Privacy Policy - Hotel Adler Zurich

1. Information about our Data Protection Officer and the content of this Privacy Policy

- Hotel Adler AG, Zurich, is the operator of Hotel Adler (hereinafter referred to as "**hotel**") and the website www.https://hotel-adler.ch/ (hereinafter referred to as "**website**"). Unless stated otherwise in this Privacy Policy, we are responsible for the data processing described in this Privacy Policy.
- Please take note of the following information to ensure that you know what type of personal data we collect from you and what purposes we use it for. When it comes to data protection, we are primarily guided by the legal requirements of Swiss data protection law, in particular the Federal Act on Data Protection (FADP) and the GDPR, insofar as their provisions are applicable.

2. Contact for data protection matters

If you have any questions about data protection or wish to exercise your rights, please email:

Ms Tessy Bloch, Resident Manager at datenschutz@hotel-adler.ch.

3. Scope and purpose of the collection, processing and use of personal data

If you contact us (for example, by email, phone or contact form), your personal data will be processed. We process the data that you have provided us with, such as your name, email address or telephone number as well as your request. We process this data in order to respond to your request (for example, to provide information about our hotel, to assist with the fulfilment of any agreements, such as questions about your booking, incorporation of your feedback into the improvement of our services, etc.).

4. Data processing for bookings

4.1. Bookings via the website or by phone

You can book an overnight stay on our website. We collect the following data for this purpose, where mandatory information is marked with an asterisk (*) during the booking process:

- Contact details: surname, first name, phone, email
- Address: country, city, postcode, address
- Comments and requests
- Payment information: credit card details
- Details of your desired room
- Optional information: newsletter
- Confirmation of details and acceptance of the GTC and Privacy Policy
- We use the data to identify you before entering into an agreement and to facilitate communication with you.
- Bookings can also be made by telephone. The aforementioned information will also be requested to make a booking.
- Insofar as this is necessary to fulfil the agreement, we will also pass on the required information to any potential third-party service providers (such as event organisers or transport companies).
- To process bookings using the contact form, we use a software application created by Hotelbird GmbH, based in Munich, Germany (hereinafter referred to as **Hotelbird**). Therefore, your data may be stored in a database held by Hotelbird, which will enable Hotelbird to access your data if this is necessary in order to provide the software and to provide support in the use of the software (as per https://hotelbird.com/en/privacy-policy/).
- We also collect your personal data in order to comply with statutory reporting obligations arising in particular from hospitality or police law. To the extent that we are obliged to do so under the applicable regulations, we forward this information to the responsible authority.

4.2. Booking via a booking platform

If you book via a third-party platform (i.e. Agoda, Globres, Amadeus, Aleno, Sunbeds, Hotelbeds, Get Local, Expedia, Trip Advisor, Booking, etc.), we receive various personal data from the respective platform operator in connection with your booking. This is generally the data listed in Section 4.1 (hotel booking) or 4.3 (restaurant booking) of this Privacy Policy. In addition, any enquiries relating to your booking may be

forwarded to us. We will process this data specifically for the purpose of recording your booking as requested and to provide the booked services.

4.3. Restaurant reservations

- On our website, you have the option of reserving a table in a restaurant named on our website. Depending on the respective offer, we collect the following data for this purpose:
 - First/last name
 - Email address
 - Phone number
 - Comments
- We collect and process the data in order to process the reservation, in particular, in order to make your reservation request according to your wishes and to contact you in the event of any uncertainties or problems.

5. Data processing during payment processing

5.1. Payment processing in the hotel

If you purchase products, obtain services or pay for your stay at our hotel using an electronic means of payment, the processing of personal data is required. When you use the payment terminals, you transmit the information stored in your payment method, such as the name of the cardholder and the card number, to the payment service providers involved (such as providers of payment solutions, credit card issuers and credit card acquirers). These providers also receive the information that the payment method has been used at our hotel, as well as details of the amount and the time of the transaction.

5.2. Online payment/booking

If you make website bookings that require payment, you will need to provide your credit card details. These details, as well as the fact that you have purchased a service from us for the relevant amount and time, will be sent to the respective payment service providers (e.g. providers of payment solutions, credit card issuers and credit card acquirers). In addition, always observe the information provided by the respective company, in particular, the privacy policy and the general terms and conditions.

5.3. Invoicing of services received

If you obtain services during your stay (for example, additional overnight stays, transfers, restaurant), we will record and process the booking data (such as time and comments) as well as the data concerning the service booked and obtained (such as subject of the service, price and time of receipt of the service), in addition to your contract data, in order to process and bill the service.

6. Further data processing

6.1. Email marketing

- 17 When registering, you may consent to receive marketing emails and newsletters about our hotel and related information about products and services (confirmation by double opt-in). These marketing emails may include information on how to provide feedback or evaluate our products and services. Collecting data such as your title, first name and surname allows us to assign the registration to an existing customer account and thus personalise the content of marketing emails.
- We will use your data to send marketing emails until you withdraw your consent. You can withdraw your consent at any time, which is especially simple to do via the unsubscribe link in all our marketing emails.

