, electronic means or otherwise;
- For internal training and quality assurance purposes;
- To understand and assess the interests, wants, and changing needs of customers, in order to improving our website, our current products and services, and/or developing new products and services;
- To provide personalized products and communications as well as product recommendations to you a customers;
- To carry out our contractual obligations towards you or a third party, based on a relative legal document or your request.

We may also need your personal data to comply with legal obligations or in the context of a contractual relationship that we have with you.

When we collect and use your personal data for purposes mentioned above or for other purposes, we will inform you before or at the time of collection.

Where appropriate, we will ask for your consent to process the personal data. Where you have given consent for processing activities, you have the right to withdraw your consent at any time.

## Your rights

Where we process your personal data, you are entitled to a number of rights and can exercise these rights at any point. We have provided an overview of these rights below together with what this entails for you. You can exercise your rights via our e-mail <a href="mailto:privacy@laplacesuites.gr">privacy@laplacesuites.gr</a>.

The right to access your personal data and correction

You have the right to access, correct or update your personal data at any time. We understand the importance of this and should you want to exercise your rights, please contact us via our e-mail <a href="mailto:privacy@laplacesuites.gr">privacy@laplacesuites.gr</a>.

## The right to data portability

Your personal data is portable. This means it can be moved, copied or transmitted electronically. However, this right only applies where:

- The processing is based on your consent;
- The processing takes place for the performance of a contract;
- The processing takes place by automated means;

If you wish to exercise your right to data portability, please contact us via our e-mail privacy@laplacesuites.gr.

## The right to deletion of your personal data

You have right to request that we delete your data if:

- your personal data is no longer necessary in relation to the purposes for which we collected it; or
- you withdraw the consent that you had previously given us to process your personal data, and there is no other legal ground to process that personal data; or
- you object to us processing your personal data for direct marketing purposes; or
- you object to us processing your personal data for our legitimate interests (such as improving overall user experience on websites);
- the personal data is not being processed lawfully; or
- your personal data needs to be deleted to comply with the law;
- your personal data was not collected in order to complete a contractual obligation of our company;
- you have not in any way made a written or oral complaint and / or a request with a legal context to our company;

If you wish to delete the personal data we hold about you, please let us know <a href="mailto:privacy@laplacesuites.gr">privacy@laplacesuites.gr</a> and we will take reasonable steps to respond to your request in accordance with legal requirements. If the personal data we collect is no longer needed for any purposes and we are not required by law to retain it, we will do what we can to delete, destroy or permanently de-identify it.

#### The right to restriction of processing

You have the right to restrict the processing of your personal data if

- you do not believe the personal data we have about you is accurate; or
- the personal data is not being processed lawfully, but instead of deleting the personal data, you would prefer us to restrict processing instead; or
- we no longer need your personal data for the purposes we collected it, but you require the data in order to establish, exercise or defend legal claims; or
- you have objected to the processing of your personal data and are awaiting verification on whether your interests related to that objection outweigh the legitimate grounds for processing your data.
- your personal data was not collected in order to complete a contractual obligation of our company;
- you have not in any way made a written or oral complaint and / or a request with a legal context to our company;

If you wish to restrict our processing of your personal data, please let us know <a href="mailto:privacy@laplacesuites.gr">privacy@laplacesuites.gr</a> and we will take reasonable steps to respond to your request in accordance with legal requirements.

## The right to object

You have the right to object to the processing of your personal data at any time. Please contact us via our e-mail <a href="mailto:privacy@laplacesuites.gr">privacy@laplacesuites.gr</a>.

The right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint directly with supervisory authority about how we process personal data.

## How we protect your personal data

We understand that the security of your personal data is important. We make our best efforts to protect your personal data from misuse, interference, loss, unauthorized access, modification or disclosure. We have implemented a number of security measures to help protect your personal data. For example, we implement access controls, use firewalls and secure servers, and we encrypt personal data.

## Sharing of your personal data

We will not share your personal data to any third party unless we have your consent or we are obliged by law or we are obliged in order complete any contractual obligations towards you.

As far as tourism transactions are concerned, due to the nature of those transactions, we are contractually obliged to transfer personal data to different electronic platforms and / or parties which then might be transferred to other platforms and / or parties outside the contractual and actual control of our company. In order to perform a requested booking, your personal data may be transferred to any number of third parties which we may not know and control. But we shall do our best to contractually protect your personal data in relation to the third party we send it to.

#### Automated decision-making and profiling

For some services and products we may process your personal data using automated means. Essentially this means that decisions are taken automatically without human intervention. We may also process your personal data for profiling purposes to predict your behavior on our website or products that may be of interest to you. If we intend to make use of such methods, we will of course inform you and we will give you an opportunity to object to these processes in advance. You are also free to contact us <a href="mailto:privacy@laplacesuites.gr">privacy@laplacesuites.gr</a> for further information on such processing.

## Cookies and other technologies

We may also collect personal data about you through the use of cookies and other technologies. This may occur when you visit our sites or third-party sites, view our online promotions, or use our/third-party mobile applications and may include the following information:

- Information about your device browser and operating system;
- The IP address of the device you are using;
- Web pages of ours that you view;
- Links that you click while interactive with our services.

#### How to contact us

If you have any questions, comments or complaints regarding this Privacy Statement or the processing of your personal data, please contact us via our e-mail <a href="mailto:privacy@laplacesuites.gr">privacy@laplacesuites.gr</a>.