



## EU GDPR 2018 | CORPORATE PRIVACY POLICY

Our brands **OCEANOS HOTELS GROUP GREECE** and **SIGMA HOSPITALITY & TOURISM GROUP GREECE** owned by **STAMATOGIANNAKIS GROUP OF COMPANIES**, comply with the new EU Information Handling Regulation known as GDPR and protects all information given to us. This Privacy Statement describes the privacy practices of our companies in connection with information that we collect through our website from which you are accessing this Privacy Statement, through our social media pages that we control from which you are accessing this Privacy Statement, through HTML-formatted email messages that we send to you that link to this Privacy Statement, and through your communications with us and when you stay as a guest at our hotel (collectively, including the Website and our Social Media Pages, the “**Online Services**,” and together with offline channels, the “**Services**”). By providing Personal and Other Information to us, you agree to the terms and conditions of this Privacy Statement.

### Collection of Personal Information

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable individual. We may collect Personal Information such as:

- Name, gender, home and work address, telephone number and email address, your business title, date and place of birth, nationality, passport, visa or other government-issued identification information;
- Guest stay information, date of arrival and departure, goods and services purchased, special requests made, information and observations about your service preferences (including room type, facilities, holiday preferences, amenities requested, ages of children or any other aspects of the Services used);
- Telephone numbers dialed, faxes sent/received or receipt of telephone messages when connected to the telephone services we may provide guests during their stay;
- Credit and debit card number;
- Employer or other relevant details if you are an employee of a corporate account, a vendor or other type of business partner (e.g., travel agent or meeting and event planner);
- Additional contact information about you that we may obtain through third parties with whom we do business (e.g. travel agents or similar providers);

If you submit any Personal Information relating to other people to us or to our service providers in connection with the Services (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Statement.

We and our service providers may collect Personal Information in a variety of ways, including:

- **Through Our Online Services:** We may collect Personal Information when you make a reservation or otherwise purchase goods and services from us, communicate with us via online services, inform us of any special requests or preferences you may have, or sign up for a newsletter or participate in a survey, contest, or promotional offer.
- **Through Our Offline Services:** We may collect Personal Information from you offline, such as when you visit our websites, make a reservation over the phone or contact customer service.
- **From Other Sources:** We may receive your Personal Information from other sources, such as public databases, joint marketing partners, and other third parties. This may include information from your travel agent, airline, credit card, and other partners, and from social media platforms (including from people with whom you are friends or otherwise connected). For example, if you select to login to, connect with or link to, the Online Services using your social media account, certain Personal Information from your social media account will be shared with us, which may include Personal Information that is part of your profile.



## Use of Personal Information

We may use Personal Information in a variety of ways, including:

- To provide the services you request, such as to facilitate reservations, send confirmations or pre-arrival messages, to assist you with meetings, events or celebrations, and provide you with other information about the area and our hotel..
- To complete and fulfill your reservation and stay, for example, to process your payment, ensure that your room is available, and provide you with related customer service.
- To send you administrative information, marketing communications, promotional offers, periodic customer satisfaction, market research or quality assurance surveys.
- To personalize your experience when you stay in our properties and with respect to the Online Services by presenting products and offers tailored to you.
- For our business purposes, such as data analysis, audits, security and fraud monitoring and prevention (including through the use of closed circuit television, card keys, and other security systems), developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

## Disclosure of Personal Information

Your Personal Information may be disclosed in connection with the following services that we provide:

- **Reservations:** The Personal Information you provide to us for making a reservation is processed for the purpose of meeting your reservation request. After your stay we retain your Personal Information including details of your stay, preferences, room/accommodation type and amenities used.
- **To Service Providers:** We may disclose Personal Information to our third party service providers who provide services such as transport from/to the airport, spa, Kids Club, boat rentals and restaurants within our hotel, website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing and other services.
- **Through Social Media:** We may disclose your Personal Information to your friends associated with your social media account, to other website users and to your social media account provider, in connection with your social sharing activity, such as if you connect your social media account to other Online Services or log-into other Online Services from your social media account. By connecting Other Online Services with your social media account, you authorize us to share information with your social media account provider, and you understand that the use of the information we share will be governed by the social media site's privacy policy. If you do not want your Personal Information shared with other users or with your social media account provider, please do not connect your social media account with Other Online Services.
- We may also use and disclose Personal Information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

## Collection of Other Information

“**Other Information**” is any information that does not reveal your specific identity or does not directly relate to an individual, such as:

- Browser and device information
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you
- Aggregated information

If we are required to treat Other Information as Personal Information under applicable law, then we may use it for the purposes for which we use and disclose Personal Information as detailed in this Statement.



