

PRIVACY POLICY
GRAND HOTEL CRAVAT

(Last update: February 2019)

This privacy policy applies to the processing of personal data concerning:

- GRAND HOTEL CRAVAT's clients;
- visitors of the GRAND HOTEL CRAVAT's website (www.hotelcravat.lu)

("you").

GRAND HOTEL CRAVAT committed to hand your personal data in compliance with applicable data protection laws, including as of 25 May 2018, the General Data Protection Regulation ("**GDPR**").

This privacy policy explains how we collect, use, store, and share your personal data, as well as the options you have to control your personal information when you use our services and in particular the following:

- 1. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?**
- 2. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU, FOR WHICH PURPOSES AND ON WHAT BASIS ?**
- 3. HOW WE OBTAIN YOUR PERSONAL DATA ?**
- 4. WHO WE SHARE YOUR PERSONAL DATA WITH ?**
- 5. WHICH COUNTRIES WE TRANSFER YOUR PERSONAL DATA TO?**
- 6. COOKIES**
- 7. HOW LONG WE KEEP YOUR PERSONAL DATA ?**
- 8. YOUR RIGHTS REGARDING YOUR PERSONAL DATA**

1. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Your personal data is processed by Grand HOTEL-CRAVAT S.à r.l., a limited liability company, registered with the Luxembourg Business Registers under the registration number B 226020 ("**GRAND HOTEL CRAVAT**" or "**we**").

Under the GDPR, GRAND HOTEL CRAVAT is the "data controller" in respect of the processing of your personal data.

For any concerns regarding your personal data feel free to contact our representative or management by:

- e-mail: contact@hotelcravat.lu; or
- telephone: +352 22 19 75; or
- fax (if available) : +352 22 67 11; or

- regular mail: GRAND HOTEL CRAVAT S.à r.l., 29, Boulevard Roosevelt, L - 2450 Luxembourg.

2. WHAT PERSONAL DATA DO WE COLLECT ABOUT YOU, FOR WHICH PURPOSES AND ON WHAT BASIS ?

Who is concerned ?	What personal data do we collect ?	For which purposes ?	On what basis?	Are you required to provide us with your personal data ?
CLIENTS	<p>Identification and contact information, such as your name, surname, email, phone number(s), address (street, city, country of residence)</p>	<p>In order to provide you with the requested services notably:</p> <ul style="list-style-type: none"> ○ manage your reservation and accommodation request; ○ manage your stay at our hotel (e.g. provide you access to rooms); ○ handle your claims and concerns; ○ process payments. 	<p>Processing is necessary for the performance of the contract to which you are party and in order to take steps at your request prior to entering into the contract.</p>	<p>The provision of this type of personal data is necessary to provide you with the requested services.</p> <p>If you do not provide us with this information we will not be able to enter into a contract with you and offer you accommodation.</p>
	<p>Personal data contained in the traveller accommodation form, namely your name, first name(s), date of birth, place of birth, nationality, ID card or passport number, postcode, city and country of residence, street number and street, date of arrival, presumed date of departure, purpose of the stay (business/congress or leisure/other), the total number of persons accompanying the main traveller (including all the children and all the persons travelling in a group).</p>	<p>In order to complete and retain traveller accommodation forms.</p>	<p>Processing is necessary for compliance with our legal obligation to complete and retain traveller accommodation forms.</p>	<p>Under the Law of 24 June 2008 on the control of travellers in accommodation establishments, you are legally required to provide us with these personal data in the following cases:</p> <ul style="list-style-type: none"> ○ if you are the main traveller; or ○ if you travel in a group or if you attend an organized trip and you are the person in charge of the group/trip. <p>In addition, you must show us your ID document (such as ID card or passport) to allow us verifying whether the personal data you provided us with is accurate.</p> <p><i>*street number and street are optional indications.</i></p> <p>If you travel in a group or if you attend an</p>

				<p>organized trip and you are not the person in charge of the group/trip, you will have to provide us with the following personal data:</p> <ul style="list-style-type: none"> ○ name; ○ first name; ○ date and place of birth. <p>If you do not provide us with your personal data according to the legal requirements described above, we will not be able to offer you accommodation in our hotel.</p> <p>Inaccurate data could result in a fine of EUR 25 euros to EUR 250, without prejudice to other penalties which might be applicable under the Criminal Code.</p>
	<p>Payment-related information such as name and surname of the credit card holder, credit card number</p>	<p>In order to process payments and manage payment-related claims.</p>	<p>Processing is necessary for the performance of the contract to which you are party.</p>	<p>The provision of this type of personal data is necessary to provide you with the requested services.</p> <p>If you do not provide us with this information we will not be able to enter into a contract with you and offer you accommodation.</p>
	<p>Your preferences such as room facilities, room size, type of bedding</p>	<p>In order to provide you with the requested services notably:</p> <ul style="list-style-type: none"> ○ manage your reservation and accommodation request; ○ manage your stay at our hotel (e.g. provide you access to rooms); ○ handle your claims and concerns. 	<p>Processing is necessary for the performance of the contract to which you are party.</p>	<p>The provision of this type of personal data is necessary to provide you with the requested services.</p> <p>If you do not provide us with this information we will not be able to enter into a contract with you and offer you accommodation.</p>

VISITORS OF THE WEBSITE	Cookies	In order to improve the browsing experience on our website www.hotelcravat.lu .	Processing is necessary for the purposes of our legitimate interest to improve the quality of our website www.hotelcravat.lu .	The provision of this data is optional. For more information please see the Section 6. Cookies below.
	Identification and contact information , such as your name, surname, email, address, postal code, city, country of residence	In order to allow you to contact us via the contact form available on our website www.hotelcravat.lu .	Processing of this data is based on your consent.	The provision of this data is mandatory if you wish to contact us using the contact form available on our website www.hotelcravat.lu . Without this information we will not be able to process your request.

