

## **Privacy Statement**

**ANDREAS AGIOMAMITIS HOTELS LIMITED** (“Pier Beach Hotel Apartments”, “we”, “our”, “us”) recognises and respects your rights and your privacy. That means we’re committed to protecting and safeguarding any personal data you give us. We act in our customers’ interest and we are transparent about the processing of your personal data.

This Privacy Statement is part of and covers the Pier Beach Hotel Apartments website, its operations, reservation process and/or any other agreement between us and you

This document describes what kind of data we collect, how we collect personal data, how we treat personal data of children, why we collect and use personal data, how we share your data with third parties and/or others, how you can access, change or suppress your personal data, how long we retain your personal data, our contact details and other useful information.

This privacy statement applies to any kind of information we collect through all our platforms or other means connected to these platforms (such as contacting us via telephone, email, fax, our website and/or in person).

We might amend the Privacy Policy from time to time. If we make changes to the Privacy Statement which will have an impact on you, we will notify you of these changes beforehand.

If you disagree with this Privacy Policy, you should discontinue using our services.

### **What kind of personal data does Pier Beach Hotel Apartments collect?**

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

In order to help you book your stay with us we will collect Personal Data in accordance with law, such as:

- Name;
- Gender;
- Home/work address;
- Telephone number;
- Email address;
- Date of birth;
- Nationality ;
- Passport and visa or other government-issued identification data;
- Biometric data, consistent with applicable law;
- Data about family members and companions, such as names and ages of children;
- Important dates, including birthdays, anniversaries and special occasions;
- Telephone numbers dialled, faxes sent/received or receipt of telephone messages we provide guests during their visit or stay;

- Credit and debit card number or other payments data;
- Employer or other relevant details if you are an employee of a corporate account
- Additional contact data about you that we sometimes obtain through third parties with whom we do business (e.g., travel agents or similar providers);
- We may also collect information from your computer, phone, tablet or other device you are using to access our services online. This includes the IP address, the geolocation.

If you submit any Personal Data about other people to us (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. It is your responsibility to ensure that the person or people you have provided personal data about are aware that you've done so, and have understood and accepted how we use their information, as described in this Privacy Statement.

### **How does Pier Beach Hotel Apartments treat personal data of children?**

Unless indicated otherwise, Pier Beach Hotel Apartments will only enter into an agreement with you if you are over 18 years of age. We only process information about children with the consent of the parents or legal guardians or when the information is provided to use by the parents or legal guardian.

Pier Beach Hotel Apartments may collect and use information of children only as provided by the parent or guardian or with their consent. If we become aware that we process information of a child under 18 years old without the valid consent of a parent or guardian, we reserve the right to delete it.

### **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 from our Website, communicate with us, or otherwise connect with us or sign up for a newsletter.
- **Property Visits and Offline Interactions.** We collect Personal Data when you visit our properties or use on-property services, such as restaurant/bar, concierge. We also collect Personal Data when you provide your Personal Data to facilitate an event.
- **Customer Service.** We collect Personal Data when you make a reservation over the phone, communicate with us by email, fax or via online booking services or contact customer service.

However, it is not just the data you provide to us, we may also receive information about you from other sources:

- **Third parties:** There are also situations in which we receive information about you from others or automatically collect other information, such as in cases where you make a reservation with third parties, such as [www.booking.com](http://www.booking.com) or when you are employed by a Company who wishes to make the reservation on your behalf. We also integrate third party service providers to facilitate payment between bookers and ourselves. These service providers share payment information so we can administer and handle your reservation.

Pier Beach Hotel Apartments website may include hyperlinks to other independent websites. Pier Beach Hotel Apartments is not responsible for the protecting and safeguarding any personal data on these independent websites.

### **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 might include:

- Browser and device data
- Data collected through cookies and other technologies
- Demographic data and other data provided by you

Pier Beach Hotel Apartments might use cookies when offering its online services. Cookies are small files, which are stored on the hard disk of the computer or mobile device that you are using. Cookies might 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 might 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 might 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.

The information stored in a cookie also depends on your own browser preferences. Should you have switched off the use of cookies or should you wish to do so, then you will still be able to view most parts of the Pier Beach Hotel Apartments website, however, this can be the reason where you will NOT be able to make a request for reservation.

Pier Beach Hotel Apartments is not responsible for erroneous bookings resulting from cookies.

Which cookies can be placed, partly depends on how you land on our website (for instance, directly through the address bar or through a link from a search engine or a third-party website), and which pages you visit on Pier Beach Hotel Apartments (for instance, a search results page or the request for reservation)

### **Why do we collect and use your personal data?**

The main reason we ask you for personal details is to help administer your reservation with us, ensure you get the best stay with us possible. We also use your personal data to contact you and to inform you of the latest deals and special offers and other products or services which we believe may be of interest to you. We further use your personal data to protect Pier Beach Hotel Apartments and our guests as specified further 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 rely on certain legal grounds when we process your Personal data. The way we use Personal Data in the ways described below to comply with our Contractual obligations, legal obligations and legitimate business interests as specified below:

**A) 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
- 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

We rely on the legal grounds of Contract and Legitimate Interest.

**B) Communicating with you:** There may be other times when we get in touch, including by email, by post, by phone or by texting you – which method we choose depends on the contact information you've previously shared with us. And we process the communications you send to us. There could be a number of reasons for this, including:

- Confirmations or pre-arrival messages
- Responding to and handling any requests you or a third party you have used to complete the booking may have made.
- If you have not finalized a reservation, we can contact you with a reminder to continue with your reservation.
- When you use our services, we might send you a questionnaire or invite you to provide a review about your experience with us.

