

Data Protection Policy

La Grotta PC holds as its highest priority the protection of your personal data. We make sure that we carefully store and process the information you share with us.

La Grotta PC applies technical and physical data security measures as well as internal procedures to protect your personal data. We constantly strive to improve our systems and procedures so that they live up to your expectations.

We thank you for your support.

Scope

At La Grotta PC and it's branch registered as Crete Wine Escapes at Dimakopoulou 78, 74100, Rethymno (hereinafter referred to as "La Grotta", "we", "us"), understand the importance of protecting the privacy of our customers; We are always at your disposal to answer any questions about the way in which we collect, use, share, transfer, and store your information. This Privacy Policy summarizes the practices we follow regarding your data.

The charter below outlines the policy of La Grotta PC, La Grotta Wine Boutique Hotel and its restaurants, spas, and incoming tours managed by the company La Grotta PC with license number 146185450000 regarding the protection of your personal data.

This charter applies to all information and personal data provided by you or collected during a stay at our Hotel or during your visit to our website www.lagrotta.com and www.cretewineescapes.com (hereinafter referred to as "the website").

This Privacy Policy also applies to all websites, online applications, and online and offline promotional actions by La Grotta PC as well as any Service or function provided by us that refers to this Privacy Policy or provides a link hereto (collectively referred to as our "Services").

Via the websites the Hotel and/or La Grotta PC may end up collecting personal data on any person posing a question to the Hotel and/or La Grotta PC under "Contact" on the website or making a reservation online at an establishment managed by La Grotta PC or through our collaborating booking engines.

Please note that the Privacy Policy applies to your use of our Services, regardless of whether you use a computer, mobile phone, tablet, TV, or any other device to access our Services. Additionally, this privacy policy applies to Services that are provided without the use of electronic means.

It is important that you carefully read this Privacy Policy because with every use of our Services you agree to the practices described herein. If you do not agree with the practices described in this Privacy Policy, you should not use our Services.

Consent

“Personal data” means any information that can be collected or recorded in such way that may allow direct (e.g. surname) or indirect (e.g. phone number) identification of a natural person.

Before you provide us with your personal information, we recommend that you read this Policy.

This "Data Protection Policy" is a part of the terms and conditions that govern our Services. By accepting these terms and conditions, you explicitly accept the provisions of this Policy.

Purpose of data collection

We collect personal data in order to manage your relation with La Grotta and offer you our Services. Data is also collected in order to provide you with personalized services.

We collect personal data for the following purposes:

To manage your reservations and any other Services.

Create and store legal documents in accordance with applicable law.

Collect data to reserve your stay and meet requests relating to it (e.g. room preferences).

To manage your Hotel stay.

Monitor the use of our services (e.g. minibar, Wi-Fi access, room telephone, etc.)

Manage personal data for operational purposes.

To improve our Services

Tailor our services to meet your requirements now and in the future.

Process data for marketing and promotional purposes.

Inform you about offers and new or existing Services.

Provide you with useful information concerning your stay, our facilities or our Services.

Provide recommendations based on your previous activities.

Manage customers' claims and complaints.

To manage our relationship with you before, during or after your visit.

Manage customer database.

Create statistical data and reports.

Send newsletters, promotional offers or contact you by telephone.

Manage deletion requests from newsletter subscriptions or other lists.

To improve system security.

Record data to ensure security and to prevent fraud.

To comply with Greek and European Law.

To ensure the safe use of our Services and our facilities or that of our affiliates.

Spas, Fitness facilities, yachts etc.

To manage accounting and financial questions and potential disputes.

4. Personal data we collect

Information provided directly by you

In order to provide you with our Services we are obliged to request the following details about you and/or your family members:

- Contact details (e.g. First name, surname, father's name, passport number, ID-card details, phone number, home address, e-mail address)
- Personal data (e.g. date of birth, nationality, place of birth)
- Billing details (e.g. credit card number, VAT number)
- Date and time of arrival and departure and/or flight number
- Preferences and interests (e.g. non-smoking room, preferred floor, type of bed, sports, cultural interests)
- Data about your health, such as medicine reports and certifications, medical test results, data on pathological diseases, allergies, etc.
- Questions and comments submitted during or after your stay in one of our Hotels.

