

## Privacy Policy

Genuss Werkstatt AG, Obergass 15, 7414 Fürstenau, Switzerland (registered in the commercial register of the Canton of Graubünden under the number CHE-110.126.614) manages Schloss Schauenstein, Casa Caminada and the OZ and thus is the operator of the websites [www.schauenstein.ch](http://www.schauenstein.ch), [www.casacaminada.com](http://www.casacaminada.com), [www.andreascaminada-shop.com](http://www.andreascaminada-shop.com) and [www.oz-restaurant.com](http://www.oz-restaurant.com) and is therefore responsible for the collection, processing and use of your personal data and the compliance of data processing with the applicable data protection law.

Your trust is important to us, which is why we take the issue of data privacy seriously and ensure a corresponding level of security. Of course, we comply with the legal provisions of the Federal Law on Data Protection (DSG), the Ordinance to the Federal Act on Data Protection (VDSG), the Telecommunications Act (FMG) and any other applicable data privacy provisions in Swiss or EU law, or the EU General Data Protection Regulation (GDPR), where applicable.

So that you are aware which personal data we collect from you and what purposes we use it for, please acknowledge the following information. The address of our data protection officer is: [caminada@andreascaminada.com](mailto:caminada@andreascaminada.com).

Personal data are all items of information that relate to an identified or identifiable natural person. Personal data form the basis for identifying or contacting a data subject. These include for example your name, address, e-mail address, telephone number and the IP address assigned to you by your internet service provider. Information that does not form a basis for identifying you (anonymous data) does not fall in the category of personal data.

## Date Processing In Connection With Our Websites

### a. Accessing Our Websites

When you visit any of our websites, our server temporarily stores every access in a log file. As with every connection to a web server, the following technical data is recorded without any action on your part and stored by us until it is automatically deleted after 24 months at the latest:

- The IP address of the requesting computer,
- The name of the owner of the IP address range (usually your Internet access provider),
- Date and time of access,
- The website from which the access is made (so-called referrer URL), if applicable with the search term used,
- The name and URL of the retrieved file,
- The status code (e.g., error message),
- The operating system of your computer,
- The browser you are using (type, version and language),
- The transmission protocol used (e.g., HTTP/1.1) and, if applicable, your username from a registration/authentication.

This data is collected and processed for the purpose of enabling the use of our websites (establishing a connection), ensuring system security and stability in the long term and enabling the optimization of our websites as well as for internal statistical purposes. This is our legitimate interest in data processing within the meaning of Article 6, para. 1, letter f GDPR.

Furthermore, the IP address is evaluated together with other data in the event of an attack on the network infrastructure or other illegal, abusive or unauthorized use of the websites for the purpose of investigation and defense, and, if appropriate, is used within the framework of legal proceedings to establish identity and initiate civil or criminal proceedings against the users concerned. This is our legitimate interest in data processing within the meaning of Article 6, para. 1, letter f GDPR.

### b. Use Of Contact Form

A contact form is available for you to establish contact with us. We require the following details for this purpose :

- First name and surname,
- Residential address,

- E-Mail address
- Telephone number.

We use these data and an optionally provided telephone number exclusively in order to respond in an optimal and personalised manner to your contact request. The processing of this data is therefore necessary within the meaning of Article 6, para. 1, letter b GDPR to execute pre-contractual measures, or is in our justified interest as per Article 6, para. 1, letter f GDPR.

### **c. SSL Encryption**

In order to ensure the security of your data during transmission, we use the most up-to-date encryption techniques (like SSL for example) based on HTTPS.

### **d. Subscription For Our Newsletter**

If you register for one or more of our newsletters, we need your e-mail address, otherwise we will not be able to send you the newsletter. Further data is optional. However, your e-mail address is mandatory when registering. We process your e-mail address and other data you provide voluntarily (e.g. first name and surname) exclusively in order to personalise the information and offers sent to you and to better tailor them to your interests.

By registering, you give us your consent to process the data provided for the regular dispatch of the newsletter to the address you have provided and for the statistical evaluation of user behaviour and the optimisation of the newsletter. This consent constitutes our legal basis for the processing of your email address within the meaning of Article 6, para. 1, letter a GDPR. We are authorised to commission third parties with the technical processing of advertising measures and are entitled to pass on your data for this purpose (see below on the transfer of data to third parties).

