

The Art of Alpine Luxury

Data privacy should not be a luxury, but should come as standard. As far as we are concerned, this also includes protection of your personal privacy.

For Priora Suisse AG, Freiestrasse 150, 8807 Freienbach, Switzerland, as operator of the website for the 7132 Hotel, 7132 House of Architects and 7132 Glenner, it therefore goes without saying that we observe and comply with the provisions of the Swiss Federal Act on Data Protection (FADP), the Ordinance to the Federal Act on Data Protection (OFADP), the Telecommunications Act (TCA) and, in particular, the EU General Data Protection Regulation (GDPR).

This data privacy statement is designed to inform you which personal data we collect from you, the purposes for which we use it and to give you an overview of your rights.

1. General principles of our data collection and processing

Our data collection and processing are governed by the principles set out in Art. 5 GDPR. This states that any processing of personal data must comply with the applicable law (principle of legality), that you as a user can know or realise which data is being procured (principle of fairness and transparency), that data will be processed only for the purpose that we state when we obtain the data (purpose limitation), that collection and processing of personal data will be restricted to the minimum (data minimisation), that the data is correct and up to date (principle of accuracy), that personal data must only be stored for as long as the data processing requires in a form that allows the data subject to be identified (principle of storage limitation), and that your personal data is processed with a guarantee of appropriate protection (integrity and confidentiality).

We implement these principles in an individual case according to the following statements.

2. Data collection and processing when you visit our website

a) Accessing our website

When you access our website, our servers temporarily store the following data, until it is automatically deleted after 14 months at the latest :

- Date and time of access
- Requesting PC's IP address
- Name of the IP domain owner (generally your internet access provider)
- Website from which the access was made, with the search term used, as applicable
- Name and URL of the file accessed
- The status code (e.g. error message)
- Your PC's operating system
- The browser you use
- The transfer protocol used
- Your user name from a registration/authentication, as applicable

This data is collected and used to ensure an efficient website and to facilitate optimisation of our internet offering, as well as for internal statistical purposes. Therein lies our legitimate interest in data processing according to Art. 5 (1) FADP and Art. 6 (1f) GDPR.

We furthermore have a legitimate interest according to Art. 6 (1f) GDPR and Art. 5 (1) FADP in collecting and processing the IP address and other data for clarification and defence in the event of unauthorised use or misuse. This data can be used against the user within the scope of civil and/or criminal proceedings.

b) Contact form

If you use one of our contact forms to contact us, we require the following essential information from you:

- Title, surname and first name
- Your email address
- Telephone number and home address, as applicable

This data, and any other information supplied voluntarily by you (e.g. date of birth), is collected and processed exclusively for the purpose of being able to provide the best possible, personalised reply to your enquiry that meets your wishes and needs. It is therefore necessary for the performance of precontractual activities in accordance with Art. 6 (1b) GDPR and is therefore in our legitimate interest according to Art. 6 (1f) GDPR.

c) Newsletter

You have the option of subscribing to our newsletter on the website in order to be kept informed of our activities and offers on a regular basis. When you subscribe, we need the following information from you:

- Title, surname and first name
- Your email address

You can also provide other voluntary information in addition to this essential data. This data is processed exclusively to tailor our information and offers as closely as possible to your personal needs.

By subscribing, you are giving your consent to processing of the data provided and authorise us to send the newsletter regularly to the address you have provided, and for the statistical analysis of usage and newsletter optimisation. This consent forms the legal basis for processing of your data according to Art. 6 (1a) GDPR. Furthermore, your consent also means that we can instruct third parties with the technical handling of advertising activities and can forward your data to these third parties for this purpose.

We would like to draw to your attention to the fact that you can unsubscribe from the newsletter at any time by clicking on the link provided at the end of each newsletter. Your personal data will then be erased. It will only be processed further in anonymised form to optimise the information and offers in our newsletter.

d) Your bookings

You can book via our website, by letter or email, or by telephone. In order to organise your stay in accordance with your wishes and to ensure smooth contract management, we need the following essential information from you:

- Title, surname and first name of all guests
- Home postal address

- Date of birth
- Telephone number
- Email address
- Credit card details
- Any other information required by law (to process hospitality tax, due to current COVID-19 legislation, etc.).

