

PRIVACY POLICY

Last updated: 28-10-2024

The **protection of your Personal Data** is our primary concern and for that reason the **collection and the processing of the Personal Data** is carried out according to the provisions of the **General Regulation of Data Protection [2016/679/EU]** and the applicable Greek legislation. We attribute great importance to the legal processing, to the security and protection of your personal data, when you communicate or co-operate with us.

The **Privacy Policy** of the Website of the **International Chain of Hotels: «Brown Hotels» in Greece** is in agreement and compliant with the **European Data Protection Regulation 2016/679/EU (GDPR)** and Greek legislation.

We apply with our trained personnel, regarding the processing of your personal data, all the principles defined in GDPR, i.e. lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitations, integrity, confidentiality, accountability.

Please read the **Privacy Policy** carefully and if you accept its (Privacy Policy) terms and conditions, then use our website.

In case you do not agree with the Privacy Policy, do not use our website and do not provide your personal data.

I. DATA CONTROLLER OF PERSONAL DATA

Data Controller of your Personal Data is the **private company under the trade name: “BHE GREECE SINGLE MEMBER P.C.”**, located in Athens, at 58, Eleftheriou Venizelou [ex Panepistimiou] Street, with no of General Commercial Registry : 150429701000 and TIN: 801158405 and with website: <https://brownhotels.com/>, **a company that manages the Hotels of the International Chain of Hotels: “Brown Hotels” in Greece.**

II. WHAT PERSONAL DATA WE COLLECT ABOUT YOU

1. You provide us and we collect respectively and process legally, according to the applicable legislation and we protect your absolutely necessary personal data:
 - ❖ in order you to book a room at one of the **Hotels of the International Chain of Hotels: “Brown Hotels” in Greece,**
 - ❖ in order you to make **use of our services,**
 - ❖ in order you to **receive information about our newsletters,**
 - ❖ in order to **take part in contests,** etc.
 - ❖ for the analysis of the visiting of our website and in order to provide you with information regarding our services, special offers and promotional actions.

2. The personal data, which you provide us, we collect respectively and we process them according to the applicable legislation, **are the absolute necessary for the fulfillment of our business aims** and activities. The personal data, which we collect, are the following, i.e.:

- ❖ Your full name.
- ❖ Your address, including city and country [upon your arrival at the Hotel].
- ❖ Your e - mail address.
- ❖ Your phone number.
- ❖ Date of birth [upon your arrival at the Hotel].
- ❖ Nationality.
- ❖ Language preference.
- ❖ Your credit card details.
- ❖ Optional information (e.g., if you will bring pets, etc.).
- ❖ The reservation dates of the rooms.
- ❖ Number of rooms in the reservation.
- ❖ Number of people in the reservation (adults and children).
- ❖ The selected price / special offer.
- ❖ Arrival information.
- ❖ Room, bed type and/or other preferences

3. It is mentioned that you provide and we collect respectively your “**sensitive**” **personal data – personal data of special categories**, only if it is **required by the law and for the provision of specific services from us** [e.g. personal data of health regarding sport services, services for body and face etc]. For that reason you are kindly asked **not to send us “sensitive” personal data – personal data of special categories**, unless if you are asked for and if there is a specific reason.

4. We legally process your abovementioned personal data in order to **confirm your reservation** at one of the **Hotels of the International Chain of Hotels: “Brown Hotels” in Greece**, for the conclusion and execution/enforcement of our contract with you and for the proper provision on our part of services to you, for the fulfilment of our contractual obligations to you, for the fulfilment of our obligations, derived from the law, for our compliance with court decisions and decisions of administrative authorities, for the safeguarding of our legal interests, both our own, as well as your own, as well as for sending newsletters, for advertising and promotional purposes (marketing) of the services provided, for your participation in competitions.

5. Our site uses cookies, such as Google Analytics (_ga, _gid), Facebook (_fbp), and Vimeo (vuid), for tracking and marketing purposes. For EU users, cookies are installed only after obtaining prior consent. A consent management platform (CMP) is displayed to manage non-essential cookies in compliance with GDPR (Rec. 30, 32).»

We collect data cookies in order to enhance users experience, to measure the interactions, to personalize the ads and to optimize our services. Cookies are used exclusively with your consent, as user, in accordance with GDPR guidelines.

