

# PERSONAL DATA PROTECTION POLICY

This Policy was updated on 24/07/2018

## 1. Purpose of this policy

- 1.1. The protection of your personal data is very important to MAKEDONIA PALACE. This policy aims at informing you on the information collection practices of MAKEDONIA PALACE, including the categories of data it may collect, retain and process, the purpose of their collection, the categories of persons to whom the data are communicated and your rights. MAKEDONIA PALACE makes every possible effort to protect your personal data, on the condition that the personal data you have provided are true and accurate.
- 1.2. It also outlines certain security measures taken by the company in order to protect data confidentiality and provides certain guarantees for things the company will not do.

## 2. Legal and regulatory framework

- 2.1. The management and protection of the personal data of visitors/users of the services of MAKEDONIA PALACE are governed by the terms hereof, the relevant provisions of the General Data Protection Regulation [EU **General Data Protection Regulation (GDPR)** - Regulation (EU) 2016/679] (hereinafter referred to as the "Personal Data Protection Regulation") on the protection of natural persons with regard to the processing of personal data, the decisions-recommendations of the Hellenic Data Protection Authority, and other relevant Greek laws and provisions, as well as this Personal Data Protection Policy.
- 2.2. We reserve the right to change the terms of personal data protection after informing visitors/users and within the existing or any future legal framework.
- 2.3. If you do not agree with the terms of personal data protection provided for in this section, you must refrain from using the services of MAKEDONIA PALACE. You are not obligated to provide the personal information requested, but if you choose to omit this action, we will not be able to offer our products or services or answer any of your questions in several cases.

## 3. Commitment of MAKEDONIA PALACE

- 3.1. We at MAKEDONIA PALACE consider the protection of the privacy and data of our customers to be of the utmost importance and are committed to providing all our customers with personalised services that meet their requirements in a manner that safeguards their privacy.
- 3.2. Your personal information (personal data) is used exclusively by MAKEDONIA PALACE and its employees in order to respond to your requests and better serve you, in accordance with this policy. The persons who handle personal information are trained for using appropriate procedures. The representatives and service providers of MAKEDONIA PALACE are required to keep your personal information private and not to use them for any purpose other than those serving the provision of specific services to us.
- 3.3. In addition, MAKEDONIA PALACE may ask you in certain cases if we could share information with other reliable third parties. We will inform you when collecting such information if we expect this kind of information sharing with certain third parties, and MAKEDONIA PALACE will define the types of businesses at the relevant point of collecting the information, describe the type of information to be shared (such as your address or e-mail address) and share the data with other parties only if you agree. MAKEDONIA PALACE will share the personal data only of those who have agreed, as part of our cautious policy.

## 4. What type of data does MAKEDONIA PALACE collect?

- 4.1. Any information within the meaning of personal data under the Personal Data Protection

Regulation, the collection of which is not based on the law or the conclusion or execution of a contract, is collected by MAKEDONIA PALACE only in the event that you choose to expressly consent.

4.2. We collect the following personal data

Identification Data	Full name, identity card/passport number, date of birth, telephone number
Contact Data	Postal address, e-mail address, telephone number
Transaction Data	TRN, type, place, time of products or services provided
C o n t r a c t u a l Relationship Data	Contractual documents, information and consent forms, electronic statements of intention
T r a n s a c t i o n a l Behaviour Data	Information concerning interests, preferences and participation in events, contests, surveys.

4.3. We do not collect or acquire any type of access to special categories of (“sensitive”) personal data or data that concern criminal convictions and offences of our customers. Customers are obligated to abstain from providing such data that concern them or third data subjects. In the event that customers provide such data to MAKEDONIA PALACE, these data will be deleted as soon as MAKEDONIA PALACE is made aware of them. We at MAKEDONIA PALACE bear no liability whatsoever towards customers or third parties for any provision and/or processing of sensitive data due to acts or omissions on the part of customers in breach of the above obligation.

4.4. Visits to the website of MAKEDONIA PALACE ([www.makedoniapalace.com](http://www.makedoniapalace.com)) does not absolutely require the provision of any type of personal data on your part. However, in several cases, it is necessary for you to provide specific personal data indicated in the corresponding data entry fields on the website of MAKEDONIA PALACE.

4.5. We at MAKEDONIA PALACE GROUP may collect and store the following personal information about you from the following exhaustive list of sources::

4.5.1. Contact data when you contact us to submit questions or requests or to ask information concerning the services provided by MAKEDONIA PALACE

4.5.2. identification data, communication data, transactional data, contractual relationship data and transactional behaviour data when you book a room or a table at the restaurant, irrespective of the means used to complete the booking (electronically, via telephone, via the reception desk, etc.)

