



PRIVACY POLICY

Introduction

At IDEON HOTEL (hereinafter referred to as the “Hotel” or the “Company”, “we”, “us”, “our”), we are committed to protecting and respecting your privacy, as well as ensuring the proper and lawful processing of the personal data you entrust to us. Your privacy is a key priority for us and an integral part of the quality of the services we provide.

This Personal Data Protection Policy (“Policy”) describes the way we collect, use, store, transfer and protect Personal Data of customers, visitors, partners, suppliers, employees, job applicants and other individuals who transact with the Hotel. At the same time, it clearly informs you about the purposes and legal bases of processing, the retention period of the data, their possible recipients, as well as the rights granted to you by the applicable legislation.

This Policy has been drafted in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”), Greek Law 4624/2019 and any other applicable Greek or European Union legislation, while the Hotel implements the appropriate technical and organizational measures for the security and protection of personal data. Please take a moment to read this Policy carefully.

Information and PERSONAL DATA that we collect on you

The Hotel may collect and process personal data relating to staying guests and prospective guests, non-resident guests using services or facilities (such as the restaurant and bar), participants in conferences and events, suppliers, partners, employees, prospective employees, as well as visitors to its website, within the framework of its activities and for lawful, specified and explicit purposes.

Such data are collected either directly from you or through lawful and fair procedures and are used, as applicable, for the provision of services, communication, customer service, invoicing, compliance with legal obligations, management of partnerships, staffing, operation of the website and improvement of the services provided.

We also inform you that:

- ✓ • The Hotel operates a video surveillance system (CCTV) in areas designated by the relevant Greek legislation and the Hellenic Data Protection Authority. These areas bear appropriate signage and reference via QR code to the relevant personal data processing policy of the system. The video surveillance system operates for the purpose of protecting the health and safety of our employees and customers, as well as for the protection of property.

Categories of Data Subjects

Customers – Prospective Customers – Website Visitors

We may process data, including the following, during the provision of accommodation services and the use of our facilities by you, which may contain personal data or be considered personal data:

- ✓ Full name, home address and/or business address, email address, telephone numbers (landline or mobile), identity card or passport number, nationality, date of birth. Please note that all of the above data are required by Greek legislation for the provision of accommodation services in tourist establishments.
- ✓ Arrival / departure dates, number of persons per room, room type, special accommodation requests, booking history.
- ✓ Payment / invoicing / transaction details, limited credit or debit card details through secure payment providers or other transaction data.
- ✓ Information regarding your profession, or your participation in professional or other organizations, only where such information has been declared by you.
- ✓ Medical data (for the provision of accommodation services or for dealing with emergency health incidents), dietary habits / preferences and possible allergies.
- ✓ Finally, any other data you request us to process on your behalf or which are necessary in order for us to provide you with the best possible accommodation, gym and wellness services, entertainment, conference and reception services.

- ✓ Specifically when accessing our website:
- ✓ When you visit our website, information may be automatically collected such as IP address, device type, browser type, date and time of access, as well as the pages you visited.
- ✓ Such data are used for security purposes, technical operation, statistical analysis, improvement of user experience and development of our services.
- ✓ We may use cookies or similar technologies in accordance with the Company's Cookies Policy. Where required, your prior consent is requested through the relevant selection mechanism (cookie banner).

Non-Resident Customers – Use of Facilities and Services

In the event that non-resident customers use our facilities and services (restaurant and bar) within the premises, we will need to collect the following data:

- ✓ Full name, email address, telephone numbers (landline or mobile).
- ✓ Date and booking of the service or facility, special service requests and booking history.
- ✓ Payment / invoicing / transaction details, limited credit or debit card details through secure payment providers or other transaction data.
- ✓ Medical data (for the provision of services of the establishment or for dealing with emergency health incidents), dietary habits / preferences and possible allergies.
- ✓ Finally, any other data you request us to process on your behalf or which are necessary in order for us to provide you with the best possible accommodation, gym and wellness services, entertainment, conference and reception services.