The data we collect on persons under the age of 16 are restricted to given name, surname, nationality, and date of birth. This data can only be provided by an adult or accompanying guardian.

Please make sure that children do not send us personal data without your consent, especially through the internet. Should any information of this type be sent to us, please let us know by e-mail at dataprivacy@lagrotta.com to arrange the deletion of such information.

Moreover, information such as your passport number, your hobbies, health issues or conditions (e.g. allergies or diseases), or whether you are a smoker or not can be described as sensitive. We retain such information only if we are obliged to do so by applicable law or if you have explicitly given us your consent (e.g. to provide you with an appropriate Service, such as a special diet).

Information on your use of our Services

Apart from the information you provide directly, we may collect information on your use of our Services. For example, we may collect:

- Device information, such as hardware model, International Mobile Equipment Identity (IMEI), and other unique device identity data, MAC address, IP address, operating system issue, and setting of the appliance you use to access our Services.
- Connection information, such as the time and duration of use of the Service, search commands entered in the Services, as well as information that may be stored in cookies we have placed on your device.
- Location information, such as GPS signal of your appliance or information on WiFi access points that may be transmitted to us when you use our Services (e.g. WiFi).
- Audiovisual information, such as video recordings collected through closed circuit television (CCTV) for security reasons.
- Other information that relates to your use of our Services, such as the applications that you use, the websites that you visit, and the way in which you interact with content offered through a Service.

iii. Information from third parties

We may receive information about you from available public and commercial sources. This, we may combine with other information that we receive directly from you or in relation to you.

iv. Other information we collect

We may collect other information about you, your device, or your use of services, always with your consent.

You may choose not to provide certain types of information, but this may limit your access to certain Services.

5. When data is collected

We collect personal data in various cases, such as:

a) Hotel activities

- Room reservation
- Check-in and payment
- Reservation of seat and/or use of hotel services, such as catering, spa, and recreational services
- Various requests, complaints, and/or disputes

b) Participation in marketing programs or other La Grotta's events

- Participation in online and offline surveys (for example, customer satisfaction survey)
- Participation in tours or other activities organized by La Grotta or other affiliated companies.
- Subscription to mailing lists in order to receive offers and other promotions by email

c) Transmission of information from third parties

- Tourist agencies, tourist offices, online reservation systems (e.g. booking.com, expedia.com, etc.), and other reservation systems.

d) Actions through electronic devices

- Connection to the WiFi network of our hotel
- Completion of online forms (e.g. reservation forms, satisfaction survey forms, enquiry forms etc.)

6. Data Storage

Your data is stored for the period necessary to fulfill the purposes outlined in this Policy, unless a longer period of retention is required or permitted by the Law or if you have explicitly agreed to the retention.

Your consent to the storage of your data can be retracted at any time by sending us an e-mail at dataprivacy@lagrotta.com.

7. Third party recipients of your data

La Grotta PC does not share your personal data to third parties for their own business or marketing purposes without your consent. However, we may disclose your information to the following entities:

Business collaborators. We may disclose your information with trusted business partners. These entities may use your information to provide you with services you have requested make provisions relating to your interests or offer you promotions, advertisements, and other material.

Service providers and/or any third parties that may process information on our behalf. We may also share your information with companies that provide services on our account or behalf, such as IT contractors, bulk mailers, banks, credit card institutions, law firms, mail service companies, printing services companies, etc.

Credit approval: Upon submission of a credit approval claim, personal data are utilized and disclosed to designated third parties according to applicable legislation in order to decide on the credit approval and its subsequent level.

Other third parties, if so required by law or in order to protect our Services. Situations may arise in which we share your information with other third parties:

- o To comply with the law or mandatory legal procedure (such as search warrants or other court orders)
- o To confirm or implement our compliance with the policies governing our Services
- o To protect the rights, ownership or security of La Grotta PC or any of our, business partners, or customers

Other third parties in relation to corporate transactions. We may share your information with third parties within the context of a merger or transfer, or in the event of bankruptcy.

Other third parties with your consent or at your command. In addition to the disclosures described in this Privacy Policy, we may share information about you with third parties if you give your consent or if you request us to do so.

