

## PRIVACY NOTICE



LINDOS  
AQUA TERRA  
*beachfront living & leisure*

### Summary

We respect your right to privacy and treat the personal data you give to us with care and we act according to the European Regulation 2016/679 (GDPR) for the protection of the personal data and the Greek Legislation. This Privacy Policy describes how we collect, use, share, store or otherwise process the information we hold about you. We are committed to ensuring the personal data you provide is used for the purpose it was collected and is kept secure.

We encourage you to read this Privacy Notice carefully when using our website or services or transacting business with us. By accepting this Privacy Notice you are informed and you provide your free, informed, specific and unambiguous consent for the personal data you provide on the website at <https://lindosaquaterra.gr/>

Your personal information allows us to provide the products and services you have asked for, as well as enabling us to improve those products and services by understanding your interests and preferences.

Please note that Lindos Aqua Terra is the Data Controller of the personal data you provide us through our website <https://lindosaquaterra.gr/>

The principles set out in this Privacy Notice apply to all instances in which Lindos Aqua Terra Hotel receives your personal data as a Data Controller for the purposes described in this notice. Those purposes are processing of data in order to participate in the various activities available on this website or as mentioned below.

If you have any questions about our privacy practices, please refer to the end of this Privacy Notice for information on how to contact us.

### **Lindos Aqua Terra**

85107 Vlichia Beach Lindos, Rhodes, Greece

Tel.: +30 22440 31605

Email: [info@lindosaquaterra.gr](mailto:info@lindosaquaterra.gr)

#### **What information do we collect?**

Lindos Aqua Terra Hotel is the only Data controller of these data. The term “**personal information or personal data**” in this Policy refers to information that identifies or is capable of identifying you as an individual.

We do not sell, rent or otherwise disclose personal information collected by us to third parties in the ordinary course of business. The use of information collected through our website shall be limited to the purpose of providing the service for which you have engaged us.

When you interact with our products and services, for example when browsing our website or booking a hotel room or you filling in any contact form, we collect information about you and that particular interaction.

Generally, the types of personal data that we process may include:

1. Data provided by users for **making reservations, both through our website, the call center, the contact form on our website and emails for room bookings and combined packages (airline tickets and room bookings):**

- name, surname,
- email address,
- credit card details (name/surname of the holder, card number, expiration data and security code)
- arrival time and other requests
- dietary and other requests
- Allergies

Data the user provides on a voluntary basis:

- country
- telephone number
- company
- address (name, number)
- purpose of stay
- city/location
- state/region
- postal code
- comments

2. Data provided by users for **changing or cancelling their reservations:**

- name, surname
- email address and/or telephone number.
- credit card details (name/surname of the holder, card number, expiration data and security code)

3. Data provided using our **contact form** for general inquiries:

- name, surname
- email address
- telephone number

Data the user provides on a voluntary basis:

- Address
- city, Zip Code, Country
- their message

4. Data provided by users for **our wedding or other related services:**

- name, surname
- date of birth
- nationality
- Address, city, Zip Code, country
- email address,
- Telephone Number
- Mobile number
- other info and certificates for wedding authorisation
- event photographs and video footage

#### 5. Data provided for **our wedding/event Guestbook of comments**:

- name,
- email address,
- comment

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

When referring to the notions of “special categories of personal data” or “sensitive personal data”, it means that this kind of personal information reveals 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. At Lindos Aqua Terra Hotel, we do not collect sensitive personal data, unless you provide us them along with an explicit consent for every related purpose of processing. Such a case is when we ask you to provide us or you voluntarily provide us with information about your health (i.e. allergies), in order to be able to offer you the best gastronomic services in relation with your health status. This information is stored securely with restricted access and handled the greatest respect for your privacy. Where you provide information to us about other people, you need to make sure you have their permission to do so or that you can speak on their behalf, for example, in the case of children.