When you visit our website, we may collect information via Google Analytics or your web hosting server about the pages you have accessed or visited, as well as information about the use of our website, for example, the pages you viewed, the website from which you came to our website or this link, the changes you made to the information you gave us and your transactions, including the use of cookies.

6. Please inform us in written and in particular on time in case that the personal data, that you have provided to us, have been changed.

III. PURPOSE OF PROCESSING PERSONAL DATA OR INFORMATION

You provide us and we collect respectively and we use your absolutely necessary personal data for the following legal purposes of processing data [according to the article 6 of GDPR] per case, either for the execution of the pre-contractual relation with you, either for the execution of the contract, either for serving our legal interests, either with your explicit consent, which you can withdraw/revoke any time, either for the defense of your vital interest, i.e.:

A. To proceed to **your required identification for the confirmation of your reservation** and for its general management, provided that the processing is necessary for the execution of your reservation request or your direct reservation at one of the **Hotels of the International Chain of Hotels: “Brown Hotels” in Greece** for the provision of our services.

B. To **understand your preferences**, so that we can adapt our services to your needs and preferences and that your stay in one of the **Hotels of the International Chain of Hotels: “Brown Hotels” in Greece** is pleasant.

C. For the pre-contractual relation with you, for the **conclusion and execution of a contract with you**, for the proper fulfilment of our contractual obligations towards you, as well as for the provision of services to you.

D. For the **fulfilment of our legal and tax obligations and our compliance with our obligations**, which derive from the law (labour and insurance legislation), as well as in the execution of decisions of courts and administrative authorities and regulatory provisions.

E. To safeguard and protect our legal interests, both yours and ours.

F. To send you newsletters and to inform you when it is required about anything related to the **Hotels of the International Chain of Hotels: “Brown Hotels” in Greece** and our services.

G. To inform you about **offers, for promoting actions and for you to participate in competitions**, if you wish.

H. To protect our **legal interests and for the protection of people and goods** with the establishment of the system of **video surveillance**.

NOTE:

1. Access to your personal data have **our employees, in the frame of execution of their duties**, which are related to the execution of contracts, being concluded with you, for the satisfaction of your requests. Our employees are bound with **clause of confidentiality and protection of personal data** and they treat the information, that they receive, as confidential.

2. Your personal data may be disclosed to third parties, without your prior consent, in the context of fulfilling our legal obligations, as well as upon the request and order of the Judicial, Prosecution, Tax, Supervisory and Public Authorities in general, as well as for the protection and security of our property and to investigate any offenses and for the defense any kind of crime.

3. Furthermore, it is possible for personal data to be transmitted to third parties [e.g. external associates, lawyers etc), as data processors to whom we have assigned with a special contract the processing of your personal data on our behalf, defining specifically the purpose and the bounds of processing.

4. Your personal data may also be transmitted and in other countries, including and countries outside the European Union (for example Israel), based in adequacy decisions of EU, corporate binding rules, by taking all the required security measures and provided that there is a legal reason [e.g. execution of contract etc].

5. Your personal data may be shared with third -party providers as Google, Facebook and Vimeo.

Data use by these providers is governed by their privacy policies, accessible via links in our cookie consent banner.

Please find the link of the privacy policy of Google, regarding how it uses the data:

<https://business.safety.google/privacy/>

Please find the link of the private policy by Vimeo, regarding how it uses the data:

<https://vimeo.com/privacy>

Please find the link of the privacy policy of Facebook, regarding how it uses the data:

https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0

IV. YOUR PERSONAL DATA STORING TIME PERIOD

We will ask you for your absolute necessary personal data in order to provide our services to you, in order to connect you with our website, in order you to take part in promotions and contests.

We keep your personal data only for the period of time, which is necessary for the purposes of processing your personal data, for the fulfillment of our legal and tax obligations and in general for as long as the applicable legislation requires.

We keep your personal data only for the period of time, which is necessary for the execution of a contract, as and for the necessary time after the termination of the contractual relation between us, for the exercise of our legal claims and for the protection and the defense of legal interests and for the prosecution of illegal actions.

In cases where we process personal data for the purposes of advertising, sending newsletters, with your consent, we process the data until you withdraw our consent and for a short time period after that (to allow us to implement your requests).

V. POLICY OF COOKIES

Our website accepts the use of cookies. These are online tools for collecting and analyzing information, deriving from social networking platforms or collaborating websites of third parties, in order to measure/count visiting, improve the operation, the content of our website, in order to adapt it to the needs of our customers.

