

Statement

Personal Data Protection Policy of the company BIO BEACH Single Member S.A

Last update: 26/2/2021

This Personal Data Protection Policy Statement (hereinafter: "Statement") applies to the company BIO BEACH Single Member S.A, its subsidiaries and all hotels within the group BIO BEACH Single Member S.A. (hereinafter: "hotel", company or group name, "we", "us").

In BIO BEACH BOUTIQUE HOTEL we strive to deliver high quality products, services and experiences to all our clients. Recognising the importance of personal data protection, we have drafted this Statement, in order to explain our practices as regards the collection of personal data from you or about you, in this website or via our applications, when you contact us in written or oral form, and the collection of data during your visit of our premises, or data coming from other sources. This Statement outlines our practices which are adopted in line with EU law and Greek national law.

By using any of our products or services and/or by consenting to the present Statement, e.g. in the context of registering for any of our products or services, you understand and acknowledge that we collect and use personal data as outlined in the present Statement.

Please note that this Statement does not apply to our potential processing of personal data on behalf of third parties or subject to the instructions given by third parties such as airlines, car rental companies and other service providers, companies that organize or offer packaged travel arrangements, marketing partners or corporate clients. In that case, your consent will be requested again in accordance with the instructions given by third parties.

Collection of personal data

We collect personal data in all points of contact or interaction with guests. Such personal data may include: name, postal address, pricing address, telephone number, information about the reservation, your stay or visit in any of our premises, membership or loyalty programmes (including payment cards indicating the brand name of group, hotel or other collaborating programmes), participation in contests, offers or marketing programmes, information about acquisition and receipt of products and services, personal information such as food preferences, nationality, passport number, date and place of issuance, history of previous visits to our hotel or any other hotel of our group, payment information such as payment card number and other payment card information, as well as verification information and other billing and accounting information, client preferences, marketing and communication material preferences, information about vehicles which may be brought to our premises, reviews and opinions regarding our hotel facilities and premises, reservation including hotel package, airline of travel to obtain inbound/outbound flight number for better service and car rental, if you request mediation or garage services in our premises, connected groups regarding hotel stay, information that you choose to provide to us or we may collect about you to provide the highest level of services.

- *Surveys:* We may ask for demographics or other personal information in the framework of client surveys. Such data will be used for statistical purposes in line with the applicable law.

- *Data collection during your stay at our premises:* We collect additional personal data upon checking-in/entrance in our premises, including information which may be required by local law. We may use closed circuit television and other security measures at our premises that may capture or record images of guests and visitors in public areas, as well as information related to your location while on our premises (via key cards and other technologies). Moreover, we may collect personal data in relation to services provided in our premises, such as concierge services, fitness clubs, spas, various activities, childcare services, equipment rental.
- *Event profiling:* If you plan an event by us, we collect the following information: meeting and event specifications, event date, guest number, details about rooms of guests and business events, information about the company, in case of a legal person, with a view to providing better service. We also collect information about guests who are part of your group or event. If you visit us as part of a group, we may have your personal data collected via the group and promote services to you in relation to your stay with a group or your attendance at an event according to your preferences, if permitted by law and if you have granted written consent.
- *Social media:* If you choose to participate in social media activities or offers, we may collect, upon your consent, information from your social media account, such as location, check-ins, activities, hobbies, photographs, status updates and friend list. You may also be allowed to participate in contests and provide photographs, including from your stay by us, which you can share with your contacts in social media for voting, published offers or other advertising purposes.

Use of collected personal data

We use your personal data in various ways to provide and adapt the hotel service level requested and expected, to provide the expected hospitality level in our rooms and all premises, to manage the programme “name of membership programme if you wish to join”, to promote marketing and sales activities and as defined in detail hereafter. We shall request your consent before processing your data when required by applicable legislation.

We are obliged to collect specific data, such as your name, address, payment information and, for some countries, travel document details, for the purpose of processing your reservation. Failure to provide such information results in impossibility of processing your reservation.

- *Service management:* We use your personal data to manage the programmes in which you participate, providing access to your account information, such as reward status and offers for which you fulfil the conditions.
- *Meeting and event planning:* We may use your personal data to inform you about planned meetings and events, e.g. congresses.
- *Marketing and communication:* To the extent permitted, we may use your personal data to send or offer information letters, advertisements and recommended special offers at your email, as well as other marketing messages in accordance with the communication preferences you have set. We use your data to send messages during

your stay, account notifications and booking confirmations, to send marketing messages and to conduct surveys, lotteries, prize draws and other contests which may be organised within our group. We may send such notifications via internet, post, online advertisements, social media, telephone, text messages (including SMS and MMS), push notifications, application messages and other channels (including internal messaging, e.g. via television in your room). Upon your consent, we also use content created by users (such as photographs) from social media to provide advertising messages or content appearing in our website and applications.