At the end of each newsletter you will find a link that you can use to unsubscribe from the newsletter at any time or you can also do this by sending a message to [caminada@andreascaminada.com](mailto:caminada@andreascaminada.com). When unsubscribing, you can voluntarily inform us of the reason for unsubscribing. After cancellation, your personal data will be deleted. Further processing will only take place in anonymised form to optimise our newsletter.

For the sake of completeness, it is noted that the legal basis for processing for the purpose of sending the newsletter and analysing usage is Art. 6 para. 1 subpara. 1 letter a GDPR. The legal basis for processing for the purpose of verifying consent is Art. 6 para. 1 subpara. 1 letter c in conjunction with Art. 5 para. 2 GDPR, Art. 5 para. 2 GDPR, Art. 7 para. 1 GDPR and Art. 24 para. 1 GDPR as well as Art. 6 para. 1 subpara. 1 letter f GDPR. Legitimate interest in processing on the basis of Art. 6 para. 1 subpara. 1 letter f GDPR is the promotion of sales of our products and services, corresponding advertising and proof of your consent, i.e. defence against legal claims.

### **e. Use Of E-mail Address On The Websites For The Purpose Of Making Contact**

You have the option of contacting us by e-mail. To contact us by e-mail, you must click on the respective e-mail addresses. Clicking on them will automatically establish a connection to your e-mail and a window for sending the e-mail will open. You are responsible for the messages or content that you send to us via the e-mail function. We recommend that you do not send any sensitive information via the e-mail function. To use the e-mail function, you only need to enter your e-mail address. We need your e-mail address and other data you provide voluntarily (e.g., first name and surname, telephone number, etc.) in order to be able to respond to your contact request in the best possible and personalized way. The processing of this data is therefore necessary within the meaning of Article 6, para. 1, letter b GDPR for the implementation of pre-contractual measures or is in our legitimate interest pursuant to Article 6, para. 1, letter f GDPR.

#### **f. Purchasing Products, Services And Vouchers On Our Web Shop**

To make shop purchases on our website, you can order as a guest or open a customer account. When you register for a customer account, we collect the following mandatory data:

- Salutation,
- First name and surname
- Postal address,
- Date of birth,
- Telephone number,
- E-mail address
- Password.

The collection of this data and other data voluntarily provided by you (e.g., company name) is carried out for the purpose of providing you with password-protected direct access to your basic data stored by us. You can view your previous and current bookings or manage or change your personal data.

We only collect and process this data to process your purchases, namely to provide you with the products and services you have purchased and to contact you in the event of any queries or problems. Your data will also be forwarded to the relevant service providers for this purpose.

Please note that we use a technical application from Hypersoft Trading GmbH to process your purchase. Your data will therefore also be forwarded to Hypersoft Trading GmbH, Amtsstrasse 9, 22143 Hamburg, Germany. Further information on data transfer and data processing by third parties can be found on the Hypersoft Trading GmbH website. The legal basis for data processing for this purpose is the fulfilment of a contract in accordance with Article 6, para. 1, letter b GDPR.

#### **g. Booking On The Websites, By Correspondance Or By Telephone Call**

If you make bookings either via our websites, by correspondence (email or letter post) or by telephone call, we require the following data to process the contract:

- Form of address
- First name and surname,  
Postal address,
- Date of birth,
- Telephone number,
- Language,
- Credit card information,
- E-mail address.

These data, as well as other optional information you provide (e.g. expected time of arrival, vehicle number plate, preferences, comments), will exclusively be used to process the agreement, unless stated otherwise in this Data Protection Statement or unless you have not provided your express consent. The data will be processed in particular in order to record your booking in accordance with your wishes, to provide the services booked, to contact you in the event of any issues or problems, and to facilitate correct payment.

The legal basis of data processing for this purpose is the performance of an agreement in accordance with Article 6, para. 1, letter b GDPR.