We rely on the legal ground of Legitimate Interest.

**C) Promotion of a safe and trustworthy service:** In order to create a trustworthy environment for you, we may use personal data for the detection and prevention of fraud and other illegal or unwanted activities. Similarly, we may use personal data for risk assessment and security purposes, including the authentication of reservations. For such purposes, we may have to stop certain reservations or put on hold reservations until we have finished our assessment.

We rely on the legal ground of Legal Obligation and Legitimate Interest.

**D) 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 rely on the legal ground of Legal Obligation and Legitimate Interest.

**E) Legal purposes:** In certain cases, we may need to use your information to handle and resolve legal disputes, for regulatory investigations and compliance, to enforce our legal rights in case of an action, claim or dispute or to comply with lawful requests from law enforcement.

We rely on the legal ground of Legal Obligation and Legitimate Interest.

Providing your personal data to us is voluntary. However, depending on the type of service you may want to use, we may only be able to provide you with this service if certain personal data is collected. For instance, we cannot process your reservation if we do not collect your name and contact details.

If we intend to use your Personal Data for a purpose that is materially different from these purposes or if we intend to disclose it to a third party not previously identified, we will notify you and obtain your consent prior to the process.

### **How does Pier Beach Hotel Apartments share your data with third parties?**

Third parties may receive some of your data such as financial institutions, or in some cases governmental or other authorities. We do not sell or rent your personal data. In some case your data may be shared with Migration if so required by law and CTO (Cyprus Tourism Organisation), however this will be done for statistical purposes and therefore, the data shared will be anonymous. Some of the third parties we may share your personal data with are categorised below:

**Service Providers.** We may 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 fulfilment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing and other services.

**Corporate Reorganisation.** 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 Pier Beach Hotel apartment business, assets or stock (including any bankruptcy or similar proceedings).

**Your Employer.** We may disclose or transfer your Personal Data and Other data to your employer if you are an employee of a corporate account and/or if your reservation was booked by your employer on your behalf.

**Competent authorities:** We may disclose personal data to law enforcement insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud or if we are otherwise legally obliged to do so. We may need to further disclose personal data to competent authorities to protect and defend our rights or properties.

### **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 legal rights; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of the Pier Beach Hotel apartments, 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.

### **How you can access, change or suppress your personal data**

You always have the right to review the personal data we keep about you. You can request an overview of your personal data by using our contact information stated below. If you want to find out more about your rights to control your personal data, read the following.

- you can ask us for a copy of the personal data we hold about you;
- you can inform us of any changes to your personal data, or you can ask us to correct any of the personal data we hold about you
- in certain situations, you can ask us to erase, or block or restrict the processing of, the personal data we hold about you, or object to particular ways in which we are using your personal data; and

- in certain situations, you can also ask us to send the personal data you have given us to a third party.

Where we are using your personal data on the basis of your consent, you are entitled to withdraw that consent at any time subject to applicable law. Moreover, where we process your personal data based on legitimate interest or the public interest, you have the right to object at any time to that use of your personal data subject to applicable law.

We rely on you to ensure that your personal data is complete, accurate and current. Please do inform us promptly of any changes to or inaccuracies of to your personal data by contacting us.

You can send us your request at no cost to exercise your rights referred to above. For any of your requests in regards to this Privacy Statement and to exercise any of your rights you may contact us directly or you may also contact your local data protection authority.

If you wish to object to the processing of your personal data on the basis of legitimate interest you may also contact us.

In your request, please make clear what Personal Data you would like to have changed, whether you would like to have your Personal Data suppressed from our database, or other limitations you would like to put on our use of your Personal Data. For your protection, we only fulfil requests for the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before fulfilling your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we often need to retain certain data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a reservation, you may not be able to change or delete the Personal Data provided until after the completion of such reservation). There may also be residual data that will remain within our databases and other records, which will not be removed. In addition, there may be certain data that we may not allow you to review for legal, security or other reasons.

## **Retention**

We limit the collection and use of Personal Data to the information that is relevant for the purposes of processing and will not process Personal Data in a way that is incompatible with the purposes for which the information has been collected or subsequently authorised by you. We take reasonable steps to ensure the Personal Data

is reliable for its intended use, accurate, complete, and current to the extent necessary for the purposes for which we use the Personal Data.

We will retain your Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

All personal data we retain will be subject to this Privacy Statement.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you keep using our services)
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations)

### **Who is responsible for the processing of personal data at Pier Beach Hotel Apartments and how to contact us?**

**ANDREAS AGIOMAMITIS HOTELS LIMITED** controls the processing of personal data as described in this Privacy Statement. **ANDREAS AGIOMAMITIS HOTELS LIMITED** is a company incorporated and registered under the laws of the Republic of Cyprus with incorporation number HE 19745 and registered office situated at Leonardo Da Vinci, 8, Limassol, Cyprus.

If you have any questions about this Privacy Statement, or would like to make a request as per this Privacy Statement please contact us at [hotel@pier-beach.com](mailto:hotel@pier-beach.com), or by mail:

261A, 28th October Avenue, 3035 Ayia Trias, Limassol, Cyprus or P.O.Box 51656, 3507 Limassol, Cyprus

You also can:

- Contact our General Manager at [hotel@pier-beach.com](mailto:hotel@pier-beach.com),
- Lodge a complaint with a data protection authority at <http://www.dataprotection.gov.cy>

### **Data security**

We use reasonable physical, electronic, and administrative safeguards to protect your Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into consideration the nature of the Personal Data and the risks involved in processing that information