

# “Semeli Group”

## GLOBAL PRIVACY STATEMENT

The [Semeli group](#) ☐, which includes Stamatia Zisimopoulou S.A., G. Zisimopoulos and Iraklis Z. O.E and Evgenia Zisimopoulou I.K.E. (formerly known as Semeli hotel, Semeli bar, MykonosView Hotel, Oniro Bar-restaurant, Krama Restaurant, Thioni Restaurant, Baos Bar, My plate, Toy Room Mykonos, Mykonos Bar) and their affiliates, values you as our guest and recognizes that privacy is important to you. We want you to be familiar with how we collect, use and disclose data.

This Privacy Statement describes the privacy practices of the Semeli Group for data that we collect:

- through websites operated by us from which you are accessing this Privacy Statement, including semelihotel.gr and other websites owned or controlled by the Semeli Group (collectively, the “**Websites**”)
- through the software applications made available by us for use on or through computers and mobile devices (the “**Apps**”)
- through our social media pages that we control from which you are accessing this Privacy Statement (collectively, our “**Social Media Pages**”)
- through HTML-formatted email messages that we send you that link to this Privacy Statement and through your communications with us
- when you visit or stay as a guest at one of our properties, or through other offline interactions

Collectively, we refer to the Websites, the Apps and our Social Media Pages, as the “**Online Services**” and, together with offline channels, the “**Services.**” By using the Services, you agree to the terms and conditions of this Privacy Statement.

### Privacy Preferences

At Semeli, we respect your privacy and want to provide you with the options, information, and choices below to express your preferences: what and how much you share with us and when and how you hear from us.

*Collection of Personal Data* “*Personal Data*” are data that identify you as an individual or relate to an identifiable individual.

At touch points throughout your guest journey, we collect Personal Data in accordance with law, such as:

- Name
- Gender

- Postal address
- Telephone number
- Email address
- Credit and debit card number or other payment data
- Financial information in limited circumstances
- Language preference
- Date and place of birth
- Nationality, passport, visa or other government-issued identification data
- Important dates, such as birthdays, anniversaries and special occasions
- Membership or loyalty program data (including co-branded payment cards, travel partner program affiliations)
- Employer details
- Travel itinerary, tour group or activity data
- Prior guest stays or interactions, goods and services purchased, special service and amenity requests
- Geolocation information
- Social media account ID, profile photo and other data publicly available, or data made available by linking your social media and loyalty accounts

In more limited circumstances, we also may collect:

- Data about family members and companions, such as names and ages of children
- Biometric data, such as digital images
- Images and video and audio data via: (a) security cameras located in public areas, such as hallways and lobbies, in our properties; and (b) body-worn cameras carried by our loss prevention officers and other security personnel
- Guest preferences and personalized data (“**Personal Preferences**”), such as your interests, activities, hobbies, food and beverage choices, services and amenities of which you advise us or which we learn about during your visit

If you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

### **How We Collect Personal Data**

We collect Personal Data in a variety of ways:

- **Online Services.** We collect Personal Data when you make a reservation, purchase goods and services from our Websites or Apps, communicate with us, or otherwise connect with us or post to social media pages, or sign up for a newsletter or participate in a survey, contest or promotional offer.
- **Property Visits and Offline Interactions.** We collect Personal Data when you visit our properties or use on-property services and outlets, such as restaurants, concierge services, health clubs, child care services, and spas. We also collect

Personal Data when you attend promotional events that we host or in which we participate, or when you provide your Personal Data to facilitate an event.

- **Customer Care Centers.** We collect Personal Data when you make a reservation over the phone, communicate with us by email, fax or via online chat services or contact customer service. These communications may be recorded for purposes of quality assurance and training.
- **Physical & Mobile Location-Based Services.** We collect Personal Data if you download one of our Apps or choose to participate in certain programs. For example, we may collect the precise physical location of your device by using satellite, cell phone tower, Wi-Fi signals, or other technologies. We will collect this data if you opt in through the App or other program (either during your initial login or later) to receive the special offers and to enable location-driven capabilities on your mobile device. If you have opted-in, the App or other program will continue to collect location data when you are in or near a participating property until you log off or close application (i.e., the App or other program will collect this data if it is running in the background) or if you use your phone's or other device's setting to disable location capabilities for the Semeli Hotel App or other program.

