

## PRIVACY & COOKIES POLICY

### Scope of This Policy

This Privacy Policy shall be applicable to Sani Resort's free mobile application named SANI RESORT (hereinafter the "**Mobile Application**"), created and developed by M-HOSPITALITY (H+S Technology Solutions S.A.) on behalf of "SANI DEVELOPMENT AND TOURISTIC S.A." (Sani S.A), a company incorporated under the laws of Greece ("*Société Anonyme*") with registered seat at 55, Nikolaou Plastira Thessaloniki, Greece (hereinafter the "**Sani Resort**", "**Sani**" "**we**", "**us**" or "**our**").

At Sani Resort, we guarantee our commitment to respecting and protecting your privacy, as well as safeguarding your personal data. Our vision and goal are the provision of services that exceed your highest expectations. Therefore, SANI with respect to the applicable national and European legal framework about data protection, especially the new European General Data Protection Regulation 2016/679 (GDPR) provides you hereby a lawful, fair and transparent policy in order to inform you about the personal data we collect, how we use it, and how the use of this information can benefit your experience while using the Mobile Application.

We are dedicated to achieving transparency of the collection and use to your personal data; therefore, we wish to provide you via this Privacy and Cookies Policy with information about:

- what personal data we collect and how we use them;
- the purposes we process your personal data and the relevant legal basis under which we process your personal data;
- your rights related to your personal data.

This Privacy and Cookies Policy aims to transparently inform you on the processing of your personal data; however, it may not include all our processing activities as these constantly evolve. In case that a new processing activity is added, we shall endeavor to update this Privacy and Cookies Policy, and, in any case, we will provide you with the necessary information before you provide us with your data.

You can always find out more by contacting our Data Protection Officer at the contact details, as further described below (Your Rights).

For Your better information, this Policy is developed in two parts; The First part (I) concerns the **Privacy Policy** and the Second part (II) refers to the **Cookies Policy**, which both govern the Mobile Application.

## I. PRIVACY POLICY

### **What Personal Data we collect and how we use them**

#### **A. Data collected for signing up to the Mobile Application**

After downloading and signing up in our Mobile Application, you will be asked to provide your first name, last name, email address, password and other registration information such as mobile number, hotel or resort preference, prefix, gender, country of origin, date of birth and nationality.

We do not collect any of your personal data if you only download and navigate in our Mobile Application except for requests or information, you voluntarily submit to us, via the relevant communication forms.

##### **A.1. Purposes of processing – legal basis**

We collect your signing-up data in order to make available to you all the features included in the Mobile Application. Our legal basis is your prior consent.

#### **B. Data collected for booking purposes**

If you decide to make a booking reservation through our Mobile Application, you will be redirected to the bookings online platform, where you will be asked to provide your name and surname, address, city, country, telephone, email, any special requests you may have, your credit card details (card type, card number, secure code, expiration date, card owner), arrival date and departure date as well as flight details in case of a transfer request.

In this case, we receive an email confirming your booking, including information such as your name and surname, country, arrival date and departure date, flight details in case of transfer, any (family) members that will accompany you, any special requests (i.e. requirement for transportation, declaration of special preferences and/or allergies that we should be aware of).

##### **B.1. Purposes of processing – legal basis**

We collect your booking data in order to:

- Process and complete your booking reservation:
  - Process the payment of the relevant services, fees and charges. Our legal basis is that processing is necessary for the performance of a contract with you.
  - Collect and recover money owed to us. Our legal basis is our legitimate interest.
  - Process your details in case of disputes. Our legal basis is our legitimate interest.
  
- Facilitate your booking and organize airport transfer, if you make a request for that. Our legal basis is that processing is necessary for the performance of a contract with you.

### **C. Activities requests**

Whether you stay or you are a visitor at Sani Resort premises, you can use the Mobile Application in order to send us requests on various activities concerning dinner reservations, spa & fitness activities, outdoor activities and activities for children and teens.

#### **Submitting activity request:**

When you choose to submit a request, you will be redirected to the Email Service Provider of your choice and your request will be sent to our relevant email address.

In most activities, your data remains within SANI since the requested activities are rendered by our staff.

However, in some cases, depending on your request, necessary information is forwarded to the provider of the selected activity which might be a third-party associate, in order to better serve you.

#### **World Wide Kids Activities:**

World Wide Kids is a childcare expert for the hospitality and leisure industry. Worldwide Kids' goal is to aid our guests in providing the highest standards of childcare for children of all ages. Therefore, we have assigned World Wide Kids to handle our Kids' Clubs. They are responsible for the whole operation of the kids' club including the processing of personal data, therefore they act as the Data Controllers. We only receive personal information for specific processing activities for which we act as Data Processors on their behalf. You can learn more about World Wide Kid's Privacy Policy at the following link: <https://www.worldwide-kids.com/privacy-policy/>.