4.5.3. identification data, communication data, transactional data, contractual relationship data and transactional behaviour data when you conclude transactions, within the context of using the Turkish bath services provided within our hotel, with the lessee of the space in question, the company ‘MAK HAMMAM PRIVATE COMPANY’

4.5.4. identification data, communication data, transactional data, contractual relationship data and transactional behaviour data when you conclude an agreement with us for the provision of any services by MAKEDONIA PALACE

4.5.5. identification data, communication data, transactional data, contractual relationship data and transactional behaviour data when you electronically purchase products or services provided by MAKEDONIA PALACE

4.5.6. from publicly available sources.

4.6. The data collected through the MAKEDONIA PALACE website may also be combined with data provided in other cases, e.g. when you call its call centres or participate in contests and promotional actions. The personal data provided to MAKEDONIA PALACE in these cases may be incorporated in existing databases and stored in order to simplify the systems used to manage your data.

5. For which purposes does MAKEDONIA PALACE collect personal data?

5.1. MAKEDONIA PALACE collects personal or non-personal data from you for the following purposes:

5.1.1. **Transactions:** MAKEDONIA PALACE may use your personal data to process any transactions concluded with you, such as credit card payments for tickets, season tickets, etc.

5.1.2. **Advertising/Marketing:** MAKEDONIA PALACE may use the personal or non-personal data of visitors/users for information purposes and promotional actions concerning contests, gifts,

discounts on products and services of MAKEDONIA PALACE and associated companies and sponsors.

**5.1.3. Improvements and adjustments to the website:** MAKEDONIA PALACE will use this information solely for the reasons for which they were collected and in order to provide you with information. It will also use this information in order to adapt the content of the website to your needs and to improve its compositions, changes and dynamism.

**5.1.4. Legal use:** MAKEDONIA PALACE may collect, store, disclose and, generally speaking, process your personal data when this is required by the Personal Data Protection Regulation and/or the law or when necessary in order to protect our interests and your interests.

## **6. Use of information**

6.1. The information you provide to MAKEDONIA PALACE or which MAKEDONIA PALACE holds may be used by the company:

6.1.1. to ascertain your identity when you ask questions,

6.1.2. to help us manage affairs and communicate with you in order to improve the management of the services and products that were, are being or will be provided by the company,

6.1.3. to carry out marketing analysis and create customer profiles and statistical information,

6.1.4. to help us prevent and identify fraud or loss, and

6.1.5. to contact you using any means (including post, e-mail, telephone, etc.) in regard to other services and products offered by MAKEDONIA PALACE and select, authorised associates.

## **7. Data storage**

7.1. We at MAKEDONIA PALACE store your personal data solely for the time required to provide a service you requested or approved, without prejudice to any legal provisions to the contrary, as is the case with issues governed by commercial and/or taxation legislation, the various applicable provisions, etc. In any event, the personal data you provide us and which are recorded in written agreements, contracts and electronic correspondence concerning the execution of a contract or the realisation of a commercial transaction are stored for a period of 20 years in a physical and electronic archive kept at the legal department, the sales/contracts department and the accounting department of MAKEDONIA PALACE or any other third party that directly or indirectly provides the above services or assists the departments in question in the discharge of their duties or provides management services to us.

## **8. Cookies and Webbeacons**

8.1. 'Cookies' are data files sent by websites to your computer when you browse that website. These data files contain data that allow our website to remember important information that will make your use of the website more efficient and useful. Our website uses cookies for various purposes. We use cookie technology and IP address to obtain non-personal information concerning visitors to each website and in order to provide registered visitors with the best personalised online experience.

8.2. **How do we use cookies?** Visitors to the MAKEDONIA PALACE website use different Internet browsers and computers. In order to further facilitate your visits using your technology of choice, we automatically record the browser and operating system used by each visitor, as well as the name of the Internet service provider of each visitor. We also record the total number of visitors to the website in an aggregated manner in order to update and improve our website. No personal information is exported through this process. These data show us whether more visitors prefer specific functions or sections of the website over others, which helps us keep our website up to date with new material that is interesting for the majority of our visitors. In particular, we use the following kinds of Cookies:

8.2.1. Remarketing Cookies ( Facebook Pixel, AdWords): Remarketing shows ads to people who've visited your website or used your mobile app. When people leave your website without buying anything, for example, remarketing helps you reconnect with them by showing relevant ads across their different devices.