Participants in Conferences and Events

For participants in conferences and events we collect personal data as in the cases of customers, prospective or not, resident or non-resident, except where the event is organized by a third party, who then bears full responsibility for the processing of the participants' personal data for the specific event.

Employees – Job Applicants

In the case of employees of the Hotel, we process the data required by the relevant Greek tax and labor legislation and by the legitimate interest of the Hotel:

- ✓ Full name, home address and/or business address, email address, telephone numbers (landline or mobile), identity card or passport number, nationality, date of birth, marital status, social security number (AMKA), IBAN, Tax Identification Number (TIN / AFM), job specialty, degrees, certifications.
- ✓ In general, any information stated in the employee's curriculum vitae.
- ✓ Leave records (annual leave, emergency leave, parental leave, sick leave, etc.), days off and employee shift schedules.
- ✓ Payroll / benefits data, rewards and staff performance evaluation data.

For job applicants, the Hotel has a specific CV Evaluation Policy, which is made available to job applicants.

Partners – Suppliers

For the Hotel's partners and suppliers, the data required by the relevant Greek tax legislation are collected:

- ✓ Full name, business address, email address, telephone numbers (landline or mobile), Tax Identification Number (AFM), specialty, degrees, certifications, business activity codes (KAD), and generally any data stated on the supplier's / partner's tax documents or retrieved through tax / accounting systems.
- ✓ Payment details and IBAN account details.
- ✓ Supplier / partner evaluation data.

Purposes of Processing

We process personal data for:

- ✓ management of bookings and provision of accommodation
- ✓ identification of customers in accordance with the law
- ✓ invoicing and payments
- ✓ provision of restaurant, SPA, wellness, gym and swimming pool services
- ✓ organization of conferences, events and receptions
- ✓ customer service and handling of requests
- ✓ communication before, during and after the stay
- ✓ sending offers or uPersonal Dataates where permitted
- ✓ improvement of services and customer experience
- ✓ security of persons, facilities and systems
- ✓ prevention of fraud or malicious actions
- ✓ compliance with legal, tax and labor obligations

Legal Bases for Processing

The legal bases for processing are, as applicable:

- ✓ performance of a contract or taking steps prior to entering into a contract
- ✓ compliance with a legal obligation
- ✓ the legitimate interest of the Hotel
- ✓ your consent where required
- ✓ protection of a vital interest in emergency cases

For special categories of data, the specific exemptions of the GDPR apply.

Security of Personal Data

We are committed to making every feasible effort to protect your Personal Data. For this reason, we use a variety of technologies, security procedures, technical and organizational measures for the protection of Personal Data against unauthorized access and use, loss, destruction, malicious alteration and, in general, any unlawful processing. Please note that no physical or electronic security system is absolutely secure. However, we are committed to continuing to review and improve our security policies and to implement additional technical and organizational security measures as new technologies become available.

Where external service providers are engaged (such as website hosting, email services or cloud infrastructure), the Hotel carefully selects providers that offer adequate security guarantees and process personal data only on its instructions and in accordance with applicable contractual and legal obligations.

The Hotel ensures that its website, booking system and email services are hosted by providers located within the European Union.

Retention of Personal Data

We retain Personal Data only for as long as is necessary for the fulfillment of the purposes for which they were collected or for as long as required by applicable legislation.

In particular:

- ✓ Data relating to contracts, orders, invoicing and transactions are retained for as long as required for the performance of our contractual relationship and, after its termination, for the period imposed by tax, commercial, accounting or other applicable legislation.
- ✓ Employee data are retained for as long as the employment relationship lasts and thereafter for as long as required by labor, social security, tax and other relevant legislation.
- ✓ Supplier and partner data are retained for as long as the cooperation lasts and for as long as required for compliance with legal obligations or for the defense of the Company's rights.
- ✓ Job applicant data are retained for a reasonable period following completion of the recruitment process, unless longer retention is required or consent has been provided for future job opportunities.
- ✓ User account data are retained for as long as the account remains active. In the event of a deletion request, the data are deleted or anonymized, unless their retention is required for compliance with legal obligations or for the establishment, exercise or defense of legal claims.
- ✓ Technical website usage data, log files and cookie data are retained in accordance with the Cookies Policy and for the strictly necessary period of time.

