



Privacy and Data Protection Policy
(For the website)

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1 Introduction

MUSKITA TOURIST ENTERPRISES LTD and **ALDIANA ZYPERN HOTEL** Management (also referred to as "we", "our"), attaches great importance to the protection of your personal data and privacy when collecting and processing your personal data information. We assure you that this Privacy and Privacy Policy ("Policy") fully respects and complies with the European Privacy Regulation EU 679/2016 ("Regulation") and the relevant Law 125/I/2018 of the Republic of Cyprus.

2 Definitions

- **Personal data** is any information relating to a natural person through which it can be directly or indirectly identified.
- **Personal data breach:** a breach of security, leading to accidental or unlawful destruction, loss, change, disclosure or disclosure, unauthorized access and similar actions.
- **Controller:** the natural or legal person, who determines the purposes and manner or means of processing personal data.
- **Processor:** the natural or legal person, the public authority, the service or another body, which processes personal data on behalf of the Controller.
- **Processing of personal data: any act or series of acts related to** personal data, such as collection, registration, organization, arrangement, storage, adaptation, change, recovery, search for information, use, disclosure, dissemination or any other form of disposal, correlation, combination, restriction, deletion, destruction.
- **Third party:** any natural or legal person, with the exception of the data subject, the Controller, the Processor and persons who, under the direct supervision of the Controller or processor, are authorised to process the personal data.

3 Who Is the Controller?

The controller of personal data is the legal entity **MUSKITA TOURIST ENTERPRISES LTD.**

Contact Address: Georgiou Mouskis Avenue, P.7572, Alaminos, Larnaca, Cyprus

Telephone: +35724849000 Fax: +357 24849200 E-mail: secretary.zypern@aldiana.com

4 Principles that we adhere to

We commit to comply with the following principles of processing of Personal Data, in accordance with Article 5 of the Regulation:

- Legality, objectivity and transparency - Personal data are subject to a lawful and fair processing, in a transparent manner.
- Limitation of purpose - Personal data shall be collected for specified, explicit and legitimate purposes and shall not be further processed in a manner incompatible with those purposes.
- Data minimization - Personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accuracy & data quality - Personal data is accurate and updated as soon as the company becomes aware.
- Limitation of the storage period - Personal data is kept no longer than necessary, or than required by law.
- Integrity and confidentiality - The company shall take appropriate technical and organizational measures and shall ensure to the extent of reasonable that your data is secure by implementing protection against unauthorized or illegal processing, accidental destruction, or other type of damage.
- Accountability Authority – The company can demonstrate compliance with the above Principles.

5 From whom we collect Personal Data (Data subjects)

We collect Personal Data as Controller from:

- Individuals or parties interested in the services we offer, the visitors of our facilities, the users of **our website** and the accounts we keep on social media, our Wi-Fi users.
- The recipients of our hotel and other related services, or events organized in our facilities.
- Third parties involved in events related to the provision of our services.
- Those who complete some of our documents in paper or electronic form.
- Our suppliers or partners who are natural persons or/ or natural persons in their capacity as employees, directors or partners to a legal person supplier or partner or interested parties to cooperate with us.
- Our hotel employees and those who wish to work for us in the future.

It is noted that we process personal data, which third parties usually disclose to us when we act as Processors processing on their behalf.

6 What Personal Data Can Collect

We may collect and process, where appropriate, various personal data, to serve the purpose for which we collect it and according to their legal collection basis, which we have grouped into the following categories:

Identity data: This category includes data such as name, id or passport number, nationality, citizenship, gender, age or date of birth, username or similar identifier.

Contact data such as, phone, fax, address, e-mail.

Special category data if you disclose it to us, such as health data, nutritional issues, allergies, anniverses, specific requirements and data related to requests you make.

Professional status data, or/or cv data, studies and experience, if you notify us of it in any way.

Transaction and booking data, such as account number, credit card number, tax identification number, payment reason, payment terms and reservations.

Evaluation data when you fill out questionnaires, or comment on various media, including social networks.

Skill data when you want to participate in activities that require similar evaluation, such as age, weight, sports skills, minor problems for attention, certificate assessment

Investigative data of any accidents, such as incident data, involved, or related photographs.

Data for your children if you use similar services, such as child name, birthday, language knowledge, special categories & behavior data.

Technical (or online) Data such as IP or MAC address (Internet Protocol Media Access Control), device or browser name or type and data collected from cookies that are listed below.

Your image with your consent may be posted online, including social media.

It is noted that for our employees, other personal data are received, for which they are updated through documents, manuals with policies and procedures and information that is done internally to the company.

7 Legal Basis and Purpose of processing

The processing of personal data is based on one or more of the "legal basis", as referred to in Article 6 of the Regulation (or Article 9 for specific categories of data). Legal basis on which the collection and processing of personal data is based is mainly consent, compliance with legal commitments for the performance of our contractual obligations, compliance with our legal obligations, the safeguarding of our legitimate interests or interests of a third party and the safeguarding your vital interests or a third party. For specific categories of personal data processing is based on the consent or performance of obligations and the exercise of specific rights of the controller or data subject in the field of labour law and social security and social protection law, or processing necessary for assessing the ability to work of the worker (by or under the responsibility of a professional subject to the obligation to respect professional secrecy). The basis for the processing of your personal data is associated as follows with each processing purpose, with unique correlation or combination.

Consent: When you contact us, either as interested in our services, or as interested parties for work or cooperation, or when you fill in some of our forms, or when you wish to conduct events or activities on our premises, or when you visit our social media accounts, or when you log on to our wireless network.

To perform our contractual obligations: When you have agreed to accept some or all of our services offered, when you are our employee, partner or supplier to sign and comply with contractual terms, or where we contact you based on services contracts.

Our legal obligations are fulfilled: to comply with our legal obligations with all kinds of principles such as police, labour law, regulatory, tax, accounting, statutory auditors, judicial authorities and services or in conjunction with the execution of our contractual obligations or the payment of our obligations.

Ensuring our legitimate interests: to improve our services, to investigate any accidents, to pay us, to train our staff, for facial and situation assessments.

Adherence to vital interests: in the event of an accident, a medical or other emergency, to protect your own vital interests or another person, when you or the other person are unable to give your consent.

The legal basis for the processing of certain personal data of our staff is, for the performance of obligations and the exercise of specific rights of the controller or data subject in the field of labour law and social security and social protection law and/or processing necessary for the assessment of the worker's ability to work.

It should be noted that in cases where we collect personal data to comply with our statutory obligations or in accordance with the terms of a contract and you do not want or cannot provide this data when requested, we may not be able to respond to your wishes or obligations (for example, provide you with hotel or other types of services).

8 For how long the data is kept

We adhere to personal data for as long as necessary by the corresponding processing purpose and any other permitted linked purpose.

Usually the data we process is based on your consent and is kept from the time we receive the relevant consent and until it is revoked or in many cases when there is no reason to maintain it.

Data collected based on contractual and legal obligations shall be retained after the expiry of the contractual and legal obligations, as provided for in the respective institutional framework.

For cookies in most cases the browser you use to visit websites can be configured to handle cookies according to your preferences.

Data collected or may be needed for our legitimate interests as Controller shall be kept until the reason for compliance with them ceases.

The resumes/Curriculum Vitae we receive from interested parties are kept for 12 months or until the end of the following year.

Information that is no longer necessary is safely destroyed. We restrict access to your data by employees on a need-to-know basis.

9 Personal data of Minors

When collecting information directly from you