8.2.2. Carthook: Active Campaign offers integrated email marketing, marketing automation, and small business CRM. You can send beautiful newsletters, setup behavioral based automations, and benefit from sales automation.

8.2.3. Active Campaigns: Active Campaign offers integrated email marketing, marketing automation, and small business CRM. You can send beautiful newsletters, setup behavioral based automations, and benefit from sales automation.

8.2.4. Moosend: Email marketing and marketing automation software. Design and send beautiful campaigns or start personalized conversations and engage with them at scale.

8.3. **How do we use cookies to personalise your experience on our website?** Cookie technology helps us provide information that fits the interests of visitors and allows us to facilitate

registration, participation in lotteries and contests, and access to other functions available on our website for visitors. Where allowed, we may correlate personal information with a cookie file in such cases.

- 8.4. **What if you do not wish to accept cookies?** If you do not wish to accept cookies, your computer can be set to alert you each time a cookie is sent to it, or you can disable the download of all cookies by your Internet browser. (Check the Help menu of your browser to learn how you can change or correctly update your cookies settings).
- 8.5. **What are webbeacons and how does the Company use them?** Some of the webpages and newsletters of MAKEDONIA PALACE may contain electronic images called webbeacons, also known as one-pixel GIF files, pure GIF files or pixel tags. Their use on websites allows the counting of visitors who have accessed the pages of MAKEDONIA PALACE. Their use in our product/service promotion e-mail messages and newsletters allows us to measure how many registered users have read the material we are sending. Webbeacons allow us to develop statistical information about the activities and functions that are most interesting to our visitors/users in order to provide more personalised material. They are not used to access personal information without your consent.
- 8.6. Disabling cookies may affect your ability to use certain products/services on the MAKEDONIA PALACE website.
9. **Credit check**
- 9.1. In certain cases, MAKEDONIA PALACE may carry out certain credit checks with the competent bodies when you request a service or product. If this applies, then it will be listed in the terms and conditions of the activity between you and MAKEDONIA PALACE or the company that will carry out the processing.
10. **Submission of CVs**
- 10.1. MAKEDONIA PALACE collects CV data and accompanying documents directly and solely from individuals interested in cooperation, as these are absolutely necessary in order to assess their suitability for the cooperation in question. It should be noted that through this (voluntary) submission/dispatch of personal data and information contained in the above CV and the accompanying documents, interested parties consent to the collection, storage, use, processing and transmission of these data for the purposes referred to herein. MAKEDONIA PALACE takes all the necessary technical and other measures for the secure processing of the personal data of interested parties who submit CVs.
- 10.2. The personal data contained in CVs are accessed solely, where necessary and depending on the processing purpose, by the authorised staff of MAKEDONIA PALACE and/or the staff of third-party associated (advertised) companies ('Processors' or 'Controllers' for whom MAKEDONIA PALACE is the 'Processor') with which MAKEDONIA PALACE has concluded agreements, under the condition of compliance with the relevant confidentiality obligations included in the relevant agreements. Data (if applicable) are processed by MAKEDONIA PALACE and are sent to interested-advertised companies. MAKEDONIA PALACE shall not disclose, sell, exchange, assign or otherwise provide personal data from the CVs collected and processed to third parties, whether natural or legal persons, without the consent of the individuals they concern, **except** in the cases noted above for the needs of covering a vacant post and the selection process **and due** to the legitimation of Article 6(1b) of the General Regulation. These companies shall process data exclusively for the needs of their cooperation with MAKEDONIA PALACE.
- 10.3. As regards personal data transmitted by interested parties in the context of sending or submitting CVs, the purpose of processing is the intention of concluding a cooperation agreement following an application by the interested party ("Data Subject"), the control of their qualification prior to the conclusion of the agreement (Article 6(1b) of the General Regulation), the minimum processing of these data necessary to assess the CV and whether its contents cover the needs of the specific position of cooperation with MAKEDONIA PALACE or associated-advertised companies, and the protection of the interests of MAKEDONIA PALACE. Furthermore, the ranking of interested parties in advertising programmes of the company, the need of communication between MAKEDONIA PALACE and the 'Subject', use of data (e.g. photographs) on the company's social networking media for the promotion of its actions. It is clear that if interested parties are ranked in advertising programmes of MAKEDONIA PALACE, the photographs submitted or received during these programmes shall be used on social networking media on its account. This processing is carried out by the company solely for the purposes set out and does not extent to any other processing purposes.
- 10.4. If the consent of the parties interested in cooperation has been obtained, CV data shall be stored by MAKEDONIA PALACE for purposes of future ranking in advertising programmes