## **h. Applying For A Job Vacancy**

On our website you have the opportunity to apply for a job advertisement or spontaneously. To do so, you must submit a complete application. The following data must be entered in the online form:

- Salutation,
- First and last name,  
Postal address,
- Nationality,
- Date of birth,
- E-mail address,
- Telephone number,
- Professional experience,
- Professional field of interest,
- Letter of motivation, CV, photo and references.

This data is used to handle the application process. Unless you explicitly consent to further processing, the data will be deleted after the respective application process.

The legal basis for data processing is therefore the implementation of pre-contractual measures and our legitimate interest in accordance with Article 6, para. 1, letters b and f GDPR. The legal basis for further data processing is your consent in accordance with Article 6, para. 1, letter a GDPR.

## **i. Cookies**

Cookies help in many ways to make your visit to our website simpler, and more pleasant and rewarding. Cookies are information files that your browser saves automatically on the hard drive of your computer whenever you visit our website.

We use cookies, for example, to temporarily save your selected services and entries when you complete a form on the website, so that you do not have to repeat the entry when accessing a different subpage. Cookies may also be used to identify you as a registered user once you have registered on the website, without you having to log in again when accessing a different subpage.

Most Internet browsers automatically accept cookies. You can, however, configure your browser in such a way that no cookies are saved on your computer, or that a message appears each time you receive a new cookie. The following pages will help you to configure the processing of cookies by the most common browsers:

- Microsoft Windows Internet Explorer,
- Microsoft Windows Internet Explorer Mobile,
- Mozilla Firefox,
- Google Chrome for desktop,
- Google Chrome for Mobile,
- Apple Safari for Desktop,
- Apple Safari for Mobile.

Deactivating cookies may prevent you from being able to use all of the functions of our website.

## **j. Tracking-Tools And Re-Targeting**

### **1. General Information**

We use the web analysis service from Google Analytics in order to ensure the needs-based design and continuous optimisation of our website. In this connection, pseudonymised usage profiles are created and small text files are stored on your computer (cookies). The information generated by the cookie regarding your use of this website is transferred to the servers of the providers of these services, where they are stored and prepared for our use. In addition to the data listed under section 1, we may also receive the following information:

- Navigation path that a visitor follows on the site,
- Time spent on the website or subpage,
- The subpage on which the website is left,
- The country, region or city from which access is made,
- End device (type, version, color depth, resolution, width and height of the browser window) and Returning or new visitor.

The information is used to evaluate usage of the website, to prepare reports on website activity and in order to provide further services related to website usage and Internet usage for the purposes of market research and the needs-based design of this website. This information may also be transferred to third parties if this is required by law, or if the third party concerned is processing these data on our behalf.

### **2. Google Analytics**

This website uses Google Analytics, a web analysis service of the Google company (Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). Google Analytics uses cookies for the purpose. These form the basis for analysis of your use of our site.

The information generated by the cookie about your use of this website will be transmitted to a Google server in the USA and stored there. We use Google Analytics with the extension 'anonymizeIp()', so that the IP addresses transmitted to Google will be abbreviated before further processing takes place, to exclude any direct reference to your personal identity (this is known as 'IP masking'). Google will make use of this information to evaluate your visit to the website, to compile reports about activities on our site and to provide further services associated with website and internet use. Google may also pass on this information to third parties, in so far as this is required by statute or in case the data is to be processed by a third party on Google's behalf. On no account will Google combine your IP address with other data in its possession.

You can prevent the installation of the cookie for Google Analytics by adjusting your browser software accordingly; but we beg to inform you that in this case you may not be able to make use of all the functions of our website to the full extent. You can prevent the collection and storage of data for Google Analytics at any time, with effect for the future, by using Google's opt-out browser plug-in (<https://tools.google.com/dlpage/gaoptout?hl=de>). Please be aware that you will have to opt out more than once if you make a practice of deleting the cookies on your browser, or if you access our website with a different browser. Further information about Google Analytics may be found here :

[https://marketingplatform.google.com/intl/en\\_uk/about/](https://marketingplatform.google.com/intl/en_uk/about/)

Further information regarding the web analysis service used can be found on the Google Analytics website. Instructions on how to prevent your data from being processed by the web analysis service can be found at :

<https://tools.google.com/dlpage/gaoptout?hl=en-GB>

### **3. Google Tag Manager**

Google Tag Manager is another Google product, which makes it possible for us to manage website tags by way of an interface. The Tag Manager is a cookie-free domain, and does not register any personal data. The tool serves for the activation of other tags, which in their turn may then register data in certain circumstances. Google Tag

Manager does not access these data itself. If a deactivation is carried out at domain or cookie level, this remains in force for all tracking tags that have been implemented by Google Tag Manager. If you would rather not be sent advertising based on your interests, you can disable the use of cookies by Google for these purposes by going to <https://support.google.com/ads/answer/7395996?hl=en-GB>.