3. HOW WE OBTAIN YOUR PERSONAL DATA ?

We may collect the above-identified personal data directly from you on several occasions such as:

- when you book a room;
- when you check-in or pay for your stay;
- when you navigate on our website www.hotelcravat.lu;
- when you complete the contact form available on our website www.hotelcravat.lu.

4. WHO WE SHARE YOUR PERSONAL DATA WITH ?

We must share the traveller accommodation form containing your personal data with the Grand Ducal Police (Police grand-ducale) and subsequently with the STATEC (the Luxembourg national institute of statistical information and of economic researches) in order to comply with our legal obligations.

We may share your personal data with the following service providers:

Name and address of the provider	Countries where your data may be stored	Type of service	Concerned data
Amazon Web Services Inc. 410 Terry Avenue North Seattle, Wa 98109-5210 USA	Germany, France, Ireland	Website hosting	The data you provide us with by completing the contact form available on our website (https://www.hotelcravat.lu/en/contact)
Google Llc 1600 Amphitheatre Parkway Mountain View, CA 94043 USA	European Union Member States & United States of America	Analytics statistics (Google Analytics), social media (Google+), Google fonts	Cookies: page views, clicks, technical data of the browser and the tool used to connect to our website www.hotelcravat.lu .

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We may also share your personal data with other trusted third parties in accordance with contractual agreements in place with them, including:

- our local national processor for payment purposes;
- our IT service providers for our client management system of bookings and stay;
- if you stay at our hotel as part of a group, information collected for the group stay may be shared with the organizers of the group stay;
- other selected partners: we may help arranging rental cars or taxi services and may share personal data with our business partners in order to provide you with the requested services;
- our corporate travel partners to help them assess their travelling policies;
- our business booking partners.

5. WHICH COUNTRIES WE TRANSFER YOUR PERSONAL DATA TO?

Our website uses Google Analytics, a service provided by Google LLC. In this framework, your personal data, namely cookies (page views, clicks, technical data of the browser and the tool used to connect to our website www.hotelcravat.lu) may be stored in the United States of America. The transfer of this data is based on the Privacy Shield Mechanism.

Privacy Shield is an adequacy decision of the European Commission which can be used as a valid legal ground for personal data transfers to the United States of America under Article 45 of GDPR. The European Commission has determined that certain countries outside of the European Economic Area (EEA) adequately protect personal data. You can review current European Commission adequacy decisions on the European Commission's website (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en#dataprotectionincountriesoutsidetheeu).

To learn more about the Privacy Shield program, and to view Google's certification, please visit the Privacy Shield website (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

6. COOKIES

What are cookies ?

Cookies are pieces of information stored on your hard drive by the server of websites you visit. They are sometimes stored on your device in a simple text file, accessed by a server to read and record information.

We use several types of cookies:

Essential cookies

This kind of cookies is essential for the running of our website. If these cookies are blocked by the browser, you may no longer be able to enjoy certain features of our website. These cookies are sent exclusively by our website.

Preferences cookies

These cookies improve and optimize the functioning of our website by offering you personalized features (e.g. language preferences). If these cookies are blocked by the browser, you can no longer enjoy the customized features. These cookies are sent by our website and by third parties.

Analytics cookies

These cookies allow us to create usage statistics of our website. This information helps us to improve the functionalities of our website.

How to control the use of cookies ?

Google Analytics provides an "opt-out" mechanism that blocks the tracking of its services.

Most web browsers can be configured to warn users of attempts to set cookies or to limit the type of cookie they accept. Please refer to the help section of your browser to find out what options your browser offers.

7. HOW LONG WE KEEP YOUR PERSONAL DATA ?

We commit to keep your personal data only for the period necessary for the purposes set out in this privacy notice.

In determining this period we take into account the following criteria:

- **Legal and regulatory requirements to retain the personal data for a minimum period** such as
 - the requirement to retain invoices including the value-added tax for a period of **10 years**;
 - the requirement to retain the traveller accommodation form containing your personal data for a period of **12 months**.
- **Limitation periods for taking legal action** such as the limitation period of **6 months** for taking legal action against clients who did not pay for hotel services.

8. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

Under the GDPR, you are entitled to:

- obtain details of the personal data we hold about you and how we process it (including a copy of that data) ("**right of access**");
- have your inaccurate personal data rectified or have your incomplete personal data completed ("**right to rectification**")
- ask us to delete your personal data in certain cases (for example, when your personal data is no longer necessary for the purposes for which it was collected, or when, your personal data have been unlawfully processed ("**right to be forgotten**");
- in some circumstances, restrict our processing of your personal data ("**right to restriction of processing**");
- if we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time ("**right to withdraw consent**");
- ask us to stop processing your personal data, and we will do so, if we are relying on our own legitimate interest to process your personal data, except if we can prove compelling legal grounds for the processing ("**right to object**");
- in some circumstances, have personal data relating to you transferred to another company ("**right to data portability**");
- lodge a complaint in relation to processing of your personal data with a local supervisory authority.

In order to exercise any of the above rights, feel free to contact us by:

- e-mail: contact@hotelcravat.lu; or
- telephone: +352 22 19 75; or
- fax (if available) : +352 22 67 11; or
- regular mail: GRAND HOTEL CRAVAT S.à r.l., 29, Boulevard Roosevelt, L - 2450 Luxembourg.