of use/evaluation, in the event of new positions of cooperation with MAKEDONIA PALACE, for a period of 24 months after submission, following which they shall be destroyed/erased/anonymised in a secure manner. If no such consent is obtained, after the coverage of the employment position in question for which interested parties sent or submitted their CV, the CV data shall be destroyed/erased/anonymised in a secure manner within a period of 1 month from the coverage of the position, unless MAKEDONIA PALACE is legally entitled or obligated to retain such data. The latter case occurs when interested parties do cooperate with MAKEDONIA PALACE, in which case the CV and its accompanying documents (photographs etc.) shall be sent to associated companies for ranking in advertising programmes for the duration of the project agreement or the cooperation. Furthermore, any additional data that are requested and are necessary for the needs of insurance-taxation legislation shall be processed solely for purposes directly related to cooperation with ranked individuals. Upon the expiry or termination of the cooperation period, such data shall be retained for the period required by law, following which they shall be destroyed/erased/anonymised in a secure manner.

**11. Disclosure of information**

- 11.1. We at MAKEDONIA PALACE may transmit your personal data to strategic partners and associates, exclusively in order to fulfil the purpose for which you provided these data to us. MAKEDONIA PALACE shall in no case transmit your personal data to third parties for purposes other than those for which you granted your consent or by way of derogation from our legal or contractual obligations. However, we may transmit such data to associates or sponsors, e.g. for promotional purposes and their contact with you, solely if you have granted prior consent.
- 11.2. We may transmit personal data to associates or sponsors, e.g. for promotional purposes and their contact with you, solely if you have granted prior consent.
- 11.3. We shall in no case sell or rent your personal data to third parties. These data are used exclusively by MAKEDONIA PALACE in order to continuously improve our customer service.
- 11.4. MAKEDONIA PALACE may disclose information solely if legitimately requested for legal or regulatory purposes, in the context of judicial proceedings and/or potential legal proceedings.

**12. How safe are your data?**

- 12.1. MAKEDONIA PALACE employs strict security measures and safeguards to protect your personal data. This includes a number of administrative measures, security policies, procedures and practices to verify your identity when you call us, data encryption on our website, creation of data backup copies off-site, etc. in order to ensure compliance with all applicable legal requirements.
- 12.2. We at MAKEDONIA PALACE employ security measures at a technical and organisational level aiming at the security of the data collected from you against any intentional or unintentional attempt of handling, loss, destruction and, generally speaking, access to them by unauthorised individuals. Where personal data is collected and processed, the information in question will be transmitted in encrypted form so as to prevent any abuse of the data in question by any third party. Our security measures undergo continuous controls and updates in accordance with the latest technological developments.
- 12.3. Access to your personal data is limited solely to employees authorised for this purpose, so that they may provide you with products and services by accessing these data.
- 12.4. Physical, electronic and procedural safeguards, harmonised with personal data protection regulations, have been activated.
- 12.5. We at MAKEDONIA PALACE take every precaution possible to keep your personal data safe. However, due to the nature of the Internet, MAKEDONIA PALACE cannot guarantee the protection of communications or the data stored in its browsers from any unauthorised access by third parties.

**13. Internet Access**

- 13.1. If you contact MAKEDONIA PALACE through the Internet, then we may occasionally use e-mail to contact you regarding our services and products, if you have granted consent to this effect.
- 13.2. You must be aware that communication through the Internet, such as e-mail messages etc., is not secure unless it has been encrypted.
- 13.3. MAKEDONIA PALACE bears no liability whatsoever for any unauthorised access or loss of your personal information beyond the control of MAKEDONIA PALACE.
- 13.4. **Privacy Policy and Children:** This website has been designed and is intended to be used by adults. If you are under-age below the age limit for which parental consent is required in your country, you must check the terms of this Privacy Statement in the company of your parent or