#### **What is the purpose of collecting such personal information?**

The justification for processing your personal data will be as follows:

1. for **making reservations, both through our website, the call center the contact form on our website and emails for room bookings and combined packages (airline tickets and room bookings)**: performance of the contract between the parties. The use of the Website, is to provide an online booking service (room or flight) to its users (legitimate interest of Lindos Aqua Terra Hotel)
2. for **changing or cancelling their reservations**: the performance of the contract between the parties. The use of the Website, is to provide its users with the opportunity to amend or cancel their bookings (legitimate interest of Lindos Aqua Terra Hotel).
3. for communicating with us using the **contact form**: the use of this contact form is to allow the communication with our clients and answer to their inquiries and provide them information about Lindos Aqua Terra Hotel (pre-contract negotiations or/and legitimate interest of Lindos Aqua Terra Hotel).

4. For **organizing weddings** and other events for our guests. We use your email to communicate with you about your chosen service and to manage our customer relationship with you. The information you provide is used to process transactions, send emails for the smooth running of the service you have chosen, and to improve the service we provide. (contract and/or legitimate interest of Lindos Aqua Terra Hotel)
5. for **our wedding/event Guestbook of comments**: the purpose of this Guestbook of comments is to share our guests' experience with us and provide us with feedback during their stay and their wedding day (legitimate interest of Lindos Aqua Terra Hotel)

### How we keep your personal data secure

We take all the necessary precautions, security measures as well as the relevant technical and organizational measures to ensure the confidentiality of the provided personal data. We have secure systems and processes in place to ensure the personal information you provide us is kept safe. We store personal information on our secure electronic systems. We can assure you that we take all reasonable steps to ensure your data is handled securely under appropriate agreements with our suppliers.

### Minors Data

Information about minors obtained from parents or guardians.

Lindos Aqua Terra Hotel does not knowingly collect personally identifiable information via our websites from any person we actually know is a person under the age of 18. We may collect personally identifiable information from persons under the age of 18 as part of the guest reservation and registration processes, but always with the consent of such person's parent or guardian.

Our clients should respect our data protection rules and should not submit photos or information about children or any third parties without their consent (or their parent's consent in the case of a child under 13 years of age). Children under 13 may not submit photos or other materials.

### How we collect personal data

We may collect personal information from a variety of sources, including:

**Directly from you or someone acting on your behalf:** Information obtained from someone making a booking on your behalf. If you are entering data on behalf of another person, you warrant to us that you are authorised by that person to enter

their personal data into our system, and that information you enter is accurate and correct. If any non-compliance by you with respect to this provision results in any loss or damage being incurred by us, you may be required to compensate us in respect of such loss.

**Through our services:** We may collect personal information about you when you use our services, for example, when you make a room booking.

**From third parties:** Information about you obtained from third party sources (tour operators etc). These third party sources may include credit reference agencies and other third parties. In addition, in preparation for your stay, we may collect your photograph from publically available sources so that we can recognise you in order to provide you with outstanding customer service.

### How we use the data we collect from this website?

We always base the processing of your personal data to a valid legal basis such as law, contract or your explicit consent etc.

We need your personal data in order to:

a. Comply with legal obligations:

- verify your identity
- Monitor the use of our products and services and content
- Facilitate administration and marketing purposes including analyzing your travel and accommodation preferences, as well as communication purposes in relation to our products and services our strategic marketing partners, and other trusted third parties (ELSTAT)
- comply with general legal obligations on us
- Keep guests safe and ensure the security of our hotels
- Ensure the acceptable use of our services
- Facilitate payments and credit checks (i.e. completing a reservation, billing purposes etc)
- Investigate and respond to disputes
- Send you product or service related communications, service messages (Law 3471/2006)

b. Enter a contract or fulfill the hospitality contract we have with you:

- Provide you with help and support where it may be required. For example, we may contact you to provide assistance if experience technical difficulties, where we have your contact details
- Provide you with the products and services you have requested, including administering your booking, amend it or cancel it, responding to any enquiries, complaints or requests you may have
- Verify your identity and your credit card details.
- Process a transaction (i.e. completing a reservation, responding to a request for information etc)
- Send you product or service related communications, service messages
- Provide you with the requested wedding/event planning services.

c. Promote the legitimate interests of Lindos Aqua Terra Hotel:

- In order to help you enter a contract with us or to fulfill the hospitality contract we already have between us. (Verify your identity, provide you with the products and services you have requested, including administering your booking, amend it or cancel it, responding to any enquiries, complaints or requests you may have)
- Improve our services as well as promote questionnaires or surveys in order to provide you personalized offers about our products and services;
- Make decisions about what direct marketing to show you based on how you have interacted with us
- Monitor the use of our products and services and content
- Improve our products and services online and offline, including our websites and apps
- Comply with legal obligations on us
- Keep guests safe and ensure the security of our hotels
- Ensure the acceptable use of our services
- Facilitate payments, credit checks and ensure by any means that it will not be any abusive challenges of the transaction.
- Provide you with the requested wedding/event planning service and client's feedback
- Improve the efficiency of our websites and our various means of communications, facilitate our advertising campaigns, and/or promotional activities

**However, for certain activities we may also need your explicit consent to process your data (i.e. storing info about your allergies). Where the consent is needed for the processing it is clearly mentioned in this Privacy Notice.**

#### **Withdrawing consent or otherwise objecting to direct marketing/profiling**

In addition to sending you information about the products and services you use (product communications) and in-life communications while you stay with us, where we have your permission or where we are relying on our legitimate interest, we may send you direct marketing communications about our products, services, events and offers.

Direct marketing communications may be sent by post, email, telephone, SMS and MMS, through social media (such as Whatsapp, Instagram, Twitter, and Facebook), messages including push notifications to your mobile devices, and via other electronic means such as when you visit our websites or use our apps. This may also include any websites and apps of our partners who are in our advertising networks.

We may send you direct marketing while you have an ongoing relationship with us and for a reasonable time after you have used one of our products or services where we feel we have a legitimate interest.

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. You have an absolute right to opt-out of direct marketing, or profiling we may carry out for direct marketing, at any time. You can do this by contacting us using the details set out in the end of this Privacy Notice.

#### **How long do we keep your personal data?**

We will retain your information for as long as necessary for the uses set out in this Notice or while there is a legitimate business reason for doing so. If you ask us to delete your information before this time, we may not be able to do so for technical, legal, regulatory or contractual constraints. Your information will be retained in order to comply with legal and regulatory obligations as well as for analysis, to prevent fraud, collect any monies owed, and to resolve disputes.

#### **More specifically,**

**1. for making reservations, both through our website, the call center, the contact form on our website and emails for room bookings and combined packages**



**(airline tickets and room bookings):** the data will be stored throughout the contractual relationship, and after termination of the same, for the limitation period for legal actions that could result from it.

2. for **changing or cancelling their reservations:** will be stored throughout the contractual relationship, and after termination of the same, for the limitation period for legal actions that could result from it.

3. **for communicating with us using our contact form:** the data you provide us through this communication will be kept only for the purpose of managing your inquiries or answering your questions. After the termination of our communication these data will be permanently deleted. In case this communication is for the purpose of a room booking with us we will keep this information in order to fulfill our contractual obligations (see above no.1)

4. **for wedding and event planning:** this data will be stored throughout the contractual relationship. After the fulfillment of our event planning contract, we will return all the documentation we have (if any) to you and we will not store any record of it (except from bills, receipts of payment etc. for tax purposes).

## Your rights

As a data subject, you have a number of rights. You can:

**a)** access your personal data stored at any time. You can also ask for free copy of this information. Furthermore, the data subject can have access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;

- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

**b)** require us to rectify, inaccurate, incorrect or incomplete data; **(right to rectification)**

**c)** obtain from us the erasure or the limitation of the data processing, in certain situations, for example where the data is no longer necessary for the purposes of processing; **(right to erasure and the right to restriction of processing)**

**d)** receive your Personal Information, which you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that data to another entity without limitation. **(right to data portability)**

**e)** object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing. **(right to object)**

**f)** If you believe that the organisation has not complied with your data protection rights, you can file a complaint to the Greek Data Protection Authority ([http://www.dpa.gr/portal/page?\\_pageid=33,15048&\\_dad=portal&\\_schema=PORTAL](http://www.dpa.gr/portal/page?_pageid=33,15048&_dad=portal&_schema=PORTAL))

We rely on you to ensure that your personal data is complete, accurate and current. Please do inform us promptly of any changes to or inaccuracies of to your personal data by contacting us.