**Collection of Other Data** “*Other Data*” are data that generally do not reveal your specific identity or do not directly relate to an individual. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data. Other Data include:

- Browser and device data
- App usage data
- Data collected through cookies, pixel tags and other technologies
- Demographic data and other data provided by you
- Aggregated data

### **How We Collect Other Data**

We collect Other Data in a variety of ways:

- **Your browser or device.** We collect certain data through your browser or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services (such as the Apps) you are using. We use this data to ensure that the Online Services function properly.
- **Your use of the Apps.** We collect certain data when you download and use an App, such as App usage data, the date and time the App on your device accesses our servers and what data and files have been downloaded to the App based on your device number.
- **Cookies.** We collect certain data from cookies, which are pieces of data stored directly on the computer or mobile device that you are using. Cookies allow us


to collect data such as browser type, time spent on the Online Services, pages visited, referring URL, language preferences, and other aggregated traffic data. We use the data for security purposes, to facilitate navigation, to display data more effectively, to collect statistical data, to personalize your experience while using the Online Services and to recognize your computer to assist your use of the Online Services. We also gather statistical data about use of the Online Services to continually improve design and functionality, understand how they are used and assist us with resolving questions.

Cookies further allow us to select which advertisements or offers are most likely to appeal to you and display them while you are using the Online Services or to send marketing emails. We also use cookies to track responses to online advertisements and marketing emails.

If you do not want data collected with cookies, you can learn more about controlling cookies at: <http://www.allaboutcookies.org/manage-cookies/index.html> . You can choose whether to accept cookies by changing the settings on your browser or by managing your tracking preferences by clicking on “**Tracking Preferences**” located at the bottom of our home page. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Online Services. For example, we will not be able to recognize your computer, and you will need to log in every time you visit. You also will not receive advertising or other offers from us that are relevant to your interests and needs. At this time, we do not respond to browser “Do-Not-Track” signals.

- **Pixel Tags and other similar technologies.** We collect data from pixel tags (also known as web beacons and clear GIFs), which are used with some Online Services to, among other things, track the actions of users of the Online Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Online Services.
- **Analytics.** We collect data through Google Analytics and Adobe Analytics, which use cookies and technologies to collect and analyze data about use of the Services. These services collect data regarding the use of other websites, apps and online resources. You can learn about Google’s practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) and opt out by downloading the Google Analytics opt out browser add-on, available at <https://tools.google.com/dlpage/gaoptout> . You can learn more about Adobe and opt out by visiting <http://www.adobe.com/privacy/opt-out.html> .
- **Adobe Flash technology (such as Flash Local Shared Objects (“Flash LSOs”)) and other similar technologies.** We collect data through Flash LSOs and other technologies on some Websites to, among other things, collect and store data about your use of the Online Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the [Website Storage Settings Panel](#) at

[http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html). You can also control Flash LSOs by going to the **Global Storage Settings Panel** at

[http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager03.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager03.html) and following the instructions (which include instructions that explain, for example, how to delete existing Flash LSOs (referred to as “information” on the Macromedia site), how to prevent Flash LSOs from being placed on your computer without you being asked, and (for Flash Player 8 and later) how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including those used with the Online Services. For more information, please refer to <https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html> .

- **IP Address.** We collect your IP address, a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services. We also may derive your approximate location from your IP address.

**Aggregated Data.** We may aggregate data that we collected and this aggregated data will not personally identify you or any other user.

**Use of Personal Data and Other Data** We use Personal Data and Other Data to provide you with Services, to develop new offerings and to protect the Semeli Group and our guests as detailed below. In some instances, we will request that you provide Personal Data or Other Data to us directly. If you do not provide the data that we request, or prohibit us from collecting such data, we may not be able to provide the requested Services.

We use Personal Data and Other Data for our legitimate business interests, including the following:

**Provide the Services you request.** We use Personal Data and Other Data to provide Services you request, including:

- To facilitate reservations, payment, send administrative information, confirmations or pre-arrival messages, to assist you with meetings and events and to provide you with other information about the area and the property at which you are scheduled to visit
- To complete your reservation and stay, for example, to process your payment, ensure that your room is available and provide you with related customer service
- To support our electronic receipt program. When you provide an email address in making a reservation, we use that email address to send you a copy of your

bill. If you make a reservation for another person using your email address, that person's bill will be emailed to you, as well. You can opt out of receiving your bill via email and instead receive a paper copy by contacting the front desk

We will use Personal Data and Other Data to manage our contractual relationship with you, because we have a legitimate interest to do so and/or to comply with a legal obligation.

