

PRIVACY NOTICE TO GUESTS

Definitions

"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;

"Special categories of personal data" means the Personal Data referring to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning sex life or sexual orientation;

"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, organization, structuring, storage, adaptation or alteration, retrieval, use, disclosure, alignment, restriction, erasure;

"consent" of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he/she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her;

"Data 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;

"Data Processor" means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller;

"European Economic Area ("EEA")": EU Member States plus Norway, Iceland and Lichtenstein.

PRIVACY NOTICE TO GUESTS

1. Introduction

This is a Privacy Notice to Guests (hereinafter the “Notice”) made by “NISSIBLU HOTEL”, of T & E TTOFINIS ESTATES LTD (hereinafter “the Company” or “we” or “us”). We are dedicated to protecting your privacy and safeguarding your personally identifiable information (hereinafter “Personal Data”) whenever you are staying in the hotel (hereinafter “Guest” or “you” or “your”). We are committed to respecting your privacy and adhering to the principles of applicable data protection and privacy laws.

This Notice contains information in accordance with Article 13 of the General Data Protection Regulation (Regulation EU 2016/679 – GDPR), regarding the processing of your Personal Data by The company and by the Hotel Owner as independent Data Controllers, each one processing your Personal Data separately for the purpose of conducting its business activities, providing its services, performing contractual obligations and complying with legal obligations.

For more information on how the company processes personal data, we refer you to the company’s Privacy Policy and Privacy Notice to Guests published on the company’s website www.nissiblu.com

For more information on how the Hotel processes personal data, kindly contact the Hotel as per section 9 below to inform you about its Privacy Policy.

2. What personal data we collect in relation to you

We collect and use your Personal Data as a Guest of the Hotel. We generally collect your Personal Data directly from you, but in some cases, we may collect your Personal Data from other sources.

Types of Personal Data which we collect during your stay at the Hotel include among other the following: (i) your full name, home, professional and email addresses, telephone number, ID and Passport numbers, Tax Identification Number, nationality, country of residence, date of birth, gender, marital status and occupation; (ii) details of your stay, such as arrival and departure dates, type of room, room preference, full names, dates of birth and passport numbers of companions, purpose of visiting (e.g. vacation, business, conference etc.), special occasions, specific requests to the Hotel (e.g. health conditions that require special room accommodations, any special dietary, religious or disability requests), food and beverage preferences during your stay, food and beverage consumptions in-room and within the Hotel, bills details; (iii) details of complaints, incidents, illness, accident during your stay at the Hotel and details of claims and other remarks you may have.

In the course of your reservation or your stay at the Hotel you provide Personal Data to us such as full names, dates of birth, passport numbers, any special dietary, religious or disability requests health data about other individuals such as your companions. By providing such information, you represent and warrant to us that you have obtained such individuals’ permission to so do and that such individuals are aware of, understand and accept our Privacy Policies and this Notice.

In some cases we will receive your Personal Data from other sources such as: (a) the Hotel when you make a reservation directly at the Hotel or a business partner, travel agent or tour operator when you make a reservation through them; and (b) your insurance company, their agents, doctors, your companions may disclose or share personal data or relevant medical/health data

(special categories of personal data) with us in case of an accident/injury/an emergency situation on your behalf.

3. Purposes for collection and processing

The company collects and processes your Personal Data for the following purposes: (i) performing a contract or transaction such as handling your stay at the Hotel and performing the management contract with the Hotel Owner; (ii) better understanding of your interests and preferences and offering to you a unique experience during your stay; (iii) to comply with obligations imposed by law or regulations; (iv) handling your remarks, complaints, incidents, illnesses, accidents and claims during your stay or after your departure; and (v) managing and improving our products, services, programs, various types of communications, advertising campaigns, and/or promotional activities, our day-to-day operations and your hotel experience.

The Hotel collects and processes your Personal Data for the following purposes: (i) to perform its obligations under your Hotel accommodation contract and under the management agreement with The company and (ii) to comply with obligations imposed by law or regulations on the Hotel.

4. Legal basis for processing your Personal Data

We are committed to collecting and processing your Personal Data in accordance with applicable data protection laws. We will only process your Personal Data if at least one of the following conditions applies: (a) you have given us your consent; or (b) processing is necessary: (i) for the performance of a contract with you or to take steps at your request prior to entering into a contract; (ii) for compliance with a legal obligation; (iii) to protect your vital interests or of another individual; (iv) it is in the public interest or in the exercise an official authority we have; (v) for the purposes of our or a third party's legitimate interests and these are not overridden by your interests or fundamental rights.

5. Who might we share your Personal Data with?

We apply strict security rules regarding the processing of Personal Data and third parties' access to our records and files. We only share your Personal Data when this is necessary to conduct our business or to fulfill an obligation imposed by law.

We may share your information with: (i) all the hotels managed by The company or other hotels, for purposes connected with the provision of our services/products, handling overbookings and the management of our business and for the Hotel to perform the accommodation contract with you and in particular exercise their rights and fulfill their obligations deriving from the accommodation of the Guest and comply with obligations imposed by law or regulations; (ii) our third-party partners, service providers, tour operators, suppliers, bankers and retail partners for the purposes of operating and providing you with the products and services that you have requested; (iii) professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities; (iv) tour operators, insurance companies, insurance brokers, doctors, lawyers for the purposes of handling accidents, illnesses and claims; (v) any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts, tax, regulatory or other public authorities.

When we share Personal Data with other organizations/ third-parties, we safeguard that they keep them safe, that they are authorized to retain these data and that they must not use your Personal Data for other purposes. Such sharing or transfers of Personal Data will be protected by appropriate safeguards (e.g. appropriate contractual clauses, data processing contracts, intra-group disclosures of personal data, etc.) and if the recipient operates outside the EEA, appropriate protections will be put in place to make sure your personal data remains adequately protected including appropriate contract clauses such as standard contract clauses approved by European Commission.

6. Security Safeguards

We recognize the importance of information security, and we are constantly reviewing and enhancing our technical, physical, and logical security rules and procedures.

7. Data retention period

We are committed not to retain Personal Data for a period longer than necessary for the reasons that the Personal Data was obtained and/or to meet legal and regulatory requirements.

8. Your rights under EU data protection laws

You have the right to request from us access to and rectification or erasure of your Personal Data or restriction of processing concerning you or to object to processing as well as the right to data portability; You have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal and the right to lodge a complaint with the competent data protection authority.

9. Contact us

If you would like to update your information, modify your communication preferences and exercise any right by submitting any request or objection or if you do not want to receive marketing communications from The company in the future, you can contact us:

The company / Hotel Owner:

by e-mail: quality@nissiblu.com

by telephone: +35723200500

by writing to us at: NissiBlu Beach Resort, Nissi Avenue 75c P.O.box 30241 5342 Ayia Napa, Cyprus