Your credit card details will be encrypted for further processing.

You have the option of providing other information voluntarily (e.g. your car's registration plate, arrival time, special requests and preferences) so that we can tailor our services to your specific needs and make your stay as enjoyable as possible.

Collection and processing of this data takes place solely within the scope of smooth performance of a contract according to Art. 6 (1b) GDPR. This means that we can organise your booking in accordance with your wishes as much as possible, provide our services, ensure smooth payment processes and contact you in the event of queries or problems.

e) Thermal spa, wellness area, restaurants

You may be asked to provide additional personal information (such as state of health, allergies, etc.) when you visit the thermal spa or wellness area if this information is required for your health, wellbeing, a treatment's success or in the legitimate interests of our other guests or smooth running of our business. You can also inform our employees voluntarily of circumstances that you feel we should know of (e.g. food allergies, special preferences, etc.).

We collect and process this data solely for the aforementioned purposes on the legal basis of contract performance in accordance with Art. 6 (1b) GDPR and our legitimate interest according to Art. 6 (1f) GDPR.

3. Our cookie policy

Cookies are small data sets that your web browser stores automatically on your computer's hard disk when you visit our website. We use cookies to make your visit to our website more pleasant and meaningful. We would like to point out that cookies can also be used to analyse your browsing behaviour so that we can optimise our services.

Most web browsers accept cookies automatically, without notifying you when you visit the website. You can, however, configure your browser so that cookies can be stored and you receive a notification every time a cookie is placed. Check your browser information for how to configure the settings. You can usually do this through the browser's settings or under "Data Privacy" or "Content Settings" on devices. We would like to point out, however, that general deactivation of cookies may mean you are not able to use all the functions on our website.

If you have not generally deactivated cookies, you will see what is known as a "cookie banner" when you visit our website as we need your consent to use cookies (Art. 6 (1a) GDPR). Essential cookies are technically necessary to provide the website and its functions, so you cannot deselect or refuse them. Our use of these cookies is based on our legitimate interest according to Art. 6 (1f) GDPR. You can refuse or restrict all other cookies using the appropriate setting.

4. Tracking tools

Google Analytics

We use the Google Analytics web analysis service for the purposes of needs-based and continuous optimisation of our website. Pseudonymised user profiles are created and small text files that are stored on your computer ("cookies") are used in this context. The information generated by the cookie about your use of this website is transferred to this service provider's servers, stored there and edited for us. As a result, depending on the circumstances, we receive the following information in addition to the data mentioned in section 1:

- The path the visitor navigates through the site
- The time the visitor spends on the website or subpage
- The subpage from which the visitor leaves the website
- The country, region or city from which the website is accessed
- Terminal device (type, version, colour intensity, resolution, browser window width and height) and returning or new visitors.

The information is used to analyse website use, compile reports about website activities and also provide other services associated with use of the website and internet for the purposes of market research and adequate website design. This information will also be transmitted to third parties, as the case arises, if prescribed by law or if third parties process this data on our behalf.

Google Analytics is provided by Google LLC, headquartered in the USA: 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351. Before the data is transmitted to the provider, the IP address is shortened by activating IP anonymisation ("anonymizeIP") on this website within European Union Member States or in other states that are signatories to the European Economic Area treaty. The anonymised IP address transmitted from your browser as part of Google Analytics will not be combined with other data by Google. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and abbreviated there. In such cases, we ensure that Google Inc. adheres to an adequate standard of data protection by means of contractual undertakings. According to Google Inc., under no circumstances will the IP address be combined with other data concerning the user.

Google Tag Manager

We use Google Tag Manager from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google") on our website. Google Tag Manager is a solution that lets marketers manage website tags via an interface. The Tag Manager tool is a cookieless domain and does not collect personal data. The tool triggers other tags that do collect personal data. According to Google, Google Tag Manager does not access this data. If there has been deactivation at domain or cookie level, this applies to all tracking tags that have been implemented using Google Tag Manager. You can prevent tags being placed at any time (see section 10).

The legal basis for processing data for this purpose is our legitimate interest according to Art. 6 (1f) GDPR.

