

1. Introduction

Parklane Hotels Ltd (referred as Parklane or "we") operates Parklane Resort & Spa Limassol, a collection of 222 rooms, 34 suites, 18 villas, Kalloni Spa, and a collection of six restaurants and bars, highlighted by NAMMOS and LPM. Parklane values its clients (referred as "you") and recognizes that privacy is important to you. We want you to be familiar with how we collect, use, and disclose your personal and other data (collectively, "Data" or "personal data").

We wish to hereby inform you that we comply with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 "Protection of natural persons with regard to the processing of personal data and on the free movement of such data (referred as the "Regulation").

This privacy policy was prepared on the following legislation and guidelines:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 "Protection of natural persons with regard to the processing of personal data and on the free movement of such data".
- Law 125(I)/2018) providing for the protection of natural persons with regard to the processing of personal data and for the free movement of such data.
- General guidance to promote a common understanding of European data protection laws published by the European Data Protection Board (EDPB)
- Guidelines, decisions and opinions of the Office of The Commissioner for personal data Protection.

2. Who we are?

This Privacy Statement applies to the processing of personal data (also referred as data) by Parklane Hotels Ltd who is the primary data controller. Parklane Hotels Ltd is a private limited liability company registered under the laws of the Republic of Cyprus with registration number HE 16364 and contact data:

Premises address:	11 Giannou Kranidioti Street, Pyrgos, 4534 Limassol, Cyprus
Postal address:	P O Box 56560, 3308 Limassol, Cyprus
Telephone:	357 25862000
E-mail	info@parklanecyprus.com

3. Useful 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;

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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

Recipient means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

Third party means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data

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

Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed

4. Principles relating to processing of personal data

Parklane is committed to the following principles of personal data processing, according to clause 5 of the Regulation:

1. Data is processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').

2. Data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes,
3. Data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Data is accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
5. Data is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject.
6. Data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

5. The data we collect

We collect personal data in accordance with (EU) 2016/679 and to provide you with exemplary services. In this section you can get informed on the categories of personal data we collect and process.

5.1. When using Parklane

5.1.1 Accommodation reservations, use of guest rooms and guest services:

- Basic data (Full name, postal address, telephone number, email address)
- Gender
- Date and place of birth
- Identification card, passport, or other government-issued identification data
- Employer details (for business-related bookings)
- Dates of accommodation or service
- Financial information (such as credit and debit card numbers or other payment data)
- Data about companions (e.g. family members, friends), names, and ages of children.
- Data relating to accommodation and other preferences (e.g. type of room, dietary, type of pillows)
- Health data (e.g., allergies and disabilities)

- Travel itinerary, tour group, or activity data
- Prior guest stays or interactions, goods and services purchased, special service and amenity requests
- We may also collect information about your "Stay Preferences" that we use to make your current and future stays and experience with us more enjoyable, including information about your interests and other relevant information that we learn about you during your stay. This may also include any likes and dislikes about our services that you tell us about so that we can improve our services, and specific dietary, health restrictions or personal needs to ensure your wellbeing.
- We may also collect your "Personal Preferences," that may include details of your special anniversaries (such as your birthday or wedding anniversary), what type of activities you prefer to take part in when staying with us, and your hobbies. Personal Preferences may also include details about who you usually travel with, their relationship to you, and your marital status.

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.

5.1.2 Use of Loyalty Programs:

- Basic data (Full name, postal address, telephone number, email address)
- Unique identification data (i.e. membership number)
- Membership or loyalty program data

5.1.3 Use of food and beverage services and outlets:

- Basic data (Full name, guest room number, postal address, telephone number, email address)
- Unique identification data (i.e. membership number)
- Dates and times of reservations and use of outlets,
- Number of people for reservations
- Financial information (such as credit and debit card number or other payment data)
- Preferences (e.g. table, smoking area, eating preferences, dietary)
- Health data (e.g., allergies)
- Prior services or interactions, goods and services purchased, special service and requests

5.1.4 Events:

- Basic data (Full name, guest room number, postal address, telephone number, email address)
- Dates and times of events
- Names of people attending or participating
- Financial information (such as credit and debit card number or other payment data)

- Preferences (e.g. eating preferences, dietary)
- Health data (e.g., allergies)
- Prior services or interactions, goods and services purchased, special service and requests