In the event of judicial proceedings, an inspection by a competent authority or the raising of legal claims, the Company may retain the relevant data until the final resolution of the matter.

Transfer of Personal Data

We ensure that Personal Data are subject to lawful, fair and secure processing and are not transferred to third parties without a lawful basis for processing.

Access to the data may be granted, as applicable, to authorized employees of the Hotel, as well as partners or third-party service providers acting on our behalf and only to the extent necessary for the fulfillment of the purposes of processing.

Recipients of the data may include:

- ✓ accountants, tax consultants and financial advisors
- ✓ legal advisors
- ✓ providers of IT services, technical support, website hosting and cloud services
- ✓ providers of email and communication services
- ✓ banks and payment providers
- ✓ transport or courier companies, where required
- ✓ public authorities, supervisory bodies or judicial authorities, where required by law

All partners and third-party providers processing data on our behalf are contractually bound to maintain confidentiality, apply appropriate security measures and process the data only in accordance with our instructions and the applicable legislation.

The Hotel does not disclose, sell or lease personal data to third parties for their own commercial purposes.

Electronic Mail (e-mail)

If you do not wish to receive marketing and promotional electronic mail messages from the Hotel, you may click on the unsubscribe link in the email message to cancel your subscription and withdraw from email and marketing communications.

You may also state in the relevant registration form of the Hotel that you do not provide your consent to receive promotional electronic mail messages, in which case you may choose not to participate in the Hotel's mailing lists.

Please note that even if you opt out of receiving marketing messages from us, we may still need to send you service-related communications, such as confirmation of any future bookings you may make.

Supplementary Policies

This Policy is supplemented by more specific policies regarding Cookies, CCTV, WiFi and Data Retention Periods, available on our website or upon request.

Your Rights and How You May Exercise Them

You have the right:

- ✓ To know which of your personal data we keep and process, their origin, the purposes of their processing, as well as their retention period (right of access).
- ✓ To request the correction and/or completion of your personal data so that they are complete and accurate (right to rectification). You may be required to provide any necessary document from which the need for correction or completion arises.
- ✓ To request the restriction of the processing of your data (right to restriction of processing).
- ✓ To refuse and/or object to any further processing of your personal data held by us (right to object).
- ✓ To request that we transfer the personal data we hold to any other controller of your choice (right to data portability).
- ✓ To submit a complaint to the Hellenic Data Protection Authority (www.dpa.gr), if you believe that your rights are infringed in any way (right to lodge a complaint with the Authority).
- ✓ To request the deletion of your personal data from the records we keep (right to erasure / right to be forgotten).

In relation to the exercise of the above rights, the following are noted:

- ✓ The Company reserves the right to refuse requests for restriction, deletion or objection where processing or retention is necessary for the establishment, exercise or defense of its lawful rights or for the fulfillment of its obligations.
- ✓ The exercise of the right to data portability does not imply the deletion of your data from our records, which remains subject to the terms of the immediately preceding paragraph and the conditions of the Regulation.
- ✓ The exercise of the above rights applies to the future and does not concern processing already carried out.

Data Controller

For the exercise of your above rights in accordance with European and Greek legislation and the restrictions defined in them, you can contact in writing at the address of the Company: HOTEL IDEON Sq. Nikolaou Plastira 10, 74100 Rethymno Crete Greece, e-mail: info@hotelideon.gr, dpo@hotelideon.gr

Data Protection Officer

The Data Protection Officer is Mr. Bouros Sotirios, who may be contacted at: dpo@hotelideon.gr, info@nousgdpr.gr

Changes to this Policy

We reserve the right to amend this Policy in accordance with uPersonal Dataates to European and Greek legislation or where necessary. If we make any changes, we will post the changes here so that you may have immediate access to them. *(Last uPersonal Dataate of this Policy: 27 April 2026).*