Google Ads

We have integrated Google Ads into our website. Google Ads is an internet advertising service that lets advertisers insert advertisements in Google's search engine results and in the Google advertising network. Google Ads makes it possible to specify pre-determined keywords, as a result of which an advertisement in Google's search engine results is then displayed only if the user with the search engine clicks on a keyword-related search result. Advertisements in the Google advertising network are distributed across relevant websites using an automatic algorithm and having regard to the predetermined keywords. Google Ads is operated by Google LLC, 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

Google Maps

We use Google Maps API (Application Programming Interface, "Google Maps") from Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA on our website to visually display geographical information (location maps). Through the use of Google Maps, information on the use of our website, including your IP address, will be transmitted to a Google server in the USA and stored there.

The legal basis for processing data for this purpose is our legitimate interest according to Art. 6 (1f) GDPR.

You can find additional information on the Google services we use and your related rights in Google's Data Privacy Policy:

<https://policies.google.com/privacy>

Facebook Custom Audience

We use Facebook Website Custom Audiences on our websites. This means that Facebook Pixels (JavaScript) are integrated into our websites. These pixels generate a checksum from your usage data, such as browser information, that is transmitted to Facebook. If it is present, the Facebook cookie will also be activated and your Facebook ID will be transmitted. If you have a Facebook profile and log on to Facebook, targeted, customised advertising for Giardino products may be displayed to you using the data transmitted by the pixel. Facebook disposes of data – unused – from users that do not have a Facebook profile.

Links to our social media presences

Our website contains links to social media networks. These are not social media network plugins that transmit data to the provider without the user's influence as soon the website is accessed. The social media network button merely contains a link to our social media presence. The website does not transmit user data to the social media network.

The links lead to our presence on the following networks:

- Facebook: Meta Platforms Inc., 1601 S California Ave, Palo Alto, CA 94304, USA
- Instagram: Instagram Inc., 1601 Willow Road, Menlo Park, CA 94025, USA

If you click on a link to one of our social media profiles, a direct connection is established between your browser and the respective social network's server. As a result, the network is informed that you have visited our website using your IP address and have clicked on the link. When you click on a link to a network while you are logged in to your account on the network in question, our site's content may be linked to your profile on the network, which means that the network can match your visit to our website directly to your user account. If you wish to prevent this, you should log out before clicking on the links in question. The connection will be made in any case if you log on to the relevant network after clicking on the social media link on our website.

5. Data processing in connection with your stay

a) Statutory reporting duty

The law (hospitality and police law) dictates that, under certain circumstances, we are obliged to pass your personal data on to government authorities. This occurs only if there is a corresponding statutory reporting regulation. It concerns the follow personal data, as applicable:

- Surname and first name
- Postal address
- Date of birth
- Nationality
- Official document for identification purposes (passport/identity card) and number
- Arrival and departure dates and room number

The fulfilment of our statutory obligations is our legitimate interest according to Art. 6 (1f) GDPR.

b) Recourse to additional services during your stay

If you use additional services during your stay (spa, restaurant, transfer, etc.), the services will be recorded and processed for invoicing purposes. The legal basis for this data collection and processing lies in performance of the contract according to Art. 6 (1b) GDPR.

6. Storage and exchange of data with third parties

a) Reservation platforms

If you use a reservation platform to make your booking, this will usually provide us with the same information as you would give us when making a direct booking. In addition, your booking enquiries will also be forwarded to us. We only process this information to fulfil the contract in accordance with Art. 6 (1b) GDPR in order to execute your booking in accordance with your needs and wishes.

Please also note the data privacy information on the reservation platform.

As the case arises, the reservation platform operator also informs us of disputes in connection with the booking. If so, data concerning the booking process may also be transmitted to us and we will use this to uphold and assert our claims. This processing is based on Art. 6 (1f) GDPR.

b) Forwarding of data to third parties

We only pass personal data on to third parties if:

- We have your consent;
- There is a statutory obligation;
- Required by the enforcement of our claims arising from the contractual relationship;
- Required within the scope of website use; or
- Required for the performance of the contract, in particular processing of your booking.

Our website is hosted by Iway AG, Badenerstrasse 569, 8048 Zurich on servers in Switzerland. Data is forwarded to this service provider for the purpose of provision and maintenance of our website's functionality, which is in our legitimate interest according to Art. 6 (1f) GDPR.