5.1.5 Reservations and use of lifestyle services (Kalloni spa, Parkfit e.t.c.):

- Basic data (Full name, guest room number, postal address, telephone number, email address)
- Gender
- Date of birth
- Unique identification data (i.e. membership number)
- Dates and times of provided services
- Financial information (such as credit and debit card numbers or other payment data)
- Health data (e.g., allergies, pregnancy, skin type, health issues, smoking, stress condition)
- Prior guest services or interactions, goods and services purchased, special service and amenity requests

5.1.6 Use of Kids club – Park Explorers:

- Basic data (Full name, postal address, telephone number, email address)
- Gender
- Birthdate
- Unique Identification Data (membership number)
- Financial Data (e.g. payments)
- Data relating to preferences (e.g. drinks, meals, etc.)
- Health data (e.g. allergies, health issues)

5.1.7 Sales and marketing:

- Basic data (Full name, guest room number, postal address, telephone number, email address)
- Important dates (e.g., birthdays, anniversaries, and special occasions)
- Social media account ID, profile photo, and other data publicly available, or data made available by linking your social media and loyalty accounts

5.1.8 Video surveillance system (CCTV system) and management of accidents:

- Images, and video data via security cameras located in public areas, such as hallways and lobbies, in our properties.
- Health data related to accidents that resulted in injuries.

5.2. When using online services

Typically, we do not collect personal data through your use of the Online Services. However, we may collect “Other Data” that does not directly identify you. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as personal data. “Other Data” includes:

- **System Data:** When you use both desktop and mobile devices to access the Online Services, we collect certain data through your browser or automatically through your device, such as your computer type, 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 you are using.
- **IP Address:** We also collect your IP address, a number that is automatically assigned to the device 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.
- **Precise Location-Based Services:** With your consent, 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 improve special offers and to enable location-driven capabilities on your device. If you have opted-in to share your location, the App or other program will continue to collect location data based on how you chose to share the data.
- **Precise Location Opt-Out:** You can specify via your device's operating system (such as through the “Settings” icon) to always share location data, only when the App is in use, or never. If you choose only when the App is in use, we will have access to the data until you log off or close the application or until you use your phone's or other device's settings to disable location capabilities for the Bonvoy™ App or other program.

5.3. When using our website

When you visit our website from either a desktop or mobile device, we may collect and use cookies or other identifiers to serve you with personal advertisements, either via email, on our website, or on other websites on the Internet; to measure how you interact with our Website; and to maintain your preferences. We do this primarily through cookies, which are pieces of data stored directly on the computer or mobile device that you are using.

You can learn more about cookies at: <http://www.allaboutcookies.org/manage-cookies/index.html>.

In general, we use four different types of cookies:

- **Required Cookies:** These cookies are necessary to enable the basic features of the Website or app, such as providing a secure log-in.
- **Functional Cookies:** These cookies allow our Websites to remember your site preferences and choices you make on the site. We also use functional cookies to facilitate navigation, to display content more effectively, and to personalize your experience.

- **Advertising Cookies:** Advertising cookies allow us to select which advertisements or offers are most likely to appeal to you. We also use them to track responses to online advertisements and marketing and to better understand your interests or to share this information with advertisers. These cookies may also allow you to share certain pages with social networks.
- **Analytics Cookies:** Analytics cookies help us improve our website by collecting and reporting information on how you use it.

There are several ways to opt-out of cookies. If, however, you do not accept any 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.

1. **Browser settings:** You can opt out of cookies on your browser. Every browser is different so please check the instructions provided by your browser.
2. Through our "**Tracking Preferences**" site.
3. **Google Analytics:** We collect data through Google Analytics and Adobe Analytics, which use cookies and technologies to collect and analyze data about use of the Online Services. These services also 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/ and opt out by downloading the Google Analytics opt out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>
4. You can learn more about Adobe and opt out by visiting <http://www.adobe.com/privacy/opt-out.html>.

We may use third-party advertising companies to serve advertisements on our Websites, Apps, and other websites regarding both Parklane and third-party goods and services that may interest you when you access and use the Online Services or 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.aboutads.info/>

<http://www.youronlinechoices.eu>

<https://legal.yahoo.com/xw/en/yahoo/privacy/optout/index.html>.

For the advertisements you see on Marriott Online Services, you can also opt-out

- directly in the ad by clicking on the AdChoices icon;
- by opting out of Advertising Cookies in **Tracking Preferences**; or
- by visiting <https://legal.yahoo.com/xw/en/yahoo/privacy/optout/index.html>.