6.2. Use of the Wi-Fi network

In our hotel, you have the opportunity to use the Wi-Fi network operated by Monzoon Networks AG free of charge. Information on the possible processing of data can be found in the privacy policy of Monzoon Networks AG https://global.monzoon.net/public/gdpr/en/.

6.3. Processing data from video monitoring

To protect our guests and employees as well as our property, and to prevent and penalise unlawful conduct (especially theft and property damage), we have installed cameras in public areas of our hotel, with the exception of the sanitary facilities. Image data is only evaluated if unlawful behaviour is suspected. Otherwise, the images are automatically deleted after 90 days.

6.4. Check-in and reporting obligations

When you arrive at our hotel, we may require the following information from you and the persons accompanying you. Mandatory information is marked with an asterisk (*) in the relevant form:

- First name and surname
- Billing address
- Date of birth
- Nationality
- ID card or passport
- Day of arrival/departure
- Vehicle registration number if access to the hotel is provided
- We collect this information in order to comply with statutory reporting obligations resulting, in particular, from hospitality or police law. To the extent that we are obliged to do so under the applicable regulations, we forward this information to the responsible authority.

6.5. Job applications

- You have the option of sending an open application or applying to a specific job advertisement. Any personal data you provide will be processed by us.
- We use this data to check your application and suitability for employment. Documents submitted by unsuccessful applicants will be deleted at the end of the application process unless you explicitly consent to a longer retention period, or we are legally obliged to retain them for a longer period.
- Online applications submitted via our website https://hotel-adler.ch/jobs/ are deleted on a weekly basis, unless the documents are required during the application process.

7. Transfer of data abroad

We may also transfer your personal data to third parties abroad if this is necessary to carry out the data processing specified in this Privacy Policy. In the course of this transfer, the legal regulations on the disclosure of personal data to third parties will, of course, be complied with. Countries to which data is transferred include those which, in accordance with the ruling by the Federal Council and the EU Commission, have an adequate level of data protection (such as the member states of the EEA or, from the point of view of the EU, also Switzerland).

8. Website

8.1. Visiting our website

- When you visit our website, the servers of our hosting provider cyon GmbH, Basel, temporarily store each access in a **log file**. The following data is collected without your involvement and stored by us until it is automatically deleted:
 - IP address of the accessing device
 - Date and time of access
 - Name and URL of the retrieved file
 - Access status/http status code
 - If available, the referrer (referring page)
 - Volume of data transmitted during access
 - Browser identification (browser name and version)
- Further information can be found here: https://www.cyon.ch/support/a/raw-logs
- Finally, when you visit our website, we use cookies as well as applications and tools which are based on the use of cookies. Among other things, cookies help to make your visit to our website simpler, more pleasant and more appropriate. We use cookies for various purposes that are necessary for your required use of the website, in other words, reasons that are "technically necessary".

8.2. Tracking and web analysis tools

We use the web analysis services listed below to continuously optimise our website based on identified needs. In this respect, pseudonymised user profiles are created and cookies are used.

8.2.1. Google Analytics

- We use the web analysis service Google Analytics provided by Google Ireland Limited (Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland) and Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (Google).
- Users can prevent Google from collecting and processing the data generated by the cookie and relating to the use of the website by the

user concerned (including their IP address) by downloading and installing the browser plug-in available at the following link: http://tools.google.com/dlpage/gaoptout?hl=en-GB.

8.2.2. Google Ads

We use the services of Google for online advertising. Google uses cookies for this purpose (see the list here: https://business.safety.google/adscookies/?hl=en_US), which enable your browser to be recognised when you visit other websites. The information generated by the cookies about your visit to these websites (including your IP address) is transmitted to a Google server in the USA and stored there. Further information on data protection at Google can be

found here: https://policies.google.com/privacy?hl=en.

9. Storage

We only store personal data for as long as is necessary to carry out the processing described in this Privacy Policy within the scope of our legitimate interest. In the case of contractual data, storage is required by statutory retention obligations. Requirements which oblige us to retain data arise from accounting regulations and tax law provisions. In accordance with these provisions, business communications, contracts concluded and accounting documents must be retained for up to 10 years.

10. Data security

We make use of suitable technical and organisational security measures in order to protect your personal data stored by us against loss and unlawful processing, and especially against unauthorised access by third parties. We have obliged our employees and the service providers contracted by us to maintain confidentiality and to ensure the protection of your data. Furthermore, these persons are only granted access to personal data to the extent necessary for performing their tasks.

11. Your rights

- Right to information: You have the right to request access to your personal data stored by us free of charge and at any time if we process it.
- Right to correction: You have the right to have inaccurate or incomplete personal data corrected and to be informed about the correction.

- Right to erasure: You have the right to have your personal data deleted under certain circumstances.
- Right to object: You can opt out of data processing in connection with direct marketing (e.g. marketing emails) at any time.