We and our third party service providers may collect Other Information in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Online Services (such as the Apps) you are using. We use this information to ensure that the Online Services function properly.
- **Using cookies:** Cookies are pieces of information stored directly on the computer or mobile device that you are using. Cookies allow us to collect information such as browser type, time spent on the Online Services, pages visited, referring URL, language preferences, and other aggregated traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, to collect statistical information, to personalize your experience while using the Online Services and to recognize your computer in order to assist your use of the Online Services, such as for the online reservation process. We also gather statistical information about use of the Online Services in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them.

Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Online Services or to send you advertisements and marketing emails. We may also use cookies or other technologies to track responses to our online advertisements and marketing emails. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. You can choose whether to accept cookies by changing the settings on your browser. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Online Services. For example, we may not be able to recognize your computer, and you may need to log in every time you visit. You also may not receive advertising or other offers from us that are relevant to your interests and needs. At this time, we do not respond to browser "Do-Not-Track" signals.

- **Using pixel tags and other similar technologies:** Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Online Services to, among other things, track the actions of users of the Online Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Online Services and response rates. We also use Google Analytics and Adobe Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. These services may collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), and opt-out by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>. You can learn more about Adobe and opt-out by visiting <http://www.adobe.com/privacy/opt-out.html>.
- **IP Address:** Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address may be identified and logged automatically in our server log files whenever a user accesses the Online Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Online Services. We may also derive your approximate location from your IP address.

**By aggregating information:** Aggregated Personal Information does not personally identify you or any other user of the Services (for example, we may aggregate Personal Information to calculate the percentage of our users who have a particular telephone area code).

#### Use and Disclosure of Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal



Information (such as combining your name with your location). If we do, we will treat the combined information as Personal Information as long as it is combined.

**Third Party Services:** This Privacy Statement does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Services link, third party payment services, or any third-party website that is the landing page of the high-speed Internet providers at our hotel. The inclusion of a link on the Online Services does not imply endorsement of the linked site or service by us or by our affiliates. We have no control over, and are not responsible for, this third party's collection, use and disclosure of your Personal Information.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

### Security

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "Contacting Us" section below.

### Choices, Access and Retention

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt out by visiting our unsubscribe page or by following the instructions in any such email you receive from us.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out (for example invoicing, Audit or TAX purposes).

Within thirty days of receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

### How you can access, change or suppress your Personal Information:

If you would like to review, correct, update, suppress or delete Personal Information that you have previously provided to us, you may contact us at [info@oceanoshotels.gr](mailto:info@oceanoshotels.gr) or [info@sigmahospitalitygroup.com](mailto:info@sigmahospitalitygroup.com)

**Oceanos Hotels Group Greece | Sigma Hospitality & Tourism Group Greece**

**Head Office: Plaza Business Center, 1 Pireos Street, GR73131, Chania, Crete, Greece**

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database, or other limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.



**Retention:** Unless specifically requested, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services or otherwise to us.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or reservation, or enter a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such purchase, reservation, or promotion). There may also be residual information that will remain within our databases and other records, which will not be removed. In addition, there may be certain information to which we are unable to enable you to review, for legal, security, or other reasons.

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

#### **Use of Services by Minors**

The Services are not directed to individuals under the age of thirteen (13).

#### **Cross-Border Transfer**

We do not transfer any Personal and Other Information collected in connection with the Services, to any entity in countries where information protection standards may differ from those in the EU.

#### **Updates to This Privacy Statement**

We may change this Privacy Statement. The "*LAST UPDATED*" legend at the top of this page indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on the Online Services. Your use of the Services following these changes means that you accept the revised Privacy Statement.

#### **Contacting Us**

If you have any questions about this Privacy Statement, please contact us at [info@oceanoshotels.gr](mailto:info@oceanoshotels.gr) or [info@sigmahospitalitygroup.com](mailto:info@sigmahospitalitygroup.com)