Where we base our data processing on our legitimate interest or the public interest, you have the right to object at any time to that use of your personal data subject to applicable law.

For any of your requests in regards to this Privacy Policy and to exercise any of your rights or if you have a complaint, please contact us at [info@lindosaquaterra.gr](mailto:info@lindosaquaterra.gr)

We are entitled to refuse a data access request from you where (i) such request is manifestly unfounded or excessive, in particular because of its repetitive character (in this case, if we decide to provide you with the personal data requested, we may charge you a reasonable fee to account for administrative costs of doing so), or (ii) we are entitled to do so pursuant to data protection legislation.

**To access what personal data is held, identification will be required (see below).**

## Disclosure of your personal data

In some cases we may be required to disclose your personal information to comply with legal requirements and requests from government agencies if required for the purposes set out above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Your information will only be shared and used in accordance with this Notice and where an agreement is in place to ensure that your information is protected. We won't sell your personal information without your consent or share it with other organisations for their own marketing purposes.

We may also disclose your personal information to our group companies or to third parties:

We may share your personal data:

- with our group companies and affiliates, all within the hotel sector, which require access to your data for correct provision of the chosen services.
- with our advertising networks and partners, commercial partners (including but not limited to owners of hotel businesses we manage or to whom we have licensed a brand and/or hotel system), and sharing with our suppliers.
- with third-party payment processors, payment service providers, IT and marketing support service providers and other consultants, vendors and service providers who need access to such information to carry out work or provide services on our behalf or who help us to provide these services to you;
- with anyone involved in the process of making your travel arrangements (e.g. travel agents, group travel organisers and your employer) in order to fulfill contractual obligations;
- with any law enforcement, courts, Government or regulatory bodies (in whatever jurisdiction), or otherwise in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, court order or legal process;
- if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of our hotel or any third parties
- in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company, or any change of management of a hotel;
- with our advisors, which includes our accountants, auditors, lawyers, other professional advisors and business contacts for the purpose of assisting us to

better manage, support or develop our business and comply with our legal and regulatory obligations;

- with any other party at your consent or at your direction; and
- otherwise as permitted or required by applicable laws and regulations.

Especially for our event planning services, we may only share your information with trusted third parties who are assisting us in conducting our business. These trusted third parties agree to keep this information confidential. Your personal information will never be shared with unrelated third parties

User data may be disclosed to:

1. data provided for **making reservations, both through our website, the call center, the contact form on our website and emails for room bookings and combined packages (airline tickets and room bookings)**: with the Companies belonging to or affiliated with Lindos Aqua Terra Hotel, all within the hotel sector, which require access to your data for correct provision of the chosen services. The sole purpose of this communication will be to be able to provide the services to your correctly.

2. data provided for **changing or cancelling their reservations**: with the Companies belonging to or affiliated with Lindos Aqua Terra Hotel, all within the hotel sector, which require access to your data for correct provision of the chosen services. The sole purpose of this communication will be to be able to provide the services to your correctly.

3. data provided for communication using our **contact form**: will not be disclosed to third party companies and will be used solely for internal administrative purposes

4. for **wedding and other event planning services**: with the Companies belonging to or affiliated with Lindos Aqua Terra Hotel, all within the hotel sector, which require access to your data for correct provision of the chosen services. We will also disclose information to public authorities responsible for granting wedding authorisation documents (churched, town hall, courts etc) any lawyers and other consultants, or any third party companies for the provision of the requested services.

5. data provided for **submitting comments in our electronic wedding/event planning GuestBook**: will not be disclosed to third party companies.

Our site may contain links to other websites belonging to third parties. We do not control the privacy practices of these other websites. You should therefore make sure when you leave our site that you have read that website's Privacy Notice.

## **Overseas Transfers of Your Personal Data**

Your personal data will be stored at our hotel in which you stay or visit. Your personal data will not be transferred to countries outside the EEA.

