

## Data Privacy Policy 7132 Hotels

### 1. New data protection law

Data protection has become increasingly important in our digitalized world. To further strengthen the protection of personal data, the new Data Protection Act (DPA) and the new Data Protection Ordinance (DPO) came into force on September 1, 2023.

The purpose of this privacy policy is to explain how we process your personal data as a customer of one of our hotels. According to Art. 3 DAP, «personal data» is any information relating to an identified or identifiable natural person. The Data Protection Act defines «processing» as any handling of personal data, in particular the collection, storage, retention, use, modification, disclosure, archiving, deletion, or destruction of data (e.g. name, date of birth, e-mail address, address, arrival and departure date, ...).

This privacy policy also provides you with information about the identity and contact details of the controller, the purpose of processing and the recipients of personal data.

It is important that you take note of this privacy policy. If you have any questions or uncertainties, please contact the person responsible (section 2 below).

### 2. Information on the identity and contact details of the controller

The following person is responsible for data processing:

Mrs. Lisa Holzinger (Front Office Manager)

### 3. Principles of our data collection and processing

We base our data collection on the principles set out in the provisions of the DPA and the DPO, as well as the principles of the EU General Data Protection Regulation (GDPR). These state that any processing of personal data must comply with the applicable legal system (principle of lawfulness), that you as a user know and can recognize which data is being obtained (principle of good faith/transparency), that data is only processed for the purpose that we specify when obtaining the data (purpose limitation principle), that the collection and processing of personal data is limited to the necessary minimum (principle of data minimisation), that the data is correct and up to date (principle of accuracy), that personal data may only be stored for as long as the purpose of the data processing requires, in a form that enables the identification of the data subject (principle of storage limitation) and that the processing of your personal data is carried out with appropriate protection (principle of integrity and confidentiality).

### 4. Data that we process and purpose of processing

We process personal data that you have provided to us or that we have received from third parties (e.g. publicly accessible sources of information). If you provide us with data about other persons (e.g. accompanying guests), we assume that you are authorized to do so and that this data is correct. We ask you to ensure that these third parties are informed about our data processing.

Please note that we only process personal data if you provide it to us voluntarily. We may also need to process particularly sensitive personal data (e.g. about your health, allergies or eating habits).

In particular, we process the following categories of personal data in particular:

- **Data that we require for the conclusion and fulfilment of the contract with you:** This includes, for example, title, surname, first name, date of birth, telephone number, e-mail address, credit card information, special requests communicated by you, arrival and departure date.

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- **Data for the provision of additional services:** This includes, for example, information about your state of health if you make use of health treatments or rent sports equipment.
- **Data in connection with the use of our IT infrastructure:** We also process data that is generated when using our IT infrastructure, namely information about the device and its configuration (e.g. operating system, language settings; approximate location and time of use), protocols (log data), IP address of the device used and other device IDs (e.g. MAC address).
- **Statistical evaluations, complaints:** We process data that you provide to us in customer surveys in order to improve our services.
- **Data to fulfil our legal reporting obligations:** Due to legislation (hospitality and police law), we are obliged in certain circumstances to forward your personal data to state authorities. In any case, your data will only be forwarded if there is a corresponding legal requirement to do so.

We only process personal data to the extent necessary to fulfil the contract with you or if you have given your consent. Your personal data will only be processed in compliance with the applicable legal requirements for the purposes that are evident from the circumstances or that have been indicated to you.

In particular, we process personal data for the following purposes:

- **Conclusion and fulfilment of the contract with you**
- **Statistical analyses**
- **Fulfilment of legal reporting obligations**
- **Security purposes** (where necessary for the protection of the personal integrity of our customers and employees)
- **Enforcement of our claims arising from the contract and legal disputes**

Our privacy policy for our website provides detailed information on the data that we collect and process when you contact us via our website. You can access it on our website (Disclaimer).

## 5. Recipients of personal data

We only pass on personal data to third parties if:

- You have given your consent;
- There is a legal obligation to do so;
- The enforcement of our claims, namely from the contractual relationship, requires it; or
- The fulfilment of the contract, in particular the processing of your booking, requires it.

## 6. Retention period

Unless statutory retention obligations (e.g. in registration law, tax law, accounting law - usually 10 years) oblige us to retain data for a longer period, we will only store your personal data for as long as is necessary to carry out the processing specified in this data protection declaration, which is in our legitimate interest and/or necessary for the fulfilment of the contract. Thereafter, the data will be blocked and may only be used for the purposes prescribed by law, e.g. as supporting documents for accounting and tax purposes.

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## 7. Disclosure of personal data abroad

We are authorized to transfer your personal data to contracted service providers abroad as part of the data processing described in this privacy policy. If necessary, we will contractually ensure that the protection of your personal data corresponds to the level of protection in Switzerland and the EU if the level of protection in the country in question does not meet these requirements.

## 8. Your rights as customer

You have the right to request **information** about the personal data that we store about you. In addition, you have the right to have incorrect data **corrected** and the right to have your personal data **deleted**, provided that this does not conflict with any legal obligation to retain data or any authorization that allows us to process the data. You can also **object** to our data processing at any time if this is not necessary for the fulfilment of the contract or, if the processing is based on your consent, you can **revoke** this consent at any time.

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

## 9. Data security

Our employees and external service providers have been obliged by us to maintain confidentiality and to comply with data protection regulations.

We use suitable technical and organizational security measures to protect your data against manipulation, loss and unauthorized access. We continually adapt these to technological developments.

## 10. Amendment of this privacy policy

Please note that this data protection declaration is not part of the contract with you and can therefore be amended unilaterally by us at any time.

Vals/Lenzerheide, October 2023