#### 4. Google AdWords und Remarketing

This website uses Google AdWords, an analysis service from Google, and in this connection also relies on Conversion Tracking. Google AdWords places a cookie ('conversion cookie') on your computer's hard disk for the purpose of conversion tracking, whenever you click on an ad displayed by Google. These cookies lose their validity after 30 days, and do not identify you personally. If you visit certain pages on our website, we and Google can detect that you have clicked on the ad and have been redirected to this page. The information obtained by means of the conversion cookies serves to generate statistics for AdWords customers who use conversion tracking. We learn from the statistics the total number of users who have clicked on the ad shown by Google, and so visited a page provided with a conversion tracking tag. We do not however have any information that would make it possible for us to identify the user personally. The data we obtain cannot be assigned to specific users.

In addition to conversion tracking, we also use the following functions:

- Remarketing,
- Target groups with common interests,
- User-defined target groups with common interests,
- Target groups wishing to make a purchase
- Similar target groups,
- Demographic and geographical focus.

Google's Remarketing function makes it possible for us to reach users who have already visited our website. So, we can present our advertising to target groups that have already shown an interest in our products or services. AdWords also determines, in the light of user behaviour over the last few days on websites forming part of Google's advertising network (the 'Google Display Network'), and with the help of the context-related search engine, what common interests and features are evidenced by users of our website. On the basis of this information AdWords can then find new potential customers for marketing purposes, whose interests and characteristics resemble those of the users of our site. Target-group-specific remarketing is based on the combined use of cookies, including for example Google Analytics cookies and Google DoubleClick cookies.

Further information about the terms and conditions of use and data protection in connection with Google AdWords may be found by following this link: <http://www.google.de/policies/technologies/ads/>.

#### 5. Google Double Click

We use Google's DoubleClick function on our websites to analyse the use of the website and to enable Google and other advertisers who work with DoubleClick to present you with user-relevant advertising. A cookie is installed on your computer's hard drive for this purpose. This cookie is used to assign a pseudonymous identification number to your browser and to collect information about the adverts displayed in your browser and how they are accessed. The information collected by the cookie about your use of websites is usually transferred to a Google server in the USA and stored there. Based on the information collected, interest-relevant categories are assigned to your browser. These categories are used to display interest-based advertising.

In addition to changing your browser settings, you can also use a browser plug-in to permanently deactivate the DoubleClick cookie. With the plug-in, your deactivation settings for this browser are retained, even if you delete all cookies. You can obtain the browser plug-in for permanent deactivation here:

<https://support.google.com/ads/answer/7395996>

By using our website, you consent to the use of the DoubleClick cookie and thus to the collection, storage and use of your usage data in the manner described above for the aforementioned purpose. You also consent to your data being stored in cookies beyond the end of the browser session and, for example, being retrieved the next time you visit the website. You can revoke this consent at any time with effect for the future by deleting the DoubleClick cookie and permanently deactivating it.

## **6. Google Optimize**

Google Optimize is a testing tool that we use to optimize our website. Google Optimize analyzes the performance of different variants of our website and helps us to improve the user experience according to the behavior of the users on our website. Google Optimize is a tool integrated with Google Analytics.

## **7. Monotype Web Fonts**

To display fonts on our website, we use fonts provided by swisstypefaces.com, tighttype.com, colophon-foundary.org and fonts.com. By using web fonts, an external server outside the EU (e.g. in the USA) may be called up when using this offer. We would like to point out that each provider has its own data protection guidelines, which are independent of ours. Please inform yourself about the data protection regulations. Web Fonts is based on Java Script code, so you can prevent it from running altogether by deactivating Java Script in your browser settings or installing a Java Script blocker. Please note that our website may then not be displayed correctly.