5.4. Apps and Mobile Devices

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 id. We use this data to ensure that the Online Services function properly.

Our Apps may also contain software development kits (SDKs) from third parties which may collect and transmit data to enable various features in the App.

With your consent if required by the operating system, we may also collect mobile device advertising identifiers to enhance and personalize your experience and deliver relevant products, content, or ads to show you on our Websites, Apps, or external advertising.

Our Apps may contain optional features made available to developers by the device's operating system. To improve your experience, we may require your permission for the use of your device's location, camera, or other functions (e.g., using your device's camera to capture your credit card information). You may choose not to allow the use of such functions, in which case the App features relying on such functions may not be available to you. Go to your device's settings to manage these permissions.

5.5. Aggregated and segmented data.

We may aggregate data that we collect, and this aggregated data will not personally identify you or any other user. We may also use both personal data and Other Data to divide customers into segments, or groups, to provide more relevant advertising.

5.6. Sensitive data

From the analysis of this section is evident that we process the following sensitive personal data:

- Health data at accommodation, guest, events and food and beverage services (e.g., allergies and disabilities)
- Health data at lifestyle services (e.g., allergies, pregnancy, skin type, health issues, smoking, stress condition)
- Health data related to accidents that resulted in injuries.
- Health data at Kids club (e.g. allergies, health issues)

Sensitive data is subject to specific processing conditions.

6. How and where we collect your data

- **Online services.** We collect data when you interact with our online services, by performing such actions as, but not limited to, browsing, making a reservation, purchasing goods and services from our website or Apps, communicating with us or otherwise connecting with us or posting to social media pages, or signing up for a newsletter or participating in a survey, contest or promotional offer.

- **Reservation services.** We collect data when you make a reservation over the phone, communicate with us by email, fax, or via online chat services or contact customer service.
- **Internet-connected devices.** We collect data from internet-connected devices available in our properties. For example, when you connect a device to Parklane's internet, or when a smart home assistant may be available for your use to tailor your accommodations and experience.
- **On-property providers.** We may collect your data from spa, restaurant, health club, concierge, and other outlets at Parklane.
- **Marriott Group.** We collect data within the Marriott 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.
- **Linked Accounts.** We collect data when you use your loyalty program number or Online Services login to receive or register for certain third-party services. These companies include businesses such as airlines and rental car providers, and restaurant reservation and car services partners. Additionally, your social media account provider allows you to connect your social media account to your Online Services account or log into your Online Services account from your social media account. When you enroll in those services, we disclose your personal data and Other Data to those third parties. If you do not want us to collect your personal data or Other Data in this way, do not provide your loyalty program number to third parties, do not use your Online Services login to register for third-party promotions and do not connect your Online Services account with accounts on third-party services.
- **eFolio Program.** If you are an employee of a company that participates in the Marriott Group eFolio Program and book your room using a company corporate code or pay for your expenses using a corporate credit card, we may collect personal data and Other Data related to your stay or employment. This Privacy Statement does not apply to the handling of your personal data by your employer, credit card company or bank, and we are not responsible for their practices.
- **Other Sources & Service Providers.** We collect personal data and Other Data from various third parties, such as public databases, joint marketing partners and online travel agencies (OTAs).

7. Purpose of processing and lawful base for processing

Parklane process data only if and to the extent that at least one of the following applies:

1. The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
2. Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract
3. Processing is necessary for compliance with a legal obligation to which the controller is subject
4. Processing is necessary to protect the vital interests of the data subject or of another natural person

5. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
6. Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, especially when the data subject is a child.

The following table presents for each purpose of processing the lawful base.

Purpose	Description of activities	Legal base
Booking & Guest Registration	There are several activities associated with this purpose, such as: facilitating reservations and bookings of accommodations and related services; engaging in pre-arrival communications (logistics, changes, preferences, etc.); and processing payments and security deposits.	<p>Performance of contract for the individual with the guest booking the room.</p> <p>Legitimate interests for the individual booking the room, for example, honoring his/her preferences, as well as for any individuals accompanying the primary guest (e.g., spouse, children, friends).</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p>
On-Site Reception & accommodation Services	There are a number of activities associated with this purpose, such as: facilitating check-in and check-out; processing payments; providing consistent and personalized service and advice about the on-site services (based on past usage or expressed preferences); providing concierge, luggage storage and parking services; making arrangements with third-party providers on behalf of guests (such as coordinating tours and other sightseeing excursions; arranging taxi, shuttle and chauffeur services; and facilitating reservations and bookings at restaurants and events); administering and facilitating access to	<p>Performance of contract, such as processing payments</p> <p>Legitimate interests, such as honoring the guest's preferences (e.g., for a room near the elevator or on a top floor).</p> <p>Consent, such as collecting information regarding dietary preferences that the guest chooses to provide</p> <p>Legal obligations, such as collecting national ID numbers where legally required</p> <p>Health data which is manifestly made public by</p>