- guardian to ensure that you comprehend and accept these terms. If it is found that we have collected the information of a minor without the consent of their parent or guardian when such consent should have been obtained, we will delete the information in question as soon as possible. Access to certain sections of the website and/or the possibility of receiving prizes, product samples or other gifts may be limited for users below a certain age. We may use your personal data to conduct age verification checks and to apply these age restrictions.
- 13.5. **IP Addresses:** The IP address through which the visitor's / user's / member's Personal Computer (PC) accesses the Internet and, subsequently, the Website/Application is stored and may be used by the website, if necessary, in the event of infringement of the Terms of Use of the Website/Application on the part of the visitor / user / member.
- 13.6. **Access to your Account:** If you log in to our Services via a personal account, you will remain connected until you Log off from your account. If you are using a public computer or sharing your device with another user, we recommend that you log off and delete cookies from the device each time you use the Platform so as to protect your account and your Personal Information. Otherwise, all other users of the device will be able to see and gain access to your account.
- 13.7. **Contact through the platform website:** Should users contact us through the contact form or any other manner, they provide personal data voluntarily and exclusively of their own free will. We will process the personal data in question solely to the extent that it is necessary for the specific purpose.
- 13.8. **Social Networking Sites:** Our Website may offer the possibility to share items on Social Networks and other related tools that allow you to share your actions on the Website to other applications, websites or mass media, and vice versa. The use of such features allows the exchange of information with your friends or the public in general, depending on the settings you have set on your personal profile. Please consult the privacy policies of these social networking services for further information on how they handle your data.
- 13.9. **Special Categories of Data:** We ask that you do not send us sensitive personal data via e-mail or disclose such data through the contact platform. The processing of personal data of this category does not serve the processing purpose set forth above in any event.
14. **Monitoring of communication**
- 14.1. All communication between MAKEDONIA PALACE and you (including telephone conversations, e-mail messages, etc.) may be monitored and recorded by MAKEDONIA PALACE for security, quality assurance, legal, regulatory and training purposes.
15. **What are your rights?**
- 15.1. Under the Personal Data Protection Regulation [EU General Data Protection Regulation (GDPR) 2016/679], as in force, you have the following rights:
- a) the right to access;
  - b) the right to rectification;
  - c) the right to erasure, under certain conditions, such as when processing is no longer necessary for the purpose for which the data were initially collected and there is no imperative reason to continue processing (or storing) your information;
  - d) the right to restriction of processing;
  - e) the right to data transmission;
  - f) the right to object and the right not to be subject to a decision based solely on automated processing, including profiling;
  - g) the right to lodge a complaint with a supervisory authority.
- 15.2. In other words, you have the right to receive, upon request, free information on the personal data we have stored that concern you, to object, upon request, to the processing of data that concern you, valid thenceforth, and to withdraw your consent, and, in accordance with the applicable provisions, the right to rectification, restriction of processing, data transmission, erasure of the data in question and the right to lodge a complaint with a supervisory authority.
- 15.3. In such cases, please contact the competent Personal Data Protection department of the Company listed below in writing via original letter or fax or e-mail.
16. **Applicable Law and other terms**
- 16.1. The above terms and conditions of use of MAKEDONIA PALACE and any amendment, modification or alteration thereof are governed and supplemented by Greek law, EU law and the relevant international treaties. Should any of the above provisions become incompatible with the law, it shall automatically cease to apply and shall be removed, without affecting the validity of the remaining terms.
- 16.2. This text constitutes the entire agreement between MAKEDONIA PALACE and visitors/users

of the website and its services, and is only binding on them.

- 16.3. No amendment to these terms shall be taken into consideration and shall constitute a part hereof unless worded in writing and incorporated herein.

**17. Amendments**

- 17.1. MAKEDONIA PALACE may amend, adjust and update this policy periodically, publishing a new version on its website. You must check this page regularly to ensure that you are satisfied with any changes to this policy. MAKEDONIA PALACE will notify you of changes to this policy via e-mail or the private messaging system used on our website.

**18. Links**

- 18.1. Our website may contain links to other websites. This personal data protection statement does not apply in regard to the access of users to other websites.

**19. Contact**

- 19.1. MAKEDONIA PALACE hereby notifies you that it appoints Eleni Chrysosopoulou, daughter of Dimitrios, as its Data Protection Officer, who can be contacted at the following e-mail address: [dpo@makedoniapalace.gr](mailto:dpo@makedoniapalace.gr)
- 19.2. Any questions or recommendations can be addressed to the e-mail address below. Constant Internet developments in general necessitate the adaptation of our rules concerning the protection of online data from time to time. MAKEDONIA PALACE reserves the right to make any recommended changes to these rules at any time.
- 19.3. Contact address: [dpo@makedoniapalace.gr](mailto:dpo@makedoniapalace.gr).