

## Data Protection Notice

### A. Controllers's details

1. The company under the trade name FATTAL ESPERIA ANAPTYXI KAI DIACHEIRISI AKINITON XENODOCHEIAKES EPICHEIRISEIS MONOPROSOPI ANONYMI ETAIREIA and distinctive title FATTAL ESPERIA S.A., established in Chalandri (street Pentelis Avenue Street, no. 7A, zip code 15235), (hereinafter referred to as the **"NYX Esperia Palace Athens"**) hereby informs you, as the controller, in accordance with Regulation (EU) 2016/679 (hereinafter referred to as the "GDPR") and the relevant provisions of Hellenic legislation on the protection of personal data, as applicable, on the type of personal data collected, the source of their collection, the reason for their collection and processing, any recipients thereof, their time of retention, their transfer outside the EEA and your rights in relation to the processing of your personal data.
2. The company under the trade name FATTAL-TWO HOTEL TOURIST AND REAL ESTATE SINGLE MEMBER SOCIETE ANONYME and distinctive title FATTAL-TWO SINGLE MEMBER S.A., established in Chalandri (street Othonos 6 and Herodotus 5, zip code 15231), (hereinafter referred to as the **"Seafos"**) hereby informs you, as the controller, in accordance with Regulation (EU) 2016/679 (hereinafter referred to as the "GDPR") and the relevant provisions of Hellenic legislation on the protection of personal data, as applicable, on the type of personal data collected, the source of their collection, the reason for their collection and processing, any recipients thereof, their time of retention, their transfer outside the EEA and your rights in relation to the processing of your personal data.
3. The company under the trade name FATTAL GREECE OpCo MONOPROSOPI ANONYMI ETAIREIA and distinctive title FATTAL GREECE OpCo SINGLE MEMBER S.A., established in Chalandri (street Othonos 6 and Herodotus 5, zip code 15231), hereinafter referred to as **"NYX Hotel Thessaloniki"**, hereby informs you, as the controller, in accordance with Regulation (EU) 2016/679 (hereinafter referred to as the "GDPR") and the relevant provisions of Hellenic legislation on the protection of personal data, as applicable, on the type of personal data collected, the source of their collection, the reason for their collection and processing, any recipients thereof, their time of retention, their transfer outside the EEA and your rights in relation to the processing of your personal data.
4. FATTAL GREECE OpCo MONOPROSOPI ANONYMI ETAIREIA and distinctive title FATTAL GREECE OpCo SINGLE MEMBER S.A., established in Address: Athinon 2, Kolymbia 851 03, Rhodes hereinafter referred to as **"Leonardo Kolymbia Resort"**, hereby informs you, as the controller, in accordance with Regulation (EU) 2016/679 (hereinafter referred to as the "GDPR") and the relevant provisions of Hellenic legislation on the protection of personal data, as applicable, on the type of personal data collected, the source of their collection, the reason for their collection and processing, any recipients thereof, their time of retention, their transfer outside the EEA and your rights in relation to the processing of your personal data.

Hereafter collectively referred to as the “Hotels”.

## **B. Definitions**

**For the purposes of the present Data Protection Notice, the following terms shall have the meaning set out below:**

- **‘Personal Data’** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **‘Processing’** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **‘Controller’** means 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. For the purposes of this Notice, the Hotels act in their capacity as a Data Controller;
- **‘Applicable Law’** means the relevant national and Union legislation on the protection of personal data and in particular Regulation (EU) 2016/679 (hereinafter referred to as the “GDPR”), the relevant jurisprudence of the CJEU, the Hellenic Laws no. 4624/2019, as and no. 3471/2006, as applicable and in force as well as the Decisions, Guidelines and Opinions of the European Data Protection Board (hereinafter referred to as the “EDPB”) and the Hellenic Data Protection Authority (hereinafter referred to as the “HDPa”).

## C. Data Processing Cycle

### C1: Guest registration at our Hotels

| Personal Data Categories                                                                                                                                         | Purpose                                                                                         | Legal Basis                                              | Retention Period                                                                                            | Recipients                                                                                                                                                                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Identification and pricing details</b> (full name, father's name, mother's name, gender, date of birth, Tax Identification Number, ID number/passport number) | Provision of hotel and tourism services, and compliance with relevant obligations under tax law | Article 6 para. 1 (b) GDPR – Performance of our contract | 5 or 20 years based on the respective limitation periods of Articles 250 and 249 of the Hellenic Civil Code | Processors:                                                                                                                                                                                                                                       |
| <b>Contact Details</b> (postal and e-mail address, telephone number)                                                                                             |                                                                                                 |                                                          |                                                                                                             | <ul style="list-style-type: none"> <li>Accounting service providers,</li> <li>providers of IT support services,</li> <li>providers of hosting services, cloud providers,</li> <li>providers of product and service promotion services.</li> </ul> |
| <b>Reservation details</b> (dates, type of reservation, any special preferences, etc.)                                                                           |                                                                                                 |                                                          |                                                                                                             | Financial institutions, to the extent necessary for the execution of transactions                                                                                                                                                                 |
| <b>Payment details</b> (credit cards, redemptions/debts)                                                                                                         |                                                                                                 | Article 6 para. 1 (c) GDPR – Compliance with tax law     |                                                                                                             | Tax authorities, in accordance with applicable tax legislation                                                                                                                                                                                    |
| <b>Health data</b> (e.g. any allergies, disabilities) <b>and preferences</b> (e.g. any dietary preferences), if applicable.                                      |                                                                                                 | Article 9 para. 2 (a) – Specific consent                 |                                                                                                             | <p>Lawyers, in so far as this is necessary for the exercise of the rights of the Hotels and the protection of its legitimate interests</p> <p>Lenoardo Hotels network</p>                                                                         |

## C2: Marketing and communication

| Personal Data Categories                                  | Purpose                        | Legal Basis                                                                                          | Retention Period                                                                                            | Recipients                                                                                                                                                                                                            |
|-----------------------------------------------------------|--------------------------------|------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contact details<br>(your email address)                   | Subscription to our newsletter | Article 6 par1. 1 (a) GDPR & Article 11 par. 1 of the Law 3471/2006                                  | Until the withdrawal of your consent                                                                        | Processors: <ul style="list-style-type: none"><li>• providers of IT support services</li><li>• providers of hosting services, cloud providers</li><li>• providers of product and service promotion services</li></ul> |
| Identification data<br>(your full name and email address) | Interactive user communication | Article 6 para. 1 (f) GDPR – Our legitimate interest in the direct marketing of the Hotels’ services | 5 or 20 years based on the respective limitation periods of Articles 250 and 249 of the Hellenic Civil Code |                                                                                                                                                                                                                       |
| Data contained in contact forms                           |                                |                                                                                                      |                                                                                                             |                                                                                                                                                                                                                       |

### C3: CCTV operation

| Personal Data Categories | Purpose  | Legal Basis                                                                                              | Retention Period                                                                                                       | Recipients                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------|----------|----------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Image and video data     | Security | Article 6 para. 1 (f) GDPR – Our legitimate interest in the security of our property and employee safety | 15 days<br><br>1 month in the event of an incident<br><br>3 months in the event of an incident involving a third party | <ul style="list-style-type: none"><li>• The competent judicial, prosecutorial and police authorities, should information be necessary for the investigation of a criminal offence involving persons or property of the Controller,</li><li>• the competent judicial, prosecutorial and police authorities, should they lawfully request data in the performance of their duties,</li><li>• the victim or the offender, should the data constitute evidence of a criminal offence.</li></ul> |

#### C4: Candidate employee data

| Personal Data Categories                                                                                                     | Purpose                                              | Legal Basis                                                                                    | Retention Period                                         | Recipients                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Identification details</b><br>(full name, father's name, mother's name, gender, date of birth, ID number/passport number) | Assessment of the candidate for recruitment purposes | Article 6 para. 1 (f) GDPR – Our legitimate interest in the recruitment of qualified personnel | 6 months or for a greater period subject to your consent | Processors: <ul style="list-style-type: none"> <li>• providers of IT support services</li> <li>• providers of hosting services, cloud providers</li> <li>• providers of product and service promotion services</li> </ul> |
| <b>Contact data</b><br>(postal and e-mail address, telephone number)                                                         |                                                      |                                                                                                |                                                          |                                                                                                                                                                                                                           |
| <b>Data contained in CVs</b><br>(marital status, disabilities, education and qualifications data, work experience)           |                                                      |                                                                                                |                                                          |                                                                                                                                                                                                                           |

## C5. Vendor data (natural persons)

| Personal Data Categories                                                                                                     | Purpose                                            | Legal Basis                | Retention Period                                                                                            | Recipients                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|----------------------------|-------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Identification details</b><br>(full name, father's name, mother's name, gender, date of birth, ID number/passport number) | Supply of goods and/or services to the Hotels      | Article 6 para. 1 (b) GDPR | 5 or 20 years based on the respective limitation periods of Articles 250 and 249 of the Hellenic Civil Code | Processors: <ul style="list-style-type: none"> <li>Accounting service providers,</li> <li>providers of IT support services</li> <li>providers of hosting services, cloud providers</li> <li>providers of product and service promotion services</li> </ul>                                         |
| <b>Contact data</b><br>(postal and e-mail address, telephone number)                                                         |                                                    |                            |                                                                                                             |                                                                                                                                                                                                                                                                                                    |
| <b>Transaction data</b><br>(invoices, tax forms, etc.)                                                                       | Compliance with relevant obligations under tax law | Article 6 para. 1 (c) GDPR |                                                                                                             | Financial institutions, to the extent necessary for the execution of transactions<br><br>Tax authorities, in accordance with applicable tax legislation<br><br>Lawyers, in so far as this is necessary for the exercise of the rights of the Hotels and the protection of its legitimate interests |

*\*No automated decision-making processing operation, including profiling is conducted.*

**Data we collect automatically** (e.g. language settings, IP address, location, device settings, device operating system, activity details, time of use, redirect URL, status report, user information (information about browser version), operating system, browsing result (simple visitor or registered customer), browsing history).

## F. Transfer of data outside the EEA

The Hotels transfer data to Carmelon Digital Marketing, based in Israel, to fulfil its purpose of digital marketing, based on its legitimate interest to assign their marketing operations to

external contractors and in accordance with the adequacy decision 2011/61/EU of the European Commission.

### G. What rights do you have in relation to your data and how to exercise them

As clients of the Hotels you have several rights, in accordance with the provisions of Articles 15-22 of the GDPR, in relation to your personal data, which are processed by the Hotels.

The table below lists your rights per processing purpose and corresponding legal basis. In this table you will find detailed information (concept, method and time limits) and form for the exercise of each right.

If you wish to exercise a right or acquire any information concerning the process of your personal data, communicate it via email to the following address [dpo@leonardohotelsgreece.com](mailto:dpo@leonardohotelsgreece.com). It is noted that in case there are reasonable doubts concerning the identity of the data subject, we might request the provision of additional information necessary to confirm the identity.

| PURPOSE                                                                                                                                 | LEGAL BASIS                                       | RIGHTS      |                    |              |                  |                  |                |                                                             |                                |
|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|-------------|--------------------|--------------|------------------|------------------|----------------|-------------------------------------------------------------|--------------------------------|
|                                                                                                                                         |                                                   | Access (15) | Rectification (16) | Erasure (17) | Restriction (18) | Portability (20) | Objection (21) | Objection and human intervention in automated decision (22) | Withdrawal of consent (No 7.3) |
| Provision of hotel and tourism services to Hotels' guests in general (in terms of simple data, e.g. identification and contact details) | Performance of a contract [Article 6 (1)(b) GDPR] | X           | X                  | X            | X                | X                |                |                                                             |                                |



|                                                                                                                         |                                                                            | RIGHTS      |                    |              |                  |                  |                |                                                             |                                |
|-------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------|--------------------|--------------|------------------|------------------|----------------|-------------------------------------------------------------|--------------------------------|
| PURPOSE                                                                                                                 | LEGAL BASIS                                                                | Access (15) | Rectification (16) | Erasure (17) | Restriction (18) | Portability (20) | Objection (21) | Objection and human intervention in automated decision (22) | Withdrawal of consent (No 7.3) |
| Provision of hotel and tourist services (with regard to any health data, e.g. food and accommodation preferences, etc.) | Consent [Article 9 (2)(a) GDPR]                                            | X           | X                  | X            | X                | X                |                |                                                             | X                              |
| Pricing of products/services                                                                                            | Compliance with legal obligation [Article 6 (1)(c) GDPR] + tax legislation | X           | X                  |              | X                |                  |                |                                                             |                                |
| Newsletter                                                                                                              | Consent [Article 6 (1)(a) GDPR]                                            | X           | X                  | X            | X                | X                |                |                                                             | X                              |
| Promotion of products/services to Hotels' guests by electronic means                                                    | Overriding legitimate interest [Article 6 (1)(f) GDPR] + Law               | X           | X                  | X            | X                |                  | X              | X                                                           |                                |

| PURPOSE                                                    | LEGAL BASIS                                            | RIGHTS      |                    |              |                  |                  |                |                                                             |                                |
|------------------------------------------------------------|--------------------------------------------------------|-------------|--------------------|--------------|------------------|------------------|----------------|-------------------------------------------------------------|--------------------------------|
|                                                            |                                                        | Access (15) | Rectification (16) | Erasure (17) | Restriction (18) | Portability (20) | Objection (21) | Objection and human intervention in automated decision (22) | Withdrawal of consent (No 7.3) |
|                                                            | 3471/2006 11.3                                         |             |                    |              |                  |                  |                |                                                             |                                |
| Assessment of candidate employees for recruitment purposes | Overriding legitimate interest [Article 6 (1)(f) GDPR] | X           | X                  | X            | X                |                  | X              | X                                                           |                                |
| Security of property and employee safety                   | Overriding legitimate interest [Article 6 (1)(f) GDPR] | X           | X                  | X            | X                |                  | X              |                                                             |                                |
| Supply of goods and services by vendors to the Hotels      | Performance of a contract [Article 6 (1)(b) GDPR]      | X           | X                  | X            | X                | X                |                |                                                             |                                |

It is noted that the Hotels have the right in any event to refuse partially or fully to comply with your request to restrict the processing or erasure of your data, if the processing or retention of your personal data is necessary for the establishment, exercise or support of its legitimate rights or the fulfilment of its legal obligations.

The Hotels must reply to your request within one (1) month of receipt. This time limit may be extended by a further two months, if necessary, at the discretion of the Hotels, taking into account the complexity of the request and the number of requests, in which case the Hotels will inform you within one month of receipt of the extension in question and of the reasons for the delay.

If the Hotels do not act on your request in the exercise of the above rights or following its reply, you consider that the aforementioned rights have been infringed, you have the possibility to lodge a complaint with the Hellenic Data Protection Authority, 1-3 Kifissias Avenue, 115 23, Athens, <https://www.dpa.gr/>, tel. 2106475600.