Purpose	Description of activities	Legal base
	<p>Wi-Fi, TV and other connectivity services (including access to business center amenities, such as fax and photocopying services) and entertainment systems; facilitating in-room dining (including taking into account any dietary, health restrictions or other personal needs expressed by the guest); housekeeping services (including preferences for special pillows, duvets and other amenities expressed by the guest) and dry-cleaning services; handling customer requests, inquiries and complaints; and determining eligibility for age-restricted goods and services (such as alcohol or in-room adult entertainment).</p>	<p>the data subject (article 9.2 e of Regulation).</p>
<p>Conferences & Events</p>	<p>There are a number of activities associated with this purpose, such as: communicating with customers about conferences and other event planning ("Events"); facilitating reservation and bookings of Events; engaging in pre Event communications (logistics, accommodations, changes, etc.); preparing for and coordinating Events in accordance with customer instructions, expectations and preferences; facilitating catering; communicating about billing and recovering amounts owed; processing payments and security deposits; performing credit checks; handling customer requests, inquiries and complaints; and communicating with participants during Events.</p>	<p>Performance of a contract, such as collecting information regarding a planned event. Legitimate interests, such as responding to customer complaints or concerns relating to an Event. Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p>
<p>Parklane's Operations &</p>	<p>There are a number of activities associated with this purpose, such as: administering customer-care services to facilitate and address inquiries,</p>	<p>Performance of contract, such as ensuring that online services are functioning so that individuals can make</p>

Purpose	Description of activities	Legal base
General Business	<p>Comments and complaints about any of our services (such as in person, through phone lines, email, or on social media); handling security and fraud prevention; administering online services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and the hosting of data); monitoring and analyzing usage of services and using data analytics to improve services, marketing, programs, overall customer experience, gathering feedback, carrying out pilot programs for potential new services and both developing new and improving existing services; and facilitating mergers, acquisitions and other reorganizations and restructurings of our business (including prospective transactions).</p>	<p>reservations or manage loyalty accounts.</p> <p>Legitimate interests, such as responding to customer complaints and concerns which may include, where applicable law permits, recording customer service calls.</p> <p>Consent, such as for marketing programs.</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p>
Emergency & Incident Response	<p>There are several activities associated with this purpose, such as: ensuring the security of on-site services; responding to, handling and documenting on-site accidents and medical and other emergencies (including facilitating in-house doctor services); actively monitoring properties to ensure adequate incident prevention, response and documentation (including CCTV); requesting assistance from emergency services; and sending notifications and alerts in the event of incidents or emergencies (such as via SMS, email, call, audio-visual device prompts, etc.).</p>	<p>Performance of contract, such as ensuring the safety of guests and personnel through interactions with on-site security personnel.</p> <p>Legitimate interests, such as monitoring properties through CCTV to ensure the safety of guests and personnel</p> <p>Legal obligations, such as documenting on-site accidents.</p> <p>Individuals' vital interests, such as contacting medical or emergency services for an ill guest</p>
Legal & Compliance	<p>There are a number of activities associated with this purpose, such as: complying with applicable laws;</p>	<p>Legal obligations, such as complying with legal processes.</p>