Our website use cookies, as Google Analytics (_ga, _gid), Facebook (_fbp) and Vimeo (vuid) for monitoring and marketing purposes. For the users of EU, cookies are only installed after obtaining prior consent. A consent management platform [CMR] is displayed to manage non – essential cookies in compliance with the GDPR [No 30,32].

Google will use your personal data, when you grant your consent to our website.

If you do not wish third parties, as google, facebook etc to receive information from the your navigation section, when you visit our website, you can either withdraw our consent [regarding the users of EU], or to request to opt out of the terms provided by such third party's usage policy on the website.

You can change the settings on your computer by choosing not to accept cookies or being asked to accept each of them separately.

VI. DISPLAY OF ADVERTISEMENTS

If you have given explicit consent, it we may also use other information that we have collected after human intervention by our commercial department in order to display advertisements relevant to your preferences on our website.

We do not use tools of detecting evaluation of your consumer profile and your preferences in general with other personal information.

NOTE: Our website may contain links to other websites that are not operated by us. If you click on a third party link, you will be directed to that third party's website. We strongly advise you to check the Privacy Policy of each website you visit.

We do not check and we do not undertake any responsibility for the content, the privacy policies or practices of any sites or services of third.

VII. YOUR RIGHTS UNDER GDPR [2016/679/EU]

Your rights regarding the **processing of your Personal Data** by the company: “**BHE GREECE SINGLE MEMBER PC**”, according to the **General Regulation on the Protection of Personal Data**, are the following, namely:

1. **Right of Access to your Personal Data**, giving you the right to request a copy of your personal data, which we hold.
2. **Right to update the Personal Data** we hold.
3. **Right to Correct Your Personal Data**, in case there is any inaccurate information about you. If you want us to correct and at the same time update your personal data, please contact our company and provide us with updated information.
4. **Right to Portability**. You have the right to request that we provide you with your personal data, which we hold in a structured, commonly used, machine-readable format, or ask us to send you your personal data structured in another database format.
5. **Right to Restrict the Processing of your Personal Data**.
6. **Right to Withdraw consent granted to us**. You have the right to withdraw your consent granted to us for the processing of your Personal data at any time by contacting our company. You have the right to withdraw your consent for cookies or use of data any time towards the cookie banner settings, available on our website.
7. **Right to Deletion of your Personal Data**, stating at the same time the reasons for which you wish for the relevant deletion.
8. **Right to File a Complaint with the competent supervisory authority**. The competent authority is the Data Protection Authority, which is based in Athens, on 1-3, Kifisias Avenue , P.C. 11523. Contact numbers are 30-210 6475600, Fax: + 30-210 6475628, E-mail: contact@dpa.gr.
9. **Right to prohibit**: If you wish to object to the processing of your personal data, which takes place through the use of this website, please contact us.

VIII. MEASURES FOR PERSONAL DATA AND INFORMATION **STORAGE SECURITY**

The **security** of your personal data is our primary concern. We process your personal data lawfully and with care, taking all necessary and appropriate technical and organizational measures, in order to secure the confidentiality, accuracy and availability of your data and to keep your personal data secure once it reaches our systems and database. We apply best practices for data collection, storage and processing and security measures to protect against unauthorized access, modification, disclosure or destruction of your personal data and data stored on our website or database. We keep your personal data in a safe place by using encryption, security and protection software.

Due to the risks from using the internet, by using our website and accepting this privacy policy you accept and the possible risks – which are unrelated/independent to us – of any breach of your personal data and our electronic transactions, from malicious actions of third parties, for which we bear no responsibility.

IX. AMENDMENT OF THE PRIVACY POLICY

We reserve the right to amend this policy by implementing the new provisions of EU and Greek legislation and at our discretion. If we make any changes, we will record these changes here so that you can have immediate access. Please monitor and review it regularly for any amendment of the present policy in the future.

X. METHODS OF CONTACTING OUR COMPANY ABOUT YOUR PERSONAL DATA

For any question or clarification regarding this Privacy Policy or and the use of your personal data, as well as for the exercise of your rights, please contact us at the email address of our **Data Protection Officer**: dpo.greece@brownhotels.com (Mrs. Afroditi Th. Makedona, Attorney at Law, Associate of the Law Firm: "ELEFThERIOU & ASSOCIATES LAW FIRM).