
	<b>PRIVACY AND COOKIES POLICY</b>	<b>GDPR-P-02</b>
<i>Αρ. έκδοσης: 1</i> <i>Η/νία:</i> <i>12/03/2019</i>	<b><i>Κανονισμός ΕΚ 2016/679 – GDPR (ΓΚΠΔ)</i></b>	<i>Σελίδα 1 από 5</i>

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## 1. Xenos Group Hotels and Hotel Management

Our Hotels are members of Xenos Group Hotels. These are:

Company/Data Controller	A/A	Hotel Name
Xenos Luxury Hotels S.A	1	Olea All Suite Hotel
	2	Aqua
Christos Xenos S.A	3	Zante Maris Suites
	4	Aqua Bay
	5	Zante Maris
	6	SuneoClub Tsilivi Admiral
	7	Planos Bay
	8	Admiral
	9	Commodore
	10	Captains
Ioniki A.T.A.X.E	11	TUI Sesnimar Caravel Resort & Spa
Ioannis Xenos A.X.T.E	12	Aqua Bay Suites
Filip A.X.T.E.E	13	Planos Apartments

All Hotels are located in Zakynthos Island, in Greece.


**Data Controller** is defined as the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

## 2. Information/Personal Data we may collect

The types of personal information that we may collect and process include:

- Your name, telephone number, email, address, date of birth, nationality and other similar information which may appear in your passport, as well as other formal identification
- Information about services you want, or preferences you express
- Credit card information
- Medical information we need, in order for you to use our spa or gym services/areas
- Details of purchases you make from us
- Details of your visits to our websites (see paragraph 6 below)
- Others information in relation with your reservation
- We may also invite you to complete surveys that we use for research purposes, although you do not have to respond to them

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### 3. How we use your Personal Data – Duration of Storage

We may collect and process your Personal Data:

- To communicate with you about your reservation or billing details, or our services (via newsletter with your consent)
- To improve our services
- To improve the functionality of our websites in order to provide to you more personalized experience (see paragraph 6 below)
- To notify you with possible changes to our services
- For marketing analysis (website traffic measurement etc) for strictly internal use

By submitting the personal data of a third person to us you, please confirm that you have their consent to do so.

We don't collect any sensitive data related to your race, or condition, or religion.

In case you submit your CV via email or other electronic or physical way (hard copy), we will use your Personal Data for your job application. We may also use your Personal Data to send you announcements of future job opportunities, always with your consent given to us throughout personal interview. In order to evaluate your job application, we may ask for additional Personal Data (information about your physical or mental health and criminal record), again with your consent.

We will keep your Personal Data for as long is necessary. The principles of <minimizing the data> and <restricting storage>, as well as other applicable laws (accounting legislation etc), will determine the storage period time.

We will never keep any of your Personal Data after your stay in one of our hotels (unless we are obliged by legislation to keep some for a specific period of time), without your given consent.


### 4. Your rights in relation to your Personal Data

We make sure that all subject rights are fully met.

These rights are:

- The Right of Access. You have the right to know what data is being or has been collected about you and how these data are being processed
- The Right to Data Portability. You have the right to transfer Personal Data from one electronic processing system to and into another electronic processing system (even between organizations)
- The Right to Erasure (where there is no longer any legitimate basis for processing it). When a Data Controller is relying on your consent as their legal basis to process your Personal Data, you have the right to withdraw consent and ask for your Personal Data to be deleted
- The Right to Correction. You have the right to make changes to inaccurate Personal Data
- The Right in the scope of Consent (if that's the legal ground for processing). Being the subject, you must be informed in clear and plain language. If the Data Controller is relying on your consent to

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process your Personal Data, you may object to elements of processing or withdraw your consent altogether

- In the circumstances provided for in applicable law: the Right to Restrict Processing and Object to Processing your Personal Data.

When the processing of your Personal Data is strictly based on your consent, you have the right to withdraw your consent, anytime you want. If you want to exercise any of the rights mentioned above, or if you want to submit a complaint, please use our contact details (see paragraph 9 below).

## 5. Sharing your Personal Data

We may disclose your Personal Data to third parties in one (or more than one) of the following cases:

- If you want to use services of other Companies that provide services to our customers (for example car rentals etc)
- If we must share some of your Personal Data with external Data Processors (for example external accountancy etc). We maintain strict confidentiality agreements with all our external Data Processors, to make sure that all your rights are fully met upon request
- If we are required to disclose/share your personal data in order to comply with any legal obligation (criminal or other), or to protect the rights, property or safety of Xenos Group Hotels, our customers or others. This includes exchanging information with other companies and organizations to increase protection against fraud and/or to reduce credit risk

In case you request credit, your Personal Data will be used and disclosed to appropriate third parties in accordance with applicable laws for the purpose of determining whether to grant and maintain a credit to you.

## 6. Website Cookies


Cookies are small text files placed on a user's computer (or Smartphone), which are commonly used to collect personal data. Cookies can gather information about the use of a website or enable the website to recognize the user as an existing customer when they return to the website at a later date. This file is neither a virus nor spyware. Cookies are used to make the user's web experience faster, convenient and personalized. For example you can select a language to view a website the first time you visit it. When you visit the website again it will save your preference.

Xenos Group Website uses cookies. A cookie is a tiny file that our Website places on your Computer and helps us to distinguish you from other users of our Website, or to personalize your browsing (by remembering your preferences).

Xenos Group Websites uses the following cookies:

- Analytical/performance cookies. They are used for counting and recognition of visitors, helping us to improve the way our Website works and ensuring that users are finding what they are looking for easily;
- Targeting cookies. They record your visit to our Website (which pages you often visit) in order to make it more relevant to your interests;

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- Functionality cookies. They are used to recognize you, each time you return to our Website (for content personalization etc.);
- Strictly necessary cookies. They are used to prevent fraud and to increase security of our Website.

Most cookies can be erased or blocked. However, if you do so, you may not be able to access parts of our website and it may make your browsing experience less personalized and enjoyable. To erase cookies you will need to find the folder or file where they are stored on your device and delete them. Session cookies will automatically be deleted when you close your web browser. You can also block a website's cookies. You can do this by configuring your browser settings (use built-in help files).

## 7. Storage and Security

All Personal Data you provide us via our website are stored on our secure servers. Our Websites use Hypertext Transfer Protocol Secure (HTTPS). The communication protocol is encrypted using Secure Sockets Layer (SSL). However, despite our efforts, the transmission of information over the Internet can never be completely safe. Although we have safety procedures and security measures, we cannot guarantee the security of the data transmitted to our site. Therefore, any online data transmission is being made at your own risk. All Personal Data you provide us in hard-copy-form are stored in secured locations.

## 8. Third Party links

We do provide third-party links, products or services on our websites.

## 9. Contact details

If you wish to exercise any of the rights set out above, or if you have any complaints about the processing of your Personal Data, please contact:

Xenos Group central email: [info@xenoshotels.gr](mailto:info@xenoshotels.gr)

and/or

Xenos Group D.P.O for all hotels: [spiros.loukopoulos@xenoshotels.gr](mailto:spiros.loukopoulos@xenoshotels.gr)

## 10. Changes to Privacy Policy

We reserve the right to update this Policy in cases of:

- Expanding our services
- Complying with future applicable legislation

Any changes will be posted on this page and (when possible/appropriate) notified to you by email.

This Policy was last updated on 28 March 2019.

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