

PRIVACY POLICY

THEOXENIA HOTELS (referred to herein as "**THX**," "**we**," and "**us**") is committed to protecting your privacy and wants you to be familiar with how we collect, use, and disclose Personal Information (as defined below). References to "**THX**," "**we**" and "**us**" throughout this Policy, depending upon the context, collectively refer to **THX**.

By using this website or by any other means providing Personal Information (as defined below) to THX, or otherwise indicating your consent to receipt information from us, you effectively consent to all actions taken by us with respect to your Personal Information as set forth in this Policy. If you do not agree to the terms and conditions of this Policy, please do not use our Site or provide any Personal Information to THX through our Site or by any others means. This Policy does not describe the collection, use, or disclosure of information by third parties.

PERSONAL INFORMATION WE COLLECT

THX may collect "**Personal Information**" from you, meaning information that identifies you as an individual or from which you may be identified or it is related to you. For example, we may collect:

- contact information, such as your name, mailing address, e-mail address, and telephone number;
- credit card number or other payment account number, billing address, and other payment and billing information ("Payment Information");
- records and copies of your correspondence if you contact us;
- information necessary to fulfil special requests (e.g., health conditions that require specific treatment);
- guest stay information, including date of arrival and departure, and goods and services purchased (e.g. SPA, GYM, laundry);
- information collected through the use of closed circuit television systems and other security systems; and

We may collect Personal Information from a variety of sources including:

- through the Site (e.g. booking module, contact requests);
- through web or other agents;
- through reservation at the hotel;
- through social media (e.g. Facebook);
- when you otherwise voluntarily provide it to us in order to provide you with services during your stay.

If you voluntarily share "Sensitive Information" (e.g., Personal Information related to your health) with us, that information will only be used as necessary to fulfill special requests (e.g. health conditions that require specific accommodations). For example, if you voluntarily convey a health-related need to us, we may store and use that information in order to provide a room with appropriate amenities. By providing such Sensitive Information, you expressly consent to our collection, processing and storage of that information in accordance with the terms of this Policy.

On the other hand, we do not collect or store Sensitive Information in order to provide specific services during your stay (e.g. SPA) unless we get your explicit consent.

Please be aware that you may withdraw consent at any point in time by contacting us by person, phone or e-mail.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

THX may collect, use, and disclose Personal Information for one or more of the following purposes:

- Fulfillment of Reservation or other Requests. To fulfill your requests such as completing a credit card transaction or booking a reservation or respond to messages from within our web site through our contact form. In particular, when you make a reservation through THX's reservation system, we may collect Payment Information from you, and may use and disclose such Payment Information to fulfill your reservation. THX maintains a website, and database computers in Greece which are intended to help THX conduct business and to facilitate the operation and maintenance of its reservation system.
- Internal Business Purposes. For our internal business purposes, such as data analysis, audits, developing new products, enhancing the Site, improving our services, identifying usage trends and visiting patterns, meeting contractual obligations.
- Our Legal Duties. To comply with legal and regulatory requirements or demands in accordance with EU Privacy Law, a court order, subpoena, or other legal process.
- Additional Uses. We may also use your Personal Information in other ways as described when you provide such information to us or for other purposes with your consent.

HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION

- Third-Party Service Providers. THX relies on numerous third-party service providers to provide certain products and services on our behalf, including reservation services, credit card/payment processing and billing, IT services, e-mail delivery services, and other similar services. We may share your Personal Information for the purpose of enabling these third parties to provide such services or as otherwise necessary for the ongoing operation of THX's business. When we do outsource the processing of your Personal Information to third parties or provide your Personal Information to third party service providers, we require those third parties to protect your Personal Information with reasonable security measures and to limit their use only to the purposes for which we have disclosed it to them.
- Assignment. In the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of THX's assets, or stock (including in connection with any bankruptcy or similar proceedings), we may transfer any and all information that we collect pursuant to this Policy. Any successor, assignee, or transferee may use your Personal Information as described in this Policy.
- Social Networking. THX may make available interactive services (e.g. Facebook) through which you may post information for reservations. Please note that any information you disclose through such services becomes public information and may be available to visitors to the Site and to the general public. We urge you to exercise discretion and caution when deciding to disclose your Personal Information, or any other information, through these services. If you choose to voluntarily disclose your personal Information through such a forum it may be available to the public and might be used by others for any purpose.
- Law Enforcement; Emergencies; Compliance. We may disclose your Personal Information: (i) when we have reason to believe that it is necessary to identify, contact, or bring legal action against persons or entities that may be causing injury to

you, THX, or others; (ii) when we believe that EU Privacy Law requires it; (iii) as mandated by subpoena, court order, or legal process; (iv) to establish or exercise our legal rights, defend against legal claims, or protect our operations; (v) to protect the rights, privacy, safety, or property of THX, you, or others; (vi) to investigate, prevent, or take action regarding suspected illegal activities, (vii) to investigate, prevent, or take action regarding suspected fraud, (viii) to investigate, prevent, or take action regarding situations involving potential threats to the physical safety of any person, (ix) to investigate, prevent, or take action regarding violations of agreements or policies, or (x) as otherwise required or permitted by law.

COOKIES

We may also collect information related to cookies. A cookie is a simple text file that is stored on your computer or mobile device by a website's server. Cookies allow a website to remember your preferences, and items you have placed in your shopping cart. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. The "Help" function within your browser should tell you how to do this. Alternatively, you can visit www.allaboutcookies.org, which gives comprehensive information on how to disable cookies on a wide variety of desktop browsers. If you disable or refuse cookies, please note that some parts of this Site may then be inaccessible or not function properly.