In any case, you submit a specific request to book an activity via the Mobile Application for World Wide Kids Activities, the declared data will be submitted directly to World Wide Kids. If you wish to express a request regarding relevant personal data, you can always address to our DPO (contact details below) as well and we will forward your request to World Wide Kids.

#### Allergies/Special Preferences Declaration:

Allergies and special preferences which may constitute in some cases sensitive personal data. We may collect such data only if you voluntarily provide us, or when we ask you to do so and you provide us your explicit consent.

In case you share with us your allergies or other special preferences, in order to register this information in our systems and inform the relevant departments during your stay or visit in our premises, we will ask you to provide us your consent to keep this data and subsequently inform adequately our a la carte restaurants and/or housekeeping department for your safety, convenience and esteemed personalized services.

#### **C.1. Purposes of processing – legal basis**

We collect your requests in order to facilitate, organize, process and complete your request per activity. Our legal basis is either the performance of a contract with you (if you are resident) or our legitimate interest (if you are visitor).

In case you share with us your allergies or other special preferences, our legal basis is your previous explicit consent.

#### **Special Categories of Personal Data – Sensitive Personal Data**

When referring to the notions of “special categories of personal data” or “sensitive personal data”, they reflect the kind of personal information that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and genetic data, biometric data which allows to uniquely identify a natural person, health data and/or data regarding sexual orientation. We may collect such data only if you voluntarily provide us, or when we ask you to do so and you provide us your explicit consent.

#### **Minors Data**

We do not seek or obtain personal data directly from minors (i.e. under the age of 18), instead we endeavor to collect such data from their legal guardian and when necessary we obtain relevant consent. However, as it is impossible to always determine the age of persons who

access and use our websites, we encourage parents or guardians to contact us if they notice any case of unauthorized data provision by minors in order to exercise accordingly their rights such as deletion of their data.

### **Transfer of Personal Data**

The personal information you provide us is being kept secured and safeguarded. We may share your information within our group - companies and public services for the above described purposes.

Furthermore, we may disclose your personal data to third parties (legal entities or individuals) which process your personal data under our written order and clarifications (Data Processors). We always guarantee that these third parties imply the same measures for the protection of your personal data and act only under our written orders with respect to your personal data.

More specifically, in the context of pursuance of the processing purposes, personal data may be transferred to:

- Third companies which provide us relevant services (e.g. hosting services, finance, legal or technical support, payroll, etc). In any case, all these companies are contractually bound with us in order to ensure the observance of confidentiality, as well as commitment to the data protection legislation.
- Companies in our Group, to the extent that this transfer is necessary for the pursuance of our purposes.
- Public authorities (Police, prosecuting authorities, tax authorities etc.) in the context of issuance of fines, or upon relevant request.

When information is transferred as afore-mentioned, we limit the extend of information that is being disclosed, to the strictly necessary for the performance of the specific purpose. In addition, given that some of our activities are processed by third-parties, we endeavor to ensure by contractual assurances that personal data processing is secure and fully compatible with this privacy policy.

When the transfer of data concerns a country outside the European Union (EU) or the European Economic Area (EEA), we always check whether:

- The Commission has issued an adequacy decision on the third country to which the transfer is addressed to.

- Appropriate safeguards are in place in accordance with the Regulation for the transfer of such data.

In any other case, the transfer to a third country is not allowed and we may not transfer personal data unless any of the specific derogations provided for in the Regulation apply (e.g. explicit consent of the data subject, upon informing him/her on the risks of the transfer, the transfer is necessary for the performance of a contract at the request of the subject, there are reasons of public interest, it is necessary to support the legal claims and the vital interests of the subject etc.).

#### **Third-Party Websites' Disclaimer**

By using the Mobile Application, you may be redirected to third-party websites; SANI S.A. does not control third-party websites and is not responsible for the content of any linked-to third-party websites or any hyperlink in a linked-to website. We are not responsible for the privacy practices or the content of third-party websites.

#### **Your Rights**

At SANI S.A., we endeavor to protect and respect your rights, as set forth by General Data Protection Regulation, including more specifically:

- (i) your right to be informed on the processing of your personal information (i.e. right of access) and to request and obtain further information on the processing applied;
- (ii) your right to request for correction of their inaccurate personal data;
- (iii) your right to request for deletion of personal information provided, unless prohibited by legitimate reasons;
- (iv) your right to request for limitation of processing;
- (v) your right to request for portability of your personal information; and
- (vi) your right to objection/opposition to further processing thereof.