In case we may need for some reason to transfer such data, we will only transfer such data in countries that satisfy the adequate or comparable levels of protection in order to protect personal data held in that jurisdiction, and (where we are required to do so) solely under your consent.

In case personal data is transferred from the EU to outside the EU, we use Model Clauses, ensuring that such data transfers are compliant with applicable privacy legislation.

The information you provide to us may be given to our third party service suppliers outside the European Economic Area for the purpose of delivering the personalized services and communications stated above. Lindos Aqua Terra Hotel will always take steps to ensure that your information is used by third parties in accordance with this Privacy Notice and that your information is kept secure at all times. In particular, in relation to any transfer to a third party in a country that is not subject to an adequacy decision by the EU Commission, such transfer will be appropriately protected through mechanisms such as EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review upon request.

## **Our processors**

There may be situations where we use data processors – companies who act on our behalf – to collect your information for us or to use the personal data we pass to them to provide your service. These processors can only use your information in accordance with our instructions and for the purposes in this Notice.

## **Travel agents and partners**

We collect information about you when it is provided to us by third parties. This might include online travel agents, travel websites, and other partners. This could be when you make bookings, review your stay online, or where you interact with anyone who promotes our brands. You should always read the privacy policies of travel companies or other third parties you use, as they will use your information in accordance with their own privacy policies.

When you, or someone on your behalf, make a booking using travel agent, booking platform or other third party to use our services, they may pass us information about your booking, including information about anyone else on that booking. The same would be true where you use a third party to make enquiries about our products or services.

Where you interact with third parties who promote our services for us, these third parties may pass us your information.

We may also obtain information about you from our partners and other companies that have your permission to share your information both online and offline, like insight providers.

#### **Do not track signals or browser/device settings**

Our websites are not designed to respond to “do not track” signals or browser/device settings.

#### **Analysis and product development**

We may use your information to improve the products and services we offer. For example, we may look at the preferences our guests have when they stay with us to offer more relevant personalised services to them.

#### **Linked services, third party sites and content**

Our website may, from time to time, contain links to other websites which are outside of our control and are not covered by this Notice. We do not accept any responsibility or liability for other sites’ privacy policies. If you access other websites using the links provided, please check their policies before submitting any personal information.

#### **Cookie Policy**

Our site uses cookies. A "cookie" is a small file of letters and numbers that is sent to your computer by a website and automatically saved on your computer by your web browser (e.g. "Internet Explorer"). Each time you request a page from the website, your web browser sends this cookie back to the website server.

You are not obliged to accept cookies. If you wish, you can set your browser to notify you before you receive a cookie so you have the chance to accept it and you can also set your browser to refuse to receive or send all cookies. The website [www.allaboutcookies.org](http://www.allaboutcookies.org) contains step-by-step guidance on how cookies can be switched off by users.

For more information about our cookie policy visit:  
<https://lindosaquaterra.gr/cookie-policy.pdf>

Please note that our advertisers and third party partners may also use cookies. These parties may use so-called “third party” cookies so that they can track your response to their adverts and/or identify you on any other website that you visit which also contains their adverts. Please refer to their Privacy Notice for further details.

### **Social media login**

Our websites and apps provide plug-ins or hyperlinks to social media websites, including Facebook, Twitter, Pinterest, and Instagram.

If you make use of, or log-in to, the social media features on our websites or apps, we may (depending on your privacy settings) access, use and store information about you, including, but not limited to: your name, e-mail address, gender, location, profile, picture, contacts, and any other information you have chosen to make available.

To find out more about the reasons and extent to which social media sites collect and process your data, or to change your privacy settings, please refer to your social media provider’s privacy policy.

### **Changes to our Privacy Notice**

From time to time we may make changes to this Notice. This might be in relation to changes in the law, best practice, changes to the services we provide or collection and use of your personal information. We will always display clearly when the Notice was last updated and where appropriate, notify you of any relevant changes.

### **Contact**

If you would like to get in touch with us, please contact:

#### **Lindos Aqua Terra**

85107 Vlichia Beach Lindos, Rhodes, Greece

Tel.: +30 22440 31605

Email: [info@lindosaquaterra.gr](mailto:info@lindosaquaterra.gr)

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