IP ADDRESSES

Your IP address is a number that your Internet Service Provider automatically assigns to the computer that you are using to access the Site. This number is identified and logged automatically in our server log files whenever users visit the Site, along with the time of each visit and the page(s) that were visited. Collecting IP addresses is standard practice on the Internet and is done automatically by many websites. We use IP addresses for purposes such as calculating Site usage levels, helping diagnose server problems, validation of a legitimate user session via Google[®] captcha and administering the Site. Please note that we treat IP addresses, server log files, and related information as Non-Personal Information, except when we are required to do otherwise under EU Privacy Law. IP addresses are retained for 1 year.

DO NOT TRACK

Your web browser may let you choose your preference as to whether you want to allow websites to collect information over time about your online activities across different websites or online services. At this time, the Site does not respond to such "Do Not Track" or similar preferences you may have configured in your web browser, and the Site may continue to collect information in the manner described in this Policy. However, as stated in the "Non-Personal Information" section above, we do allow you to exercise some choice in the information collected by adjusting your browser's cookie settings.

THROUGH BROWSER OR DEVICE

Certain information is collected by most browsers 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 information to ensure that the Online Services function properly.

THIRD-PARTY SITES

The Site may contain links to third-party websites. These linked sites are not under THX's control, and we are not responsible for the privacy practices or the contents of any such linked site (or any link contained in any linked site). We provide such links only as a convenience, and the inclusion of a link on the Site does not imply endorsement of the linked site by THX. If you decide to access any of the third-party websites linked to this Site, you do so entirely at your own risk and subject to the terms and conditions of use and privacy policies for such websites. If you provide any Personal Information through any such third-party website, your Personal Information will be treated in accordance with the privacy policy of that third party.

SECURITY

Because the security of your Personal Information is important to us, we have implemented security measures that provide reasonable precautions against the unauthorized access, disclosure, alteration, or destruction of Personal Information. The Personal Information we collect from you online is stored by us and/or our service providers and protected through a combination of physical and electronic access controls, firewall technology, and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, access, misuse, or alteration of Personal Information. Where required by law, we will notify you of any such loss, access, misuse, or alteration of Personal Information that may affect you, so that you can take the appropriate actions to protect your rights. We may decide to notify you by mail, email, or telephone where permitted by law.

Please do not send us your Payment Information or Sensitive Information through e-mail or any undesignated area (e.g., submission of your credit card number in a "comment" field). If you have reason to believe that your interaction with us is no longer secure (e.g., if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the alleged problem by contacting our Customer Care Department as set forth below in this Policy. Please note that, if you choose to notify us via physical mail, this will delay the time it takes for us to respond to the alleged problem.

YOUR CHOICES

You may always choose what Personal Information (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected. For example, we cannot take a reservation without a name, and we may be unable to provide you with all or certain reservation services, or other services. We will endeavor to comply with your requests as soon as reasonably practicable.

EU Data Privacy Law may require us to obtain your consent before we send you information that you have not specifically requested. In certain circumstances, your consent may be implied (e.g., where communications are required in order to fulfil your requests and/or where you have volunteered information for use by us). In other cases, we may be required to seek your consent expressly (e.g., where the information collected is regarded to be Sensitive Information under EU Data Privacy Law).

YOUR RIGHTS

Pursuant to EU Data Privacy Law, you have the right to:

- (a) Know what personal data concern and are processed by THX, as well as their origin (right of access);
- (b) Ask for their correction and / or completion so as to be complete and accurate, presenting each necessary document from which the completion or correction need arises (right to correction) which at the same time is an obligation of yours;

- (c) To request the restriction of processing (restriction right).
- (d) Refuse / object to the processing of your personal data which maintains THX (right to object).
- (e) Request the deletion of your by the records of THX (right to forget).
- (f) Ask THX to transfer the data which you have given, to any other person responsible for processing (right to data portability).

Any information, communication or actions necessary for satisfying the above rights shall be provided free of charge. Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or refuse to act on the request.

THX will do everything in its power to respond within thirty (30) days, which may be delayed for another thirty (30) days in case THX decides so based on the complexity of the request or other reasons. THX will inform its clients in case of such a delay accordingly.

DATA RETENTION AND MINIMIZATION

THX only collects Personal Information that it believes is necessary to perform the services that you seek from THX and to exercise its rights and comply with its obligations as otherwise outlined in this Policy. We will keep your Personal Information only as long as we need it for the purposes for which we collect it or as otherwise required by law.

NOTE REGARDING THE USE OF THE SITE BY MINORS

The Site is not directed to minors (as defined by EU Privacy Law), and we request that such individuals do not provide Personal Information through the Site. If we learn we have collected or received Personal Information from a minor under the age of 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a minor under the age of 13, please contact us as set forth in the "Contacting Us" section of this Policy.

CONTACTING US

If you have any questions regarding this Policy, any requests concerning your rights or would like to update your information or modify your communication preferences, please contact us:

2 Filadelfeos Street, Kifissia
Athens 14562 – Greece
Tel. (+30)-210-6233622
Fax (+30)-210-6231675
info@theoxeniapalace.com

Please note that e-mail communications will not necessarily be secure; accordingly, you should not include Payment Information or Sensitive Information in your e-mail correspondence to us.



CHANGES TO THE POLICY

THX reserves the right to change, modify, or amend this Policy at any time. The date this Policy was last revised is at the top of this page. If we make a material change to this Policy, we will indicate on the Site that our privacy practices have changed and will provide a link to the new policy. If we make material changes to how we use your Personal Information, we will notify you by e-mail to the e-mail address specified in your account (if applicable) and/or through a notice on the Site's home page, and we will provide you with an opportunity to opt-out of such new or different use. Any changes to the Policy will become effective upon our posting of the revised Policy on the Site. Use of the Site following such changes constitutes your acceptance of the revised Policy then in effect.