## **8. Social Media Functionalities**

We use social media functionalities on our website, in particular the sharing of information on social networks. The functionality is available for the following social networks:

- Meta Platforms, Inc. 471 Emerson St Palo Alto, CA, 943301-1605 USA, or if you are located in the EU Meta Platforms Ireland, Merrion Road Dublin, D04 X2K5 Ireland,
- Google+ from Google Inc, Amphitheatre Parkway, Mountain View, CA 94043, USA,
- Interest by Pinterest Inc, 651 Brannan Street, San Francisco, CA 94103, USA, or if you are resident in the EU, Palmerston House, 2nd Floor, Fenian Street, Dublin 2, Ireland,
- LinkedIn from LinkedIn Corp, 2029 Stierlin Ct, Mountain View, CA 94043, USA, or if you are based in the EU, LinkedIn Ireland Un-limited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland, Xing by New Work SE, Dammtorstrasse 30, 20354 Hamburg, Germany.

If you click on the social network icons, you will be linked to the relevant social network in order to use the selected functionality, e.g., to share content on Facebook. To do this, however, you must log in to your corresponding user account or already be logged in.

If you click on the social network icons, you will be automatically redirected to our profiles on the relevant networks. In order to use the functions of the network there, you must log into your user account in some cases. This provides the network with the information that you are visiting our website with your IP address and have accessed the link. If you access a link to a network while you are logged into your account with the network in question, the content of our site may be linked to your profile on the network, which means that the network can associate your visit to our website directly with your user account. If you wish to prevent this, you should log out before clicking on the corresponding links. An assignment will take place in any case if you log in to the relevant network after clicking on the link.

Further information on the use of the data and your options and rights to protect your privacy appropriately can be found in the respective data protection declarations of the providers.

## **1.0 Data Processing In Connection With Your Stay**

### **a. Data Processing In Order To Meet Legal Reporting Obligations**

On your arrival at our hotel, we will require the following details from you and your companion, if applicable:

- First name and surname
- Postal address and canton
- Date of birth
- Place of birth
- Nationality
- Official identification card and number
- Arrival and departure day
- Room number

We record these data in order to meet the legal reporting obligations based in particular on hospitality law and police law. Insofar as we are obliged to do so in accordance with the applicable provisions, we pass on this information to the competent police authorities.

Compliance with these legal requirements constitutes our legitimate interest within the meaning of Article 6, para. 1, letter f GDPR.

## **b. Data Processing For The Fulfilment Of The Booked Services In General**

During your stay, we may process and collect the following information from you and your travelling companions:

- First name and surname,
- Postal address and canton,
- Nationality,
- Official identification card and number,
- Date of arrival and departure,
- Room number,
- Preferences and habits.

We collect this information not only to fulfil our contractual and post-contractual obligations towards you, but also to be able to offer you the best possible service. The legal basis for this data processing is therefore the fulfilment of the contract within the meaning of Article 6, para. 1, letter b GDPR.

## **c. Recording Of Purchased Services**

If you purchase additional services during your stay (e.g. make use of the minibar or the pay TV offer), we will record the subject matter of the service and the time of purchase for billing purposes. The processing of this data is necessary within the meaning of Article 6, para. 1, letter b GDPR for the fulfilment of the contract with us.

## **d. Storage And Exchange Of Data With Third Parties**

### **1. Booking Platforms**

When you make bookings via a third-party platform, we receive various items of personal data from the platform operator concerned. As a rule, this information comprises data referred to in section 5 of this Data Protection Statement. Furthermore, any queries regarding your booking will be passed on to us. The data will be processed in particular in order to record your booking in accordance with your wishes, and to provide the services booked. The legal basis of data processing for this purpose is the performance of an agreement in accordance with Article 6, para. 1, letter b GDPR.

Moreover, we are informed by the platform operators of any possible disputes arising in connection with a booking. In this context, we may also receive data regarding the booking process, with a copy of the booking confirmation serving as proof of the actual completion of a booking. We process these data with a view to enforcing our rights. This is our legitimate interest within the meaning of Article 6, para. 1, letter f GDPR. Please also refer to the data protection notice of the operator concerned.