Purpose	Description of activities	Legal base
	<p>complying with legal processes; responding to requests from public and government authorities; meeting national security or law enforcement requirements; enforcing our terms and conditions; protecting our operations; protecting the rights, privacy, safety, or property of the Parklane, guests, visitors and other relevant individuals; and allowing us to pursue available legal remedies and limiting the damages that Parklane may sustain.</p>	<p>Legitimate interests, such as enforcing terms & conditions to protect trademarks Individuals' vital interests, such as contacting emergency services and incidents involving guests. Health data to exercise or defense of legal claims or whenever courts are acting in their judicial capacity (article 9.2 f of Regulation).</p>
<p>Spa, Beauty & Fitness Services Kids Club</p>	<p>There are a number of activities associated with this purpose, such as: facilitating reservations and bookings; determining eligibility for services; honoring disability or other health-related restrictions and providing appropriate and safe activities, services and treatments; providing consistent and personalized service based on past usage and preferences expressed by the individual; processing payments; arranging requested professionals for specific treatments and services; and handling customer requests, inquiries and complaints.</p>	<p>Performance of contract, such as processing payments. Legitimate interests, such as providing personalized services Legal obligations relating to financial transactions, such as the obligation to maintain books and records Individuals' vital interests (e.g., when an individual becomes ill while using the fitness equipment) Health data – explicit consent (article 9.2a of Regulation)</p>
<p>Food & Beverage Services</p>	<p>There are several activities associated with this purpose, such as: facilitating reservations; honoring dietary preferences; providing consistent and personalized service based on past usage and preferences expressed by the individual; processing payments; arranging reservations; and handling customer requests, inquiries, and complaints.</p>	<p>Performance of contract, such as processing payments. Consent, such as collecting information about dietary, health restrictions, or personal needs of a guest when ordering food. Legitimate interests, such as providing personalized services (e.g., offering red</p>

Purpose	Description of activities	Legal base
Child-Related Services (for Parents & Legal Guardians)	There are several activities associated with this purpose, such as: facilitating babysitting / nanny, kids club; facilitating reservations and bookings; preparing for and coordinating accommodations and services in accordance with guest preferences, instructions and expectations; payment and billing services; dining services (for example, special menus for children or special discounts for breakfast for children under a certain age).	<p>wine to a guest based on previous requests).</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records.</p> <p>Individuals' vital interests (e.g., when an individual becomes ill in one of the restaurants)</p> <p>Health data which is manifestly made public by the data subject (article 9.2 e of Regulation).</p>
Loyalty Programs, Accounts, &	There are a number of activities associated with this purpose, such as: registering users in loyalty and other client account programs and payment	Performance of contract, such as assessing points and distributing benefits.

Purpose	Description of activities	Legal base
Relationship Management	card programs; determining eligibility for various programs and related services; administering loyalty programs; providing consistent and personalized service based on past usage and the preferences expressed by members; ensuring access to Online Services; processing payments; notifying members about changes to programs, terms and conditions; and handling members' requests, inquiries and complaints.	Consent, such as honouring the mode of communication preferences (e.g., email, SMS) Legitimate interests, such as managing members' choices regarding how they wish to earn, track, and use points. Legal obligations relating to financial transactions such as the obligation to maintain books and records

Marketing, Promotions, Contests & Third-Party Products	There are several activities associated with this purpose, such as: communicating about products and services that may be of interest to guests; providing personalized advertisements on selected websites, contests and other promotions (such as best vacation photo contests on social media); and handling customer requests, inquiries and complaints.	Performance of a contract, such as fulfilling obligations associated with a contest. Explicit consent, such as receiving information, leaflets and invitations, receiving promotions, communication preferences (e.g., email, SMS), use of images.
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8. Processing of personal preferences

Our goal is to serve you better and meet your expectations and preferred level of hospitality at each stage, from the moment that you book with us through to when you check out. See below to learn more.

Personal preferences	Purposes	Legal bases
Anniversaries	When you stay with us, we want to help you celebrate any special occasion, such as an anniversary or birthday. For example, we may make a note of these dates to allow us to provide you with a birthday or anniversary gift.	Consent, where applicable

Personal preferences	Purposes	Legal bases
<p>Activity type and hobbies (such as trips to beach, babysitting, fitness, travel and transportation details, kids club theater, restaurant etc.)</p>	<p>We want to ensure that we provide you with services that enhance your experience. To do this, we may retain your preferences about the types of activities that you like to take part in, so that we can ensure we are able to offer you similar experiences when you stay with us in the future.</p>	<p>Consent, where applicable</p>
<p>Relationships (husband, wife, son, daughter, etc.)</p>	<p>We understand that your Preferences may change depending on who you are traveling with (such as your preferred room type). We may keep a record of your relationships to assist us with making your stay as comfortable as possible. For example, if we know you are traveling with small children, we can proactively plan for additional accommodations such as a crib or roll-away bed.</p>	<p>Legitimate interest, to provide you with exceptional service</p> <p>Consent, where applicable</p>
<p>Preferences for properties, clubs, and facilities</p>	<p>When you are staying with us, we want to make sure that we can provide you with services to enhance your experience. To do this, we may retain your preferences for our properties, clubs, and facilities, based on your past stay preferences, of our kids' clubs, nanny services, spa and beauty services, restaurant, and fitness facilities.</p>	<p>Legitimate interest, to provide you with exceptional service</p> <p>Consent, where applicable</p>
<p>Dietary preferences</p>	<p>When you stay with us, we want to ensure that you are safe, that we are looking after your wellbeing, and to provide you with services to enhance your experience. For example, we may make a note of your dining or beverage preferences so that we are prepared if you request room service or dine at one of our cafes or restaurants.</p>	<p>Legitimate interest, to provide you with exceptional service</p> <p>Consent, where applicable</p>