- *Improving service quality:* We may use your personal data to improve our hotel service quality and to ensure that our website, products and services are interesting for you. We also use your personal data to provide the expected level of hospitality in our rooms and our premises in general. This may include enabling you to control your room equipment via our website or our applications in your personal devices.
- *Correctness of data, analytics and customization:* We may complete your personal data with data from third parties in order to keep information and analytics updated. We also build on data received from third parties for better and more customized services. For instance, if you link your social media or other accounts with our services, we may use related data to make your experience by us more personal or social, or share them and use them as described in other parts of this Statement.

Sharing of personal data

For the purpose of providing the expected level of hospitality and the highest level of service, your personal data may be used jointly by third parties as described in detail hereafter:

- *Group events or meetings:* If you visit a hotel of our group in the context of a group event or meeting, information collected to plan the event or meeting may be used jointly by the planners of such event or meeting and, when required, by our guests who organize or participate in such event or meeting.
- *Services offered in our premises:* We may share your personal data with service providers in our premises, such as providers of concierge services, spa and fitness services, or catering services.
- *Business transactions:* As we develop our business activities, we may buy, sell, restructure or rearrange our businesses or assets, or cease to be managers or licensors of a hotel which is currently part of our group. In such cases, our Company shall have full discretion regarding the transfer, selling or allocation of information it has collected, including, but not limited to, personal and other data (as described hereafter) to one or more third parties, company-related or not, as regards these business transactions. If required by local law, we will inform you about our intention to transfer your personal data to third parties for the above-mentioned reason and will explain how you can object such transfer.
- *Others:* Furthermore, the Company can disclose personal data for the following purposes: (i) to comply with applicable legislation; (ii) to respond to government surveys or requests by public authorities; (iii) to comply with valid legal procedures;

(iv) to protect the rights, personal data, security or assets of the Company, website visitors, clients, employees or the public; (v) to be able to find appropriate solutions or limit potential damage; (vi) to impose the terms and conditions of our website and (vii) to respond to emergencies.

Other data

We use cookies and other technologies (such as pixel tags, web beacons, clear GIFs, e-mail hyperlinks, JavaScript, Google or Apple device ID and similar technologies) to collect these data. If you wish to remove or reject cookies from your device at any time, you can update the settings of your browser (open the Help menu of your browser to learn how to remove and reject cookies). The Company shall not be responsible for the settings of your browser. You can find simple and useful instructions about cookies management in various browsers at www.allaboutcookies.org.

Sensitive data

The term “Sensitive data” means data regarding your racial origin, nationality, political, religious or philosophical beliefs, health history, sexual life and orientation, genetic information, criminal record and biometric data used for identification.

In general, we do not collect sensitive data unless you provide them voluntarily or required under applicable legislation and rules. We may use data regarding your health status which are provided exclusively by you, in order to provide better service and cover your needs (e.g. to ensure access for disabled persons, medical information to allow use of spa, etc).

Children’s personal data

We do not knowingly collect personal data of persons under the age of 18. As a parent or legal custodian, do not allow your children to provide personal data without your permission.

Smartphone services and location-based services

We provide mobile device applications, which you can download on a smartphone or other mobile device. Such applications include various functions enhancing the client experience. Combined with provided services, these applications may collect personal and other data which shall be used in line with the present Statement. For instance, to make or change a reservation, including reservation for a reward stay, you will be requested to input specific personal data, such as your loyalty programme account or other information needed. A link to this Notice shall appear before downloading any of our applications.

If you allow our mobile device applications to have access to your device location information, our applications may use GPS and other technologies (such as wireless transmitters) to provide information and offers in relation to your device’s location. Geolocation signals enable us to collect information about your location in the collaborating hotels, communicating via other mobile devices. We may use such location information to improve your experience in our premises, by sending notifications and other material to your mobile device, offering orientation assistance as you move in our premises and sending information and offers about products, services or activities which we believe you might have interest in. We may also share such data with third parties, including our business partners and service providers, with a view to providing information, offers and services which you might have

interest in. You can prevent or restrict the collection of location information by changing your device settings. All these geolocation services are provided only to the extent permitted by applicable local law.

Website links and third party services

Our website and mobile applications may contain links to third party websites. Please note that we bear no responsibility for the collection, use, retention, sharing or disclosure of data or information by such third parties. If you enter information on third party websites, the personal data protection policy and terms of use of these websites apply. It is recommended to read the personal data protection policy of the websites you visit before entering any personal data.

The Company may also collaborate with specific internet service providers to provide internet access to our clients. The use of internet services in our premises is subject to the terms of use and the privacy protection policy of the internet service provider. You can gain access to these terms and policy by clicking on the links appearing on the registration webpage or by visiting the website of the internet service provider.