### **2. Centralised Storage And Linking Of Data**

We store the data in a centralized electronic data processing system. The data relating to you is systematically recorded and linked in order to process your bookings and fulfil the contractual services. In addition, the data is processed in the system for advertising purposes, in particular to be able to offer you personalized services and products. The legal basis for data processing in the context of customer management is the fulfilment of the contract within the meaning of Article 6, para. 1, letter b GDPR. With regard to data processing in the context of advertising activities, the legal basis is also the performance of the contract (the existing customer relationship justifies data processing for the purpose of advertising activities) and your consent within the meaning of Article 6, para. 1, letter a GDPR, which you give when registering for the newsletter (see section 3).

### **3. Storage Period**

We only store personal data for as long as is necessary to use the above-mentioned tracking services and other processing within the scope of our legitimate interest. We store contractual data for longer, as this is required by



statutory retention obligations. Retention obligations that oblige us to retain data result from regulations on reporting law, accounting and tax law. According to these regulations, business communications, concluded contracts and accounting documents must be stored for up to 10 years. If we no longer need this data to perform the services for you, the data will be blocked. This means that the data may then only be used for accounting and tax purposes.

#### **4. Disclosure Of Data To Third Parties**

We only pass on your personal data if you have expressly consented to this, if there is a legal obligation to do so or if this is necessary to enforce our rights, in particular to enforce claims arising from the contractual relationship. In addition, we pass on your data to third parties insofar as this is necessary for the use of the website and contract processing (including outside the website), in particular the processing of your bookings.

A service provider to whom the personal data collected via the website is passed on or who has or can have access to it is our web host Squarespace. The data is passed on for the purpose of providing and maintaining the functionalities of our website. This is our legitimate interest within the meaning of Article 6, para. 1, letter f GDPR. Finally, we forward your credit card information to your credit card issuer and the credit card acquirer when you pay by credit card on the website. If you decide to pay by credit card, you will be asked to enter all mandatory information. The legal basis for passing on the data is the fulfilment of a contract in accordance with Article 6, para. 1, letter b GDPR. With regard to the processing of your credit card information by these third parties, we ask you as well to also read the General Terms and Conditions and the privacy policy of your credit card issuer.

#### **5. Transfer Of Personal Data Abroad**

We are authorized to transfer your personal data to third-party companies (contracted service providers) abroad for the purposes of the data processing described in this privacy policy. These companies are obliged to protect data to the same extent as we are. If the level of data protection in a country does not correspond to that in Switzerland or the EU, we contractually ensure that the protection of your personal data corresponds to that in Switzerland or the EU at all times.

## **2.0 Further Information**

### **a. Right Of Access, Rectification, Erasure And Restriction Of Processing, Rights To Data Portability**

You have the right to request information about the personal data that we store about you. In addition, you have the right to have incorrect data corrected and the right to have your personal data deleted, provided that this does not conflict with any legal obligation to retain data or any authorisation that allows us to process the data.

You also have the right to request that we return the data that you have provided to us (right to data portability). On request, we will also pass the data on to a third party of your choice. You have the right to receive the data in a commonly used file format.

You can contact us for the aforementioned purposes via the e-mail address [caminada@andreascaminada.com](mailto:caminada@andreascaminada.com). We may, at our discretion, request proof of identity in order to process your requests.

### **b. Children**

We do not knowingly collect personal data from children under the age of thirteen. Children under the age of thirteen are requested not to provide any personal data. We encourage parents and guardians to monitor their children's use of the Internet and to help us enforce our Privacy Policy by instructing their children never to disclose personal information through the Services without their permission. If you have reason to believe that a child under the age of thirteen has provided us with personal information through the Services, please notify us of the incident. We will delete the data from our databases.

### **c. Data Security**

We use suitable technical and organisational security measures to protect your personal data stored by us against manipulation, partial or complete loss and against unauthorised access by third parties. Our security measures are continuously improved in line with technological developments.

You should always treat your access data confidentially and close the browser window when you have finished communicating with us, especially if you share your computer with others.

