PRIVACY POLICY OF CLIENTS

I. General Information

- i) The protection of your Personal Data is a priority for us and we would like to inform you that our company with the name "ATTIKOS HELIOS HOTEL TOURISM COMMERCIAL AND SHIPPING SOCIETE ANONYME" and the distinctive title "ATTIKOS HELIOS A.E." (hereinafter as the "Company") seated in Athens, 19 Amerikis Street, P.C. 10672 with V.A.T. 094542870 and GEMI registration number 003190901000 uses your Personal Data with due diligence. Our Company has prepared this Grand Resort Lagonissi Customer Privacy Policy (hereinafter referred to as the "Policy") in order to inform you, the users of our Website (https://www.lagonissiresort.gr/el/) and the prospect or active customers of Grand Resort Lagonissi (hereinafter referred to as "Customers") regarding the processing of your Personal Data, in accordance with the provisions of Regulation (EU) 2016/679 (hereinafter referred to as the "GDPR"), Law 4624/2019 and the directives and decisions of the Hellenic Data Protection Authority and the competent European institutions (hereinafter referred to as the "Data Protection Legislation").
- ii) This Policy will help you to understand what Personal Data we collect, why we collect them and how we use them and your rights in relation to the protection of your Personal Data. It includes in particular the **Reservations and Additional Services Policy** provided by Grand Resort Lagonissi and the **Conferences and Events/Weddings Policy** as well as the common terms governing the protection of your Personal Data.
- iii) Please note that when you make reservations and we provide you with a conference room in the facilities of Grand Resort Lagonissi for the realization of Conferences or Events/Weddings in general, we do not collect and process the Personal Data of the participants of the above, which are under the responsibility of the organizers, but only of the arrival vehicles (which constitute Personal Data) for security reasons based on the legitimate interest of the Company, which has been fairly balanced with the privacy of the owners of the vehicles. In certain cases specifically requested by the organisers of Conferences or Events/Weddings, our Company processes upon entry to the portal restrictively a list containing the names of the participants based on our Company's legitimate interest in providing such organiser support service.

II. What is our role and contact details?

- i) Our Company acts as the Data Controller for the processing of the Personal Data of its Customers in the context of browsing/using our website and expressing interest in making reservations by you or during your stay at Grand Resort Lagonissi and/or the provision by the Company of other Additional Services.
- ii) For any concerns, questions or complaints you may have regarding the processing of your Personal Data or this Policy, you may contact our Company as follows:
- By telephone at 2103679000
- By sending us an e-mail at dpo@grandresort.gr
- By sending a letter to our address at 19, Americis Street, Athens, P.C. 10672.

1. Reservation and Additional Services Policy

1.1 This extract of the Privacy Policy of Customers relates in particular to the processing of your Personal Data when you browse our Website, express interest in making a reservation, your stay and when you receive other Additional Services provided by Grand Resort Lagonissi.

1.2. Purposes of collection and processing of Personal Data

1.2.1 Our Company collects and processes your Personal Data that is strictly necessary for the fulfilment of the processing purposes detailed below:

PURPOSE OF POCESSING	PERSONAL DATA WE COLLECT AND PROCESS FOR THIS PURPOSE	LEGAL BASIS OF PURPOSING
	Users of the Website	
Navigation on our Website	Cookies Data	Consent Our Company is processing the Cookies Personal Data it collects when you navigate on our Website based on your consent provided according to your choices on the Cookie Banner. You can learn more details regarding the use of cookies by our Cookie Policy on our Website.
	Prospect Customers	
Manage interest for booking room/suite - For communication and management of the room/suite reservation enquiry	Identification data (Name, Surname) Communication data (e-mail, telephone number) Booking data (dates of booking/check in - check out, number of accompanying persons, age of minors)	Pre-contractual stage of contract performance Our Company processes your Personal Data at a pre-contractual stage when you express your interest to make a reservation at Grand Resort Lagonissi and receive our services.
- To contact you when you fill in the contact form posted on our Website	Identification data (Name, Surname) Communication data (e-mail, telephone number) Address data Country data Message data	Consent Our Company processes your e-mail in order to reply to the message you have entered when you fill in the contact form posted on our website or to inform you about our news or new services when you subscribe to our newsletter on your own initiative and based on your consent. You have the possibility to withdraw your consent by selecting the unsubscribe link on each of our communications.
- To communicate with you when you send us a message via social media	Social media pseudonym data Message data	Consent

		Our Company processes your data based on your consent to contact us by sending a message via social media. If you do not wish us to respond to you through the use of social media communication channels, you have the option to withdraw your consent.
3. Commercial communication- For sending newsletter	Communication data (e-mail)	Consent Our Company processes your Personal Data in order to inform you about our news or new services when you subscribe on your own initiative to its newsletter based on your consent. You have the option to withdraw your consent by selecting the unsubscribe link in each of our communications.
		Legitimate interest We collect your Personal Data through third parties by entering into appropriate data processing agreements and send you our news or new services based on our legitimate interest, which is fairly balanced with your privacy. You can opt out of receiving our newsletter by selecting the unsubscribe link that appears in every communication.

4. Participation in competitions via social media or other promotional activities

Identification data (Name, Surname) Social media account data Communication data (e-mail, phone number) Contest or promotion data

Consent

In case you wish to participate in a Contest that we conduct through social media or other promotional activities on your own initiative, our Company processes your Personal Data based on your consent which you provide us when you disclose your data to us, in accordance with the terms of each Contest or promotional activity.

In case you disclose third party data to us, by communicating them to us, you declare that you have collected and consented to their sending to our Contest/Promotion.

You have the option to withdraw your consent at any time for the future.

Customers

Identification data

5. When you book a room/suite

- For the management of the booking and the implementation of the hotel service contract
- To facilitate bookings (changes, adherence to booking procedures, etc.)
- For the management of deposits
- For communication in the context of managing the booking of a room/suite

(name, surname, ID number, passport (and place of issue)) Nationality data Date of birth Contact details (e-mail, telephone, mobile phone) Address data (address, country, postal code) Financial transaction data (credit/debit card details, advance payment, etc.) Booking data (booking days, room number, check in - check out, charges, number of accompanying persons, age of minors) Preference data (accommodation preferences, personal preferences) Identification data (name, surname) Booking data (booking days, check in - check out, charges, number of accompanying persons)

Execution of the contract

Our Company processes your Personal Data pursuant to the contract that has been informally concluded between us for the provision of hotel services on the premises of Grand Resort Lagonissi and for the fulfilment of our Company's obligations under the said contract.

6. Booking room/suite through third parties

- For the management of bookings made through digital booking platforms or travel agencies

Legitimate interest

Our Company processes your Personal Data during the interconnection of the systems of digital booking platforms or their disclosure by travel agencies in the context of the execution of the contract

Address data (Country)

		with the above entities when room/suite through third parties.
	Communication data (e-mail, telephone)	Consent If you choose on your own initiative to provide us with your e-mail and telephone data when making reservations through third parties, we process your Personal Data on the basis of your consent. You may withdraw your consent at any time. The withdrawal of consent is valid for the future.
- For the issue of the required advance tax documents	Taxation data	Compliance with legal obligation Our Company processes your Personal Data that is necessary in the context of fulfilling our legal obligations regarding the management and maintenance of the advance accommodation tax data resulting from the hotel service contract.
7. Accommodation - For the management of the Customer's accommodation - For the management of accommodation payments - For communication in the context of the stay	Identification data (name, surname,ID number) Communication data (e-mail, telephone number) Postal address data (City, Address, Postal Code, Country) Financial transaction data (credit/debit card details, advance payment, outstanding debts, payment, etc.) Booking data (booking/check in - check out dates, booking days, charges, discount codes, number of accompanying persons, age of children, room number)	Execution of the contract Our Company processes your Personal Data under the hotel service contract concluded between us.
- For the issuance of the required tax documents/invoices for the stay	Taxation data	Compliance with a legal obligation Our Company processes your Personal Data that is necessary in the context of fulfilling our legal obligations regarding the management and maintenance of the accommodation tax data resulting from the hotel service contract.

- For the management of Customer preferences	Important dates: birthdays, anniversaries and special occasions Data on dietary preferences or allergies	Consent and Express Consent Your consent to the processing of important dates that you notify us of on your own initiative as well as your dietary preference or allergy data in combination with your explicit consent to the processing of your special category of personal data on dietary preferences or allergies.
- To provide benefits and rewards to our Customers	Data from previous stays	Legitimate interest We process your Personal Data of your previous stays to reward you and provide you with benefits based on the legitimate interest of our Company in order to satisfy the Customers who repeatedly choose to stay at Grand Resort Lagonissi.
- To protect persons and property through the use of CCTV	Image/video data	Legitimate interest Our Company processes your Personal Data through the installation and use of a CCTV system for your personal protection and for the protection of property, as specifically described in the text of the Second Level Notice
8.Provision of special services - For the provision of SPA services	Medical Questionnaire data	Consent and Explicit consent We are based on your consent in combination with the exception of the explicit consent to the processing of your Personal Data when you fill in our Medical Questionnaire that we will provide you with during your visit to the SPA, in order to receive the SPA services of Grand Resort Lagonissi, which constitute special category/health data in their entirety.
- For your reservations at the restaurant of Grand Resort Lagonissi	Identification data (name,surname) Communication data (e-mail and/or telephone number)	Performance of a contract We process your Personal Data or in order to manage your reservation at the Grand Resort Lagonissi restaurant in order to provide you with restaurant services.

- For the participation of your children in the Kids Club	Child identity data Child age data Data on dietary preferences or allergies	Consent and Explicit consent We process the Personal Data of your children for their participation in Kids Club when you choose to enroll your children in Kids Club, based on your consent subject to the exception of explicit consent for the processing of special category data on dietary preferences or allergies.
9.Commercial communication - For sending newsletter	Communication data (e-mail)	Legitimate interest Our Company processes your e-mail that you notify to us during your stay at Grand Resort Lagonissi when you are already our customers or when you receive our services in any way, in order to send you newsletters about our news and new services, based on its legitimate interest which is balanced against your privacy in a fair manner, without prejudice to your fundamental rights and freedoms. You can opt out of receiving our newsletter by selecting the unsubscribe link that appears in every communication.

It is noted that:

- 1.2.2. Your **credit card data** are collected and kept in encrypted form during your stay in order to make the required charges and are deleted/destroyed after your departure from Grand Resort Lagonissi.
- 1.2.3. For the **other services** that our Company facilitates you to receive (such as but not limited to Limousine Service & Car Rental, Leisure Boat Rental, Private Sightseeing & Guided Tours, Private Jet Service, Boat Excursions etc.) provided by third parties, Our Company does not process your Personal Data in the context of the provision of such services but may process your Personal Data of your identity, room number and contact details in order to facilitate your receipt of such services from third parties, based on the legitimate interest of our Company in the context of the proper organization and administration of the additional services provided by third parties.
- 1.2.4 During the provision of **medical services** either by the present doctor in the facilities of Grand Resort Lagonissi or by the externally cooperating doctor with our Company, we do not collect and do not process special category data but we disclose to the doctor the full name and the room and/or mobile phone number of the Customer interested in receiving the relevant services based on the legitimate interest of our Company in the context of the proper organization and administration of the support of the additional services provided at Grand Resort Lagonissi.
- 1.2.5 When making reservations or providing baby-sitting services, **no Personal Data of minors are collected**, but only their age.

- 1.2.6 Our Company may process your Personal Data in the context of exercising or defending its legitimate claims based on its overriding **legitimate interest**.
- 1.2.7 Some of your Personal Data may be processed on the basis of our **legitimate interest** and our Company's compliance with its **legal obligation** for other purposes, such as when we receive documents, requests, orders, writs, warrants, etc. third legal authorities or bodies, such as supervisory, prosecutorial, judicial, tax authorities, to investigate crimes and to protect you against fraud or to fight against all forms of crime and offences.
- 1.2.8 Where the legal basis for the processing of your Personal Data is the **legitimate interest** of our company, you may object to the processing by contacting the Company at dpo@grandresort.gr.
- 1.2.9 Where the legal basis for the processing of your Personal Data is **consent**, if you withdraw your consent, the **withdrawal** of your consent is valid for the future, in which case your Personal Data will be deleted. The processing of your Personal Data on the basis of your consent, up to the point of withdrawal of your consent, is carried out lawfully.
- 1.2.10. Regarding the processing of your Personal Data during your participation in the Leaders Club, our Website simply provides the possibility to redirect to the Leaders Club environment and the relevant terms of use and privacy policy apply, while our Company does not collect and process your Personal Data in this context.

2. Conference and Events/Weddings Policy

- 2.1 This extract from the Customer Privacy Policy relates specifically to the processing of your Personal Data when providing a room for the holding of Conferences or other Events/Weddings.
- 2.2 Our Company collects and processes your Personal Data that is absolutely necessary for the fulfilment of the processing purposes detailed below and related to the provision of a room for the holding of Conferences or other Events/Weddings by third party organisers.

PURPOSE OF POCESSING	PERSONAL DATA WE COLLECT AND PROCESS FOR THIS PURPOSE	LEGAL BASIS OF PURPOSING
	Prospect Customers	
Management of expressions of interest Conference, Event/Wedding organisation - For the communication and management of the investigation of the organisation of a Conference or Event/Wedding	Identification data (name, surname) Communication data (e-mail, telephone number) Conference, Event/Wedding date data	Pre-contractual stage of contract performance Our Company processes your Personal Data at the pre-contractual stage when you express your interest in holding the Conference or Event/Wedding at the Grand Resort Lagonissi on its premises.
2.Commercial communication	Communication Data (e-mail)	Consent Our Company processes your Personal Data when you enter it to inform you

- For sending newsletter		about our news or new services, when you subscribe on your own initiative to its newsletter based on your consent. You are able to withdraw your consent by selecting the unsubscribe link that appears in every communication. Legitimate interest We process your Personal Data through third parties with whom we have entered into appropriate data processing agreements and send you our news or new services based on our legitimate interest, which is fairly balanced with your privacy. You are able to opt out by selecting the unsubscribe link that appears in every communication.
	Customers	
3.Provision of a room for a Conference, Event/WeddingTo manage your optionsFor communication in the context of the event	Identification data (name, surname) Communication data (e-mail, telephone number) Financial transaction data (credit/debit card details, advance payment, etc.) Options data	Execution of a contract Our Company processes your Personal Data pursuant to the contract that has been informally concluded between us for the provision of a Conference or Event/Wedding room at the premises of Grand Resort Lagonissi and for the fulfilment of our Company's obligations arising from the said contract.
- For the issue of the required tax documents	Taxation data	Compliance with a legal obligation Our Company processes your Personal Data that is necessary in the context of fulfilling our legal obligations regarding the management and maintenance of tax data resulting from the provision of a room for the holding of Conferences or Events/Weddings.
4.Commercial communication - For sending newsletter	Communication Data (e-mail)	Legitimate interest Our Company processes your e-mail that you communicate to us during Conferences or Events/Weddings in order to send you its news as well as to inform you about its special offers based on the legitimate interest of our Company

	which has been fairly balanced with your privacy.
	You have the possibility to opt-out by selecting the unsubscribe link available in each of our communications.

- 2.2.Please note that our Company does not collect and process your image data through the use of cameras or photographs in the context of the realization of the Conferences or Events/Weddings but professional photographers are appointed by the respective organizers.
- 2.3 Otherwise, the provisions of paragraphs 1.2.2. to 1.2.9. above shall apply.

III. Data retention period

We will retain your Personal Data for as long as necessary to fulfil the processing purposes described above. In addition, we will retain your Personal Data in accordance with the applicable legislation governing hotel service providers. Personal Data will be deleted or destroyed immediately after the purposes for which it is held have been fulfilled.

Indicatively it is noted that: a) the Personal Data of children participating in the Kids Club are destroyed immediately after the end of participation, b) the Personal Data included in the list of participants in Conferences or Events/Weddings are destroyed immediately after the end of the respective event, c) the credit card details are deleted immediately after the payment of the stay at Grand Resort Lagonissi.

IV. Rights

i) You may exercise your rights by sending the completed <u>Data Subject's Rights Request Form</u> to dpo@grandresort.gr or by contacting us using the contact details provided in section II of this Policy. The table below sets out your rights regarding the protection of your Personal Data under the GDPR and their respective explanations:

Right	What is it?
Access	You can ask us to: - confirm that our Company processes your Personal Data - to obtain access to the data we process and to request a copy of your data obtain relevant information about our processing, such as: what data our Company holds, why it uses it, who it transfers it to, whether it transfers it to third countries, how it protects it, how long it keeps it, what rights you have, how we can lodge a complaint, where it collected it from in case it did not collect it from you.
Rectification	You may request our Company to correct your incorrect or inaccurate data or to update it. In this context, our Company reserves the right to verify the accuracy of the data before making the correction and is obliged to inform the recipient to whom the Personal Data was disclosed, unless this proves to be impracticable or involves a disproportionate effort.
Erasure	You can request that your data be deleted when: 1. you have withdrawn your consent on which the processing was based

2. they are no longer needed for the purposes for which they were collected 3. where you find that they are otherwise or unlawfully processed 4. if you object to the processing Our Company reserves the right to refuse to exercise the above right if the processing of the data is necessary: a) for the purpose for which it was collected. b) for the purpose for which the data are intended; b) to comply with a legal obligation. c) for the establishment, exercise or defence of legal claims. The erasure will be fulfilled when the above conditions are met. You may request our Company to exercise the right to restrict processing, Restriction i.e. to retain but not use your Personal Data, when: processing 1. their accuracy is questioned, so that you can verify their accuracy 2. the processing is unlawful but you do not wish to have it deleted 3. the processing of the data is no longer necessary for the purposes for which it was collected, but our company still needs it to establish, exercise or defend legal claims 4. you object to its processing and are awaiting verification of its effect, i.e. whether our Company's legitimate grounds prevail over your legitimate claims. You have the right to ask our Company to provide you with your Personal **Portability** Data in a structured form or you can request that it be transferred directly to another controller. A prerequisite is that the data has been provided with consent or in the context of contract performance and also that the data is held by automated means and not in paper form. A further condition is that the data must have been provided by you and does not apply to the case in which the data have been inferred by our company on the basis of data provided by you. You may object at any time to any processing of your Personal Data, which Object has a legal basis of legitimate interest, including in the case of profiling. If you exercise this right, our Company will have to demonstrate compelling legitimate grounds which override your rights and freedoms or which relate to the establishment, exercise, or maintenance of legal claims in order to continue such processing. Our Company does not make decisions using a technical means by which human Right to your personal aspects are evaluated and decisions are made solely on the intervention basis of automated processing that produces legal effects on you or significantly affects you in a similar way. Nor does it profile you through automated processing of Personal Data without human intervention. You are hereby informed that you have the right to request human intervention in decision-making through automated processing and to express your views on the decision. You have the right to submit your complaints or a complaint to the local Supervisory supervisory authority about our processing of personal data. In Greece, the authority/Alternative supervisory authority for data protection is the Hellenic Data Protection Authority -www.dpa.gr/.

forms of dispute resolution

As the protection of your Personal Data is a priority for our Company, you can contact our Company at any time and with our Company for any issue or complaint regarding the processing of your Personal Data.

In addition, our Company suggests that you choose alternative dispute resolution - mediation as a more flexible means of resolving disputes between you and our Company.

ii) Procedure for exercising your rights

- **Identification:** We aim to maintain a high level of confidentiality of all records held by our Company that contain Personal Data, therefore we reserve the right to ask you for some information to prove your identity if you make a request to exercise your rights in relation to those records.
- **Specific requests:** Your request must include specific and true information and/or facts in order for us to respond and/or fulfill it accurately. Otherwise, our Company reserves the right to reject requests that are unfounded, excessive, abusive or illegal.
- **Timelines:** We will respond to your valid and accurate requests within one (1) month of receiving them, unless they are particularly complex or a large number of your requests have been submitted together. If we need more time to respond to your request, we will notify you in this regard within the month and in any case our response will not exceed three (3) months.
- **Cost:** We will not charge you a cost for exercising your rights in relation to your Personal Data unless, as provided by law, your request for access to information is unfounded or excessive, in which case we are entitled to charge a reasonable fee in the circumstances. In any event, we will inform you of any charges before we complete your request.
- **Contact**: you can contact us at the details mentioned above in point II.ii) and submit your comments, questions, remarks or any complaints regarding this Policy and the general collection and processing of your Personal Data.

V. Recipients of your Personal Data

- i) In the context of the proper operation of our website, reservations and the organization and administration of the Grand Resort Lagonissi Hotel, our Company cooperates with third companies/partners or suppliers, who gain access only to as much data as is absolutely necessary.
- ii) The selection of our partners and suppliers (individuals or companies) is based on the essential competence and a high level of professionalism and an appropriate level of protection of Personal Data. Our Company selects its partners or suppliers based on the criteria of providing appropriate technical and organizational quarantees for the protection and security of Personal Data.
- iii) In some cases our Company's partners are independent Data Controllers (such as providers of special services that you wish to receive in connection with your stay at Grand Resort Lagonissi and that our Company facilitates you to receive by contacting them). In addition, our Company may transfer your Personal Data to third party recipients as separate Data Controllers, when required by law or in the context of its proper administration and operation (for example, but not limited to, public bodies and authorities as well as the lawyers we work with and the occupational physician). In cases where our Company transfers your Personal

Data to separate Data Controllers as recipients, they are themselves responsible for lawful processing of our data under their own protection policies.

- iv) In the context of cooperation with our suppliers, our Company enters into the relevant data processing contracts for this purpose in accordance with the GDPR and the Data Protection Legislation in their capacity as Processors or joint controllers as the case may be.
- v) In particular, therefore, our Company may transfer your Personal Data to the following categories of recipients on a case-by-case basis:
- a. Providers of specialised services
- b. Technology service providers, technical companies creating and hosting websites and digital booking platforms
- c. Public Authorities and Bodies
- d. Judicial, police, prosecution or other authorities in accordance with the applicable legislation and by virtue of a legal mandate. In the event of a legal order, official order or official preliminary investigation, our Company has the right to make the relevant data available to the relevant authority without any further action.
- e. Associated law firms or lawyers
- f. Bailiffs, notaries
- g. Physician/Doctor
- vi) Please note that when we cooperate with third party booking platforms, not all of your data collected through them are forwarded to us, but only those necessary for the realization of your booking, as indicated in the table in paragraph 1.2.1 in section 6 as B2B, in the framework of our agreement with these platforms. For the processing of your Personal Data through these digital platforms, their respective terms and policies apply. Our Company obtains your Personal Data necessary for your stay when you complete the Registration Form at the start of your stay.

VI. Data transfers

Our Company generally stores your Personal Data on servers located within the European Economic Area (EEA). If data is to be transferred to third countries outside the European Economic Area, it is mainly transferred to a country that has an adequacy decision or is part of the US Data Privacy Framework. If our Company needs to transfer your Personal Data to third countries for which there is no adequacy decision of the European Commission or to International Organizations, all appropriate safeguards provided for in the applicable Greek and European legislation for the protection of personal data and in the decisions and directives of the competent European bodies for the protection of personal data regarding transfers to third countries as well as appropriate contractual, technical and organizational measures will be taken.

VII. Data security

- i) The Company takes all necessary technical and organizational security measures to protect and ensure the confidentiality of your Personal Data.
- ii) Our Company selects entities with equivalent professional qualifications that provide sufficient guarantees in terms of technical knowledge and personal integrity to protect your Personal Data. Your Company, through

both its respective contractual commitments and its partners and suppliers, takes all necessary security measures to protect and ensure the privacy, confidentiality and integrity of Personal Data.

iii) In any case, the security of those in the environment of the Website or booking page is subject to events beyond its sphere of influence, as well as errors due to technical or other network weaknesses beyond the Company's control or reasons of force majeure or fortuitous events.

VIII. Amendments to this Policy

- i) Our Company reserves the right to amend this Policy at its discretion when the procedures it follows in the provision of its services or the applicable legislation are amended. Amendments to this Policy shall take effect from the date of their posting on the Grand Resort Lagonissi website. We therefore recommend that you frequently visit this section of our website, where this Policy is displayed, in order to keep yourself informed of any changes.
- ii) However, if you wish to obtain any clarification or information regarding the changes or have any dispute, reservation or question regarding the amendments to this document, you may contact us. Please note that any information/clarification provided to you pursuant to the above regarding the possible changes to this Policy shall not constitute a replacement, substitution or any amendment to this Policy.