Personal data protection

The Company takes reasonable measures to: (i) protect personal data from unauthorized access, sharing, modification or deletion and (ii) keep accurate and updated personal data, as appropriate. The Company employs a robust internal team of professionals committed to data protection, who are responsible for creating, updating and managing our security scheme. In the event of a security incident, the Company shall notify regulatory authorities and/or consumers as required by the applicable laws and regulations.

We also require our partners and service providers with whom we share personal data to make reasonable efforts to maintain the confidentiality of personal data. In electronic transactions, we use appropriate technological measures to protect the personal data that you send to us via our website. However, no online security or data transmission system can guarantee full security.

To protect your personal data, we advise against sending us payment card information or other sensitive personal data via email, if the Company hasn't requested so.

We will never ask you to send us any confidential personal data or payment card information via mobile device or SMS or email. We will ask for your payment card information via telephone only if you make a reservation or book a promotional package via telephone. If you receive any such request, do not reply and kindly inform us in info@biobeach.gr.

Changing and accessing your personal data

To the extent required by applicable law, you may be able to request that we inform you about the personal data we maintain about you and, where appropriate, request that we update, correct, delete, and/or stop processing your personal data that we maintain in our active data base. We will make all required updates and changes within the period specified

by applicable law and as required by law. Such requests may be submitted by email. To protect confidentiality, we shall reply to such requests only to the email address you have registered by or otherwise provided to us. Please keep in mind that if you send such request, we may not be able to provide the quality and variety of services you are used to.

In addition, in some circumstances based on applicable law, you may request that we cease sharing your personal data with our business partners or that the Company ceases using your personal data by contacting us using the email or postal address above. We will honour those requests as required by applicable law.

Personal data retention

We retain your personal data for the period necessary to fulfil the purposes of this Statement, unless longer retention is required or permitted by applicable law. We retain personal data collected to fulfil guest reservations for five years after the end of the stay. We retain other personal data for shorter periods if possible and permitted by law.

When we destroy your personal information, we do so in a way that prevents that information from being restored or reconstructed.

If this information is printed in paper, it will be destroyed in a secure way, such as via paper shredder or by burning the documents or otherwise. If the information is stored in electronic form, it will be deleted with technical means ensuring that it cannot be restored or reconstructed in the future.

Options – Marketing communications

If you have provided us with your contact details (postal address, email address, or telephone number), we may send you communications, in accordance with your set preferences and your granted consent, to the extent required, about our products and services, event invitations via email, online advertisements, social media, telephone, text messages (SMS or MMS), notifications, in-app alerts, direct mail, via our customer service call centre and other channels (including internal messaging, e.g. via television in your room).

If you prefer not to receive email marketing materials from us, you may opt-out at any time by using the unsubscribe function in any email you receive from us or by clicking this link: www.mailchimp.com. Opt-out requests can take up to ten business days to be effective.

To opt out of text messages, please inform the hotel front desk that you do not want to receive text messages from the hotel or reply “STOP” to the message received.

Changes to this Statement

We may modify this Statement from time to time. When we make substantial changes to this Statement, we will publish a link to the revised Statement on the homepage of our website. If you have subscribed to one of our products or services, we will also notify you via the preferred communication channel. You can find out when this Statement was last updated by referring to the date at the top of the Statement. Any changes to our Statement will become effective upon publishing of the revised Statement on the website. Use of the website, any of

our products and services, and/or granting consent to the updated Statement following such changes constitutes your acceptance of the revised Statement then in effect.

Contact

If you have any questions regarding this Statement or how the Company processes your personal data, or if you want to submit a positive comment or complaint, please contact us by sending an email to info@biobeach.gr or by sending a letter to: BIO BEACH BOUTIQUE HOTEL, 56 Sofokli Venizelou Street, GR-74133, Rethymno, Greece. We will reply the earliest possible and within 30 days.

Appendix

For individuals residing in the EEA, this Appendix outlines certain additional information that the Company is obligated to provide to you, as well as certain rights you have with respect to the processing of your personal data, in line with the European General Data Protection Regulation (Regulation (EU)2016/279, GDPR). This Appendix will control to the extent it conflicts with any provision in the main body of this Statement.

Data controller: Bio Beach Boutique Hotel

Data Protection Officer: The Company's Data Protection Officer may be contacted by email at elenadigenaki@gmail.com, or at the following address: 6 Tzanakaki Street, Chania, GR-73134, Greece. Attn: Elena Digenaki

Purposes and Legal Basis for Processing: The Company processes your personal data for the purposes set forth in Section (Use of collected personal data) and Section (Sharing of personal data) of the main body of this Statement, as outlined in detail above.

The legal bases for the Company's processing activities include processing such data as necessary to comply with our contractual obligations, compliance with our legal obligations, protecting the safety of our employees, guests and others, for our legitimate business interests, and pursuant to your consent.