We also take data protection within the company very seriously. Our employees and the service companies commissioned by us have been obliged by us to maintain confidentiality and to comply with data protection regulations.

### **d. Further Links**

This privacy policy applies only to our website. The website may contain links to external websites to which this statement does not apply. If you leave our website via a link, we recommend that you read the data protection information of each website carefully.

### **e. Note On Data Transfers Abroad**

For the sake of completeness, we would like to point out to users residing or domiciled in Switzerland that there are surveillance measures in place in the USA by US authorities that generally allow the storage of all personal data of all persons whose data has been transferred from Switzerland to the USA. This is done without differentiation, restriction or exception on the basis of the objective pursued and without an objective criterion that makes it possible to restrict the US authorities' access to the data and its subsequent use to very specific, strictly limited purposes that justify the interference associated with both access to this data and its use. We would also like to point out that there are no legal remedies available in the USA for data subjects from Switzerland that would allow them to gain access to the data concerning them and to obtain its correction or deletion, or that there is no effective legal protection against general access rights of US authorities. We explicitly draw the attention of the data subject to this legal and factual situation so that they can make an appropriately informed decision to consent to the use of their data.

We would like to point out to users residing in a member state of the EU that the USA does not have an adequate level of data protection from the perspective of the European Union - partly due to the issues mentioned in this section. Insofar as we have explained in this privacy policy that recipients of data (such as Google) are based in the USA, we will ensure that your data is protected at an appropriate level by our partners either through contractual arrangements with these companies or by ensuring that these companies are certified under the EU or Swiss-US Privacy Shield.

We are also authorised to transfer your personal data to third-party companies (contracted service providers) abroad for the purposes of the data processing described in this privacy policy. These companies are obliged to protect data to the same extent as we are. If the level of data protection in a country does not correspond to that in Switzerland or the EU, we contractually ensure that the protection of your personal data corresponds to that in Switzerland or the EU at all times.

### **f. Change To Our Privacy Policy**

We reserve the right to amend this privacy policy from time to time so that it always complies with current legal requirements or to implement changes to our services in the privacy policy, e.g. when introducing new services. The new privacy policy will then apply to your next visit.

### **g. Right To Lodge A Complaint With A Data Protection Supervisory Authority**

You have the right to lodge a complaint with a data protection supervisory authority at any time.

## **h. Usage Of Our Wifi Network**

You can use the WiFi network operated by Swisscom AG (3050 Bern) free of charge in our various establishments. Prior registration is required to prevent misuse and to take action against unlawful behaviour. In doing so, you transmit the following data to Swisscom AG:

- b. Mobile phone number
- c. MAC address of the end device (automatic)

In addition to the above data, every time you use the WiFi network, data on the hotel visited, including the time, date and end device, is recorded. The legal basis for this processing is your consent within the meaning of Art. 6 para. 1 lit. a EU GDPR. The customer can revoke their registration at any time by notifying us.

Swisscom Ltd must comply with the legal obligations of the Federal Act on the Surveillance of Postal and Telecommunications Traffic (BÜPF) and the associated ordinance. If the legal requirements are met, the WiFi operator must monitor the use of the Internet and data traffic on behalf of the competent authority. The WiFi operator may also be obliged to disclose the customer's contact, usage and marginal data to the authorised authorities. The contact, usage and peripheral data will be stored for 6 months and then deleted.

The legal basis for this processing is our legitimate interest within the meaning of Article 6, para. 1, letter f GDPR in the provision of a WiFi network in compliance with the applicable legal regulations

## **i. Video Surveillance**

To prevent misuse and to take action against unlawful behavior (in particular theft and damage to property), certain areas of our facilities are monitored by cameras. The image data is only viewed if there is suspicion of unlawful behavior. Otherwise, the images are automatically deleted after 72 hours.

For the provision of the video surveillance system, we use a service provider who may have access to the data if this is necessary for the provision of the system. If the suspicion of unlawful behavior is substantiated, the data may then be passed on to the extent necessary for the enforcement of claims or the filing of reports to consulting firms (in particular our law firm) and authorities.

The legal basis is our legitimate interest within the meaning of Article 6, para. 1, letter f GDPR in the protection of our property and the protection and enforcement of our rights