9. Personal data of minors

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not allow your children to submit personal data without your permission. In the event we learn that we have collected personal data from a child under the age of 18 without verification of parental consent, steps will be taken promptly to remove that information.

10. Recipients of your personal data

Our goal is to provide you with the highest level of hospitality and Services, and to do so, we may share personal data and Other Data with the following:

- **Marriott Group.** We disclose data to Marriott 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. We share your data used for making reservations with the applicable property and Marriott entity to fulfil and complete your reservation.
- **Owners:** We disclose data to Parklane owners for the purposes described in this Global Privacy Statement. Owners have a limited right to use certain personal data for their own purposes and therefore qualify as independent data controllers for the following processing.
- **On-Property and/or Travel Providers.** We may share your information with spa, restaurant, health club, concierge and other outlets at our properties to provide you with services and their own marketing.
- **Linked Accounts.** We partner with certain third parties that allow you to enroll in their services. For example, certain companies allow you to use your loyalty program number or Online Services login to receive or register for their services. These companies include businesses such as airlines and rental car providers, and restaurant reservation and car services partners. Additionally, your social media account provider allows you to connect your social media account to your Online Services account or log into your Online Services account from your social media account. When you enroll in those services, we disclose your personal data and Other Data to those third parties. If you do not want us to share your personal data or Other Data in this way, do not provide your loyalty program number to third parties, do not use your Online Services login to register for third-party promotions and do not connect your Online Services account with accounts on third-party services. Data shared in this way will be governed by the third party's privacy policy and not this Privacy Statement.
- **eFolio Program.** If you are an employee of a company that participates in the Marriott Group eFolio Program and book your room using a company corporate code or pay for your expenses using a corporate credit card, an extract of your folio detailing the goods and services provided to you may be sent to your company and to the credit card company. This Privacy Statement does not apply to the handling of your personal data by your employer, credit card company or bank, and we are not responsible for their practices.

- **Service Providers.** We disclose personal data and Other Data to third party service providers including, for example, 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.

11. Transfer of personal data to third countries or international organisations

The Marriott Group is a global organization and provides a global service. Transferring data internationally is essential to the Services so that you receive the same high-quality service wherever you are in the world. As a result, we will, subject to law, transfer personal data and Other Data collected in connection with the Services, to entities in countries where data protection standards may differ from those in the country where you reside, including outside the EEA, UK, or Switzerland. By making a reservation, visiting, or staying at a Marriott branded property or using any Marriott Group branded service, you understand that we transfer your personal data globally.

In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal data.

Some of the countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards. The Marriott Group enters Standard Contractual Clauses or another approved mechanism for cross-border transfer where appropriate.

12. Retention period of personal data

Parklane will retain your data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

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 have an account with us or keep using the 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)

13. Your rights

We want to make sure that you are fully in control of your personal data. You have multiple rights, and we want to ensure they are respected.

1. **The right to access** – You have the right to request a copy of the information that we hold about you. You have the right to confirmation as to whether we process your personal data

and, where we do, access to the personal data, together with certain additional information. Such additional information includes inter-alia, details of the purposes of the processing, the categories of personal data concerned and the categories of recipients of the personal data. The right to obtain a copy of your data shall not adversely affect the rights and freedoms of others.