The particular legal basis for the processing of your personal data is based on the purpose for which such data was provided or collected:

- *Surveys*: Completion of surveys is voluntary – we process the information obtained from surveys on the basis of your consent and in furtherance of our business interests, including marketing, service improvements, and analytics.
- *Collection during your stay in our premises*:
 - When you make a reservation and when you stay at one of our hotel properties, we process your name, address, contact information, along with the details of your stay (arrival and departure day and time, vehicle information and information regarding others traveling or staying with you), on the basis of our contractual relationship with you. We also process such data for our business interests, including for marketing, service improvements, and analytics and service customization, as described in Section of our Personal Data Protection Statement (above).

- We collect certain additional personal information during registration/check-in at our hotels (such as national ID or passport details), as necessary to comply with our legal obligations.
- We use closed circuit television and other security measures at our premises that may capture or record images of guests and visitors in public areas, as well as information related to your location while on our premises (via key cards and other technologies) for the protection of our staff, guests and visitors to our premises.
- We process personal data in relation to services provided in our premises, (such as concierge services, fitness clubs, spas, various activities, childcare services, equipment rental and our Digital Key functionality), in order to provide the services to you and for our business interests including for marketing, service improvements, and analytics and service customization, as described in Section of our Personal Data Protection Statement (above).
- *Event profiling*: We process the personal data obtained in connection with your event on the basis of our contractual relationship with you and for our business interests, including for marketing, service improvements, and analytics and service customization, as described in Section 4 of our Personal Data Protection Statement (above).
- *Social Media*: Participation in social media activities and offerings sponsored by the Company is voluntary - we process data obtained from social media participation on the basis of your consent and in furtherance of our related business interests, including for marketing, service improvements, and analytics and service customization, as described in Section of our Personal Data Protection Statement (above).
- *Promotions and Prize draws*: Participation in prize draws, contests and other promotional offerings is voluntary – we process the information obtained from such participation based on your consent and as necessary to administer the offering. We also use certain data for our business purposes, including for marketing, service improvements, and analytics and service customization, as described in Section of our Personal Data Protection Statement (above).
- *Direct Marketing*: We use your personal data to send you marketing messages on the basis of your consent. You may withdraw your consent for direct marketing communications at any time by contacting us at info@biobeach.gr

Retention: We retain your personal data for the time necessary to accomplish the purpose for which such data has been collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law. Our retention policies reflect applicable provisions of limitation periods and legal requirements.

Data Subject Rights

Access, Correction and Deletion Requests: You have the right to:

- ask us to confirm whether we are processing your personal data;
- receive information on how your data is processed;
- obtain a copy of your personal data;
- request that we update or correct your personal data;
- request that we delete your personal data in certain circumstances.

Right to Object to Processing: You have the right to request that the Company ceases the processing your personal data:

- for marketing activities, such as profiling;
- for statistical purposes;
- where such processing is based on our legitimate business interests, unless we are able to demonstrate a compelling legitimate basis for such processing or we need to process your personal data for the establishment, exercise or defence of a legal claim.

Right to Restrict Processing: You have the right to request that the Company limits the processing of your personal data:

- while the Company is evaluating or in the process of responding to a request by you to update or correct your personal data;
- where such processing is unlawful on the basis of new legislation and you do not want the Company to delete your data;
- where the Company no longer needs such data, but you want us to retain the data for the establishment, exercise or defence of a legal claim;
- where you have submitted an objection to processing based on our legitimate business interests, pending our response to such request.

When we limit the processing of your personal information pursuant to your request, we will inform you prior to re-engaging in such processing.

Data Portability Requests: You have the right to request that we provide you or a third party that you designate with certain of your personal data in a commonly used, machine readable format. Please note, however, that data portability rights apply only to personal data that we have obtained directly from you and only where our processing is based on consent or the signing of a contract.

Submitting Requests: Your requests may be submitted by email to info@biobeach.gr or to the Data Protection Officer at elenadigenaki@gmail.com or the following address: 6 Tzanakaki Street, Chania, GR-73134, Greece. Attn: Elena Digenaki.

We will respond to all such requests within 30 days of our receipt of the request, unless there are extenuating circumstances, in which event we may take up to 60 days to respond. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal data may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity. We may charge you a reasonable fee for subsequent copies of data that you request.

If you have any questions about our practices concerning your personal data or the exercise of your rights, you may either contact the Company at info@biobeach.gr or the supervisory authority in the Member State of your residence.

Right to Withdraw Consent: You have the right to withdraw your consent to any processing that we conduct solely based on your consent (such as sending direct marketing materials to your personal email account). You may withdraw your consent to marketing activities and all other activities for which you have granted consent by contacting us at info@biobeach.gr.