When you pay by credit card via the website or in the hotel, we forward your credit card details to your credit card issuer and to the credit card acquirer. The legal basis for forwarding lies in performance of the contract according to Art. 6 (1b) GDPR. With regard to processing of your data by these third parties, please consult your credit card issuer's data privacy statement.

7. Central storage and linking of data

We store the data specified in this data privacy statement in a central, electronic data processing system. The data concerning you is systematically collected and linked in order to process your booking and provide the contractual services. We use Protel software from Rebag Data AG, Einsiedlerstrasse 533, 8810 Horgen, Switzerland for this.

Personal data for room reservations via our website is collected and sent to us by SimpleBooking (QNT S.r.l a Socio Unico, via Lucca 52, 50142 Florence, Italy).

We use Dailypoint software, made by Toedt, Dr. Selk & Coll. GmbH, Augustenstrasse 79, 80333 Munich, Germany, to create individual correspondence (pre-stay letter, post-stay letter).

We use software from TAC Informationstechnologie GmbH, Schildbach 111, 8230 Hartberg, Austria to collect your data during reservations at our restaurants, in the wellness area and thermal spa.

We base the processing of this data within the scope of the software on our legitimate interest in customer-friendly and efficient management of customer data according to Art. 6 (1f) GDPR.

8. Retention period

Unless obliged to observe a longer storage period by statutory retention periods (e.g. under reporting law, tax law, accounting law, etc. – usually 10 years), we store your personal data only for as long as is necessary to use the tracking services mentioned in this data privacy statement and other processing that is in our legitimate interest and/or is necessary for performance of the contract. After that, the data is blocked and may only be used for the legal purposes, i.e. in support of accounting and for tax purposes.

9. Transmission of personal data abroad

Within the scope of the data processing described in this data privacy statement, we are entitled to transfer your personal data to authorised service providers abroad. Where applicable, we ensure contractually that the level of protection accorded your personal data corresponds to that in Switzerland and the EU if the level of protection in the country in question does not satisfy these requirements.

10. Your rights as user

You have the right to request **information** on the personal data we store about you. You also have the right to **rectification** of incorrect data and the right to **erasure** of your personal data, if not prevented by the statutory duty of retention or a legal justification for consent that permits us to process the data.

You also have the right to **demand return** of the data that you have surrendered to us (right to data portability). On request, we will also forward the data to a third party of your choice. You have the right to receive the data in a commonly used format.

11. Contact

Would you like to assert one of the above rights?

Do you have any questions, complaints or suggestions concerning how we can improve our data privacy?

Use the following email address to contact our front office manager and explain your concerns regarding protection of your personal data:

(hotel@7132.com)

At our discretion, we may request proof of identity in order to deal with your requests.

12. Data security

We bind our employees and external services providers to secrecy and to comply with the provisions of data protection law.

We use suitable technical and organisational security measures to protect your data against manipulation, loss and unauthorised access. These are constantly updated in keeping with technological developments.

13. Note concerning transmission of data to the USA

For the sake of completeness, we would like to point out for the benefit of users who live or have their registered office in Switzerland that the US authorities operate monitoring activities that generally allow the storage of any personal data for all persons whose data is transmitted from Switzerland to the USA. This occurs without distinction, restriction or exception on the basis of the objective pursued and without an objective criterion that makes it possible to restrict the US authorities' access to the data and its subsequent use to very specific, strictly limited purposes that are likely to justify the intervention associated with access to this data and its use. We would also like to point out that there is no legal remedy in the USA for the affected people from Switzerland that gives them access to the data pertaining to them and brings about its rectification or erasure, and no effective legal protection through the courts against the US authorities' general rights of access. We explicitly draw the attention of those concerned to this factual and legal situation so that they can take an appropriately informed decision on consent to the use of their data.

We would like to point out to users who reside in an EU Member State that the European Union believes the USA does not have an adequate level of data protection – among other things due to the issues mentioned in this section. As we have explained in this data privacy statement, some data recipients (such as Google) have their registered offices in the USA. We ensure either through contractual arrangements with these companies or by ensuring that these companies are certified under the EU or Swiss-EU Privacy Shield that our partners provide an adequate level of protection for your data.

14. Right to complain to a data protection authority

For the sake of completeness, we would like to draw it to your attention to the fact that you can complain to a data protection authority at any time.

Vals, December 2021