2. **The right to rectification** – You have a right to correct data that we hold about you that is incomplete or inaccurate. You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.
3. **The right to erasure (right to be forgotten)** – where certain criteria are met you can ask for the data we hold about you to be erased from our records. In some circumstances you have the right to obtain the erasure of your personal data without undue delay. Those circumstances include cases where (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) you withdraw consent on which the processing is based solely on consent; (iii) you object to processing which is based on our legitimate interests and there are no overriding legitimate grounds for the processing; (iv) the processing is for direct marketing purposes; (v) the personal data have been unlawfully processed; and (vi) the personal data have to be erased for compliance with a legal obligation to which we are subject.; The above shall not apply where processing is necessary (i) for exercising the right of freedom of expression and information; (ii) for compliance with a legal obligation which requires processing by a law to which we are subject; and (iii) for reasons of public interest; or for the establishment, exercise or defense of legal claims.
4. **The right to restriction of processing** – where certain criteria are met you can ask to restrict the processing. In some circumstances you have the right to obtain from us the restriction of processing of your personal data. Those circumstances include cases where (i) you contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data; (ii) processing is unlawful but you oppose erasure and you request the restriction of their use instead; (iii) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and (iv) and you have objected to processing which is based on our legitimate interests, pending the verification of that objection. Where processing has been restricted on the basis of the above, we will continue to store your personal data. However, we will only otherwise process it (i) with your consent; (ii) for the establishment, exercise or defense of legal claims; (iii) for the protection of the rights of another natural or legal person; or (iv) for reasons of important public interest.
5. **The right to object to processing** – you have the right to object to certain types of processing.
You have the right to object to the processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is not necessary for (i) the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or (ii) the purposes of the legitimate interests pursued by us or by a third party. If you make such a request, we will cease to process the personal data unless we have compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for

the establishment, exercise or defense of legal claims. Additionally, you have the right to object when your personal data are processed for the purposes of direct marketing, including profiling.

6. **The right to data portability** – where certain criteria are met you have the right to have the data, we hold about you transferred to another organisation. You have the right to receive personal data which you have provided to us in a structured, commonly used and machine-readable format and the right to transmit those data to another data controller. However, please note that this right to data portability only arises where (a) the processing is based on consent (as and where applicable) or is necessary for the performance of a contract to which you are a party; and (b) the processing is carried out by automated means (as and if applicable). In conforming to such requests, we will not adversely affect the rights and freedoms of others.
7. **The right to withdraw consent** (when and if “consent” legal basis is applicable) – where certain criteria are met you have the right to withdraw your consent. To the extent that the legal basis for our processing of your personal information is consent (as and where applicable), you have the right to withdraw that consent at any time such withdrawal will not affect the lawfulness of processing before the withdrawal.
8. **The right to lodge a complaint to a supervisory authority.** You have a right to lodge a complaint with the Office of the Commissioner for the Protection of personal data in Cyprus at any time.

If you wish to exercise any of your rights (including withdrawal of your consent), please send a written request to Parklane’s designated Data Protection Officer (DPO), whose contact information you can find below:

Tel: 25862000 e-mail: dpo@parklanecyprus.com

Parklane shall reply to your request without delay, within (1) one month after receiving it and without any cost for you. The above time-period might be extended for two (2) more months, due to the complexity or the number of the requests. In such a case you will be informed for the time extension and the reasons for it, as soon as possible and in any case within (1) one month from the time at which your request was received.

If your requests are obviously unfounded or excessive particularly because of their recurring nature, we may impose a reasonable fee, considering the administrative costs for providing information or performing the requested action, or refuse to respond to the request justifying the answer to you.

In case you believe that your request has not been satisfied sufficiently or your right in protecting your personal data has been violated by our processing, you have the right to lodge a complaint with the Office of the Commissioner for personal data Protection (<http://www.dataprotection.gov.cy/>).

14. Measures to ensure security of processing

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.

15. Personal data breaches

In the case of a personal data breach, Parklane shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to Office of the Commissioner for personal data Protection, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the Commissioner is not made within 72 hours, it shall be accompanied by reasons for the delay. Parklane shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken.

16. Further information

If you have any questions about this Privacy Statement, please contact us at dpo@parklanecyprus.com

17. Modifications of present Privacy Policy

We may change this privacy statement to reflect changes at any time. The most recent version of the privacy statement is reflected by the version date located in the top of this document. All updates and amendments are effective immediately upon notice, which we may give by posting a revised version of this Privacy Statement on the Website. We encourage you to review this Privacy Statement often to stay informed of changes that may affect you.

If you would like to review the version of the Privacy Statement that was effective immediately prior to this revision, please contact us at dpo@parklanecyprus.com