To provide you the best possible service, we allow access to your personal data or to certain categories to competent, authorized members of our staff. This includes:

- Hotel staff & Management
- Reservations departments
- IT management collaborators or IT department of La Grotta PC
- Marketing/Guest Relations department
- Legal Services department, if and when required
- Medical Services, if and when required
- The Crete Wine Escapes team

8. Protection of personal data during international transfers

For the purposes set out in paragraph 3 of this Policy, we may transfer your personal data to internal or external recipients who may be located in countries that offer different levels of protection for personal data.

The European Commission has the power to determine, on the basis of article 45 of the General Data Protection Regulation (EU 679/2016) whether a country outside the EU offers an adequate level of data protection, whether by its domestic legislation or of the international commitments it has entered into.

The effect of such a decision is that personal data can flow from the EU to a recognized by the EC third country without any further safeguard being necessary. In others words, transfers to the country in question will be assimilated to intra-EU transmissions of data.

You can view a list of the countries that the European Commission has so far recognized, [here](#).

Please note that data protection and other laws in the countries not determined by the EC as adequate concerning Data Protection, to which your information may be transferred may not be as protective as those in your country. To protect your privacy, the transfer will take place according to the legislation governing the processing of personal data.

La Grotta PC takes all reasonable measures to safeguard the transfer of personal data to an external recipient in a country that offers a different level of privacy than the country where the personal data is collected.

9. Protection of your information

We have taken organizational and technical measures to protect the information that we collect in relation to our Services, especially sensitive personal data. Our IT managers implement practices to ensure the safety of networks and the encryption of data.

However, please bear in mind that despite the reasonable measures that we take to

protect your information, no website, internet transmission, computer system or wireless connection is ever completely safe.

10. Cookies

Cookies are small files that store information on your computer, mobile phone, or other device. They allow the entity who places these files on your device to identify you across different websites, services, devices, and/or browsing times.

Cookies serve a range of useful purposes. For example:

- Cookies can remember your login credentials so you do not have to enter them again each time you connect to a service.
- Cookies help us and third parties to understand the most popular parts of our Services; they help us see which pages and features are visited by the users and how much time is spent on each. By studying this kind of information, we can customize our Services and provide you with a better experience.
- Cookies help us and third parties to understand which advertisements you have viewed so you do not receive the same advertisement each time you access the Service.
- Cookies help us and third parties provide you with relevant content and advertisements by collecting information about your use of our Services and other websites and applications.

When you use a website to access our Services, you can make settings in your browser to accept all cookies, reject all cookies or notify you when cookies are sent. Each browser is different. Refer to the “Help” menu of your browser to find out how you can change your cookie preferences. The operating system of your device may offer more control settings for cookies.

However, please note that certain Services may have been designed to work with cookies and that deactivating cookies may affect your ability to use those Services or part of those Services.

11. Your rights

You have the right to request a copy of all data we hold for you. Before disclosing any personal data to you, we may request verification of your identity. You also have the right to have your data erased or rectified and the right to restrict and to object to the processing of your personal data by La Grotta. Additionally, you have the right to withdraw your consent from receiving marketing materials from us, the right to receive the personal data that we keep for you in a structured, commonly used and machine-readable format and to have them transmitted to another company suggested by you without hindrance from our firm. The above rights can be exercised by sending an email to the email address provided hereunder.

We may refuse to handle requests that are repeated to an unreasonable degree, require disproportional technical effort, jeopardise the privacy protection of others, are extremely impractical, or involve access that is not otherwise required by domestic law.

If you consider that La Grotta PC violates the applicable data protection laws when processing your personal data, you also have the right to lodge a complaint with the Data Protection Authority.

12. Updates

This policy may be amended from time to time. To ensure that you are aware of any changes, please check this policy on a regular basis, especially before submitting a reservation request with our hotel. By accessing or using our Services after we have posted an updated version of the Privacy Policy, you agree with the new practices contained in the update. The most recent version of the Data Protection Policy will always be available under our Contact Us page at www.lagrotta.com and www.cretewineescapes.com

12. Questions and contact

If you have any questions regarding this Policy or the protection of data at La Grotta PC, please contact us at the following address:

La Grotta PC - Attn. Mrs. Helena Dib

Address: 49 N. Patelarou str., Rethymno, 74100

E-mail: dataprivacy@lagrotta.com or dataprivacy@cretewineescapes.com