**Personalize the Services according to your Personal Preferences.** We use Personal Data and Other Data to personalize the Services and improve your experiences, including when you contact our call center, visit one of our properties or use the Online Services, to:

- Customize your experience according to your Personal Preferences
- Present offers tailored to your Personal Preferences

We will use Personal Data and Other Data to provide personalized Services according to your Personal Preferences either with your consent or because we have a legitimate interest to do so.

**Communicate with you about goods and services according to your Personal Preferences.** We use Personal Data and Other Data to:

- Send you marketing communications and promotional offers, as well as periodic customer satisfaction, market research or quality assurance surveys

We will use Personal Data and Other Data to communicate with you with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.

**Loyalty Programs.** We use Personal Data and Other Data to:

- Offer and manage your participation in our global loyalty programs, as well as others that are specific to certain properties or tailored to your interests
- Send you offers, promotions and information about your account status and activities
- Assess your benefits
- Administer points earned through co-branded credit cards
- Manage your choices regarding how you wish to earn, track and use your points

We will use Personal Data and Other Data in this way with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.

- **Sweepstakes, activities, events and promotions.** We use Personal Data and Other Data to allow you to participate in sweepstakes, contests and other promotions and to administer these activities. Some of these activities have

additional rules and may contain additional information about how we use and disclose your Personal Data. We suggest that you read any such rules carefully.

We use Personal Data and Other Data in this way with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.


- **Business Purposes.** We use Personal Data and Other Data for data analysis, audits, security and fraud monitoring and prevention (including with the use of closed circuit television, card keys, and other security systems), developing new goods and services, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

We use Personal Data and Other Data in this way to manage our contractual relationship with you, comply with a legal obligation and/or because we have a legitimate interest to do so.

***Disclosure of Personal Data and Other Data.*** Our goal is to provide you with the highest level of hospitality and Services, and to do so, we share Personal Data and Other Data with the following:

- **Semeli Group.** We disclose Personal Data and Other Data to other companies within the [Semeli Group](#) for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you, facilitating the loyalty programs, and to accomplish our business purposes. Stamatia Zisimopoulou S.A. is the party responsible for the management of the jointly-used Personal Data. We share your Personal Data and Other Data used for making a reservation with the applicable property to fulfill and complete your reservation.
- **Strategic Business Partners.** We disclose Personal Data and Other Data with select Strategic Business Partners who provide goods, services and offers that enhance your experience at our properties or that we believe will be of interest to you. By sharing data with these Strategic Business Partners, we are able to make personalized services and unique travel experiences available to you. For example, this sharing enables spa, restaurant, health club, concierge and other outlets at our properties to provide you with services. This sharing also enables us to provide you with a single source for purchasing packages that include travel-related services, such as airline tickets, rental cars and vacation packages.
- **Service Providers.** We disclose Personal Data and Other Data to third-party service providers for the purposes described in this Privacy Statement. Examples of service providers include companies that provide website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing and other services.
- **Corporate Reorganization.** We may disclose or transfer your Personal Data and Other Data to a third party in the event of any reorganization, merger, sale,

joint venture, assignment, transfer or other disposition of all or any portion of the Semeli Group business, assets or stock (including any bankruptcy or similar proceedings).

- **Other Uses and Disclosures** We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of the Semeli Group, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- We may use and disclose Other Data for any purpose, except where we are not allowed to under applicable law. In some instances, we may combine Other Data with Personal Data (such as combining your name with your location). If we do, we will treat the combined data as Personal Data as long as it is combined. In addition, we are not responsible for the data collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Data you disclose to other organizations through or the Apps or our Social Media Pages.
- **Third Party Advertisers** We may use third-party advertising companies to serve advertisements regarding goods and services that may interest you when you access and use the Online Services, other websites or online services. To serve such advertisements, these companies place or recognize a unique cookie on your browser (including through use of pixel tags). If you would like more information about this practice, and to learn about your choices in connection with it, please visit [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) and <http://www.aboutads.info/>. To opt out of the practice, you may download the AppChoices app at [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices) .

**Security** We seek to use reasonable organizational, technical and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us at [admin@semelihotel.gr](mailto:admin@semelihotel.gr)