In these cases, SANI will respond in writing within 30 days upon receipt and identification of the request.

In addition, in the event of exercising one or more of the above-mentioned rights of correction, deletion and restriction of your data, these requests shall also be forwarded to any

third-party recipient to whom the personal information may have been disclosed in the scope of pursuance of the aforementioned processing purposes.

#### **Data Protection Officer**

In order to ensure that your personal information is being efficiently protected, SANI S.A. has appointed a Data Protection Officer to whom data subjects may address their requests and questions in relation to this privacy policy, as follows:

SANI RESORT,

Halkidiki, Greece, 630 77 Kassandra

Tel: +30 23740 99789,

Email: [privacy@saniresort.gr](mailto:privacy@saniresort.gr)

In case you consider that we have not properly responded to your request, you can always contact the relevant Greek Data Protection Authority ([www.dpa.gr](http://www.dpa.gr)).

#### **Information Security**

Although, no method of transmission over the Internet or method of electronic storage is 100 percent secure, at SANI we have taken all commercially reasonable measures and precautions in order to maintain your data accuracy and to ensure the appropriate use of information we collect about you, as well as to secure and protect your personal information from unauthorized access, while you enjoy products and services we provide you during your physical presence in our premises or your digital visits in our online environment, respectively.

#### **Retention Period of Personal Data**

Your personal data is retained for a predetermined and limited period depending on the purpose of processing, after the end of which, these personal data is being deleted from our files unless another retention period is required or permitted by applicable law.

#### **Updates to the Privacy Policy**

SANI may amend this Privacy Policy from time to time in order to meet changes in the regulatory environment, business needs, or to satisfy the needs of our guests, properties, strategic marketing partners, and service providers. Updated versions will be uploaded to our website and date stamped so that you are always aware of when our Privacy Policy was last updated.

Privacy Policy Revised: April 2019

## II. COOKIES POLICY

The following cookies policy applies to the Mobile Application; therefore, we wish to provide you with all necessary information for the use of cookies through our website.

### **What are cookies?**

A cookie is a small text file saved on your mobile device (phones, tablets, etc) when you use the Mobile Application. It enables us to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you use the Mobile Application. Cookies help you navigate in a more user-friendly environment.

Depending on their lifespan, cookies are divided into two main categories:

#### Session Cookies.

These types of Cookies are stored only temporarily during the use of the Mobile Application, and are deleted from your device when you close it. We use Session Cookies to support the functionality of the Mobile Application, as well as to understand its use.

#### Persistent Cookies:

These types of Cookies are not deleted when you close the Mobile Application, but are saved on your device for a fixed period of time or until deleted.

### **How do we use cookies?**

Each type of cookie we use serves different purposes. When you use the Mobile Application, we may use the following cookies:

- Essential Cookies

These cookies are essential in order to enable you to move around the Mobile Application and its features. Without these cookies, services you have asked for, cannot be provided. Generally, these are session cookies that expire after closing the Mobile Application.

#### **The website uses the following essential cookies:**



Type of cookie	Name	Purpose	Lifespan
Session	_mh3.m-hospb2b.com	App operation	30 min

- *Analytics Cookies*

These types of cookies collect information about your use of the Mobile Application and enable us to improve the way it works. These Cookies give us aggregated information that we use to monitor the Mobile Application's performance, count visits, spot technical errors and/or bugs etc.

**The website uses the following analytics cookies:**

Type of cookie	Name	Purpose	Lifespan
Google analytics	_ga	Analytics	2 years

**How you can disable cookies?**

If you want to disable cookies, according to their specific type -and especially essential cookies-, the Mobile Application may not operate properly.

If you wish to modify the privacy settings, follow the instructions specified by your mobile device's browser developer.

Below, there are some links that will lead you to pages where you can learn how to modify the privacy settings of your mobile device:

Mozilla Firefox:

- iOS: <https://support.mozilla.org/en-US/kb/clear-browsing-history-firefox-ios>
- Android: <https://support.mozilla.org/en-US/kb/enable-or-disable-cookies-firefox-android>

Chrome Mobile:

- iOS: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DiOS&hl=en&oco=1>

- Android: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en&oco=1>

Safari:

- iOS: <https://support.apple.com/en-gb/HT201265>

Google Analytics Opt-out: <https://tools.google.com/dlpage/gaoptout>

### **Updates to the Cookies Policy**

SANI may amend this Cookies Policy from time to time in order to meet changes in the regulatory environment, business needs, or to satisfy the needs of our guests, properties, strategic marketing partners, and service providers. Updated versions will be uploaded to Play Store and/or Apple Store and date stamped so that you are always aware of when our Cookies Policy was last updated.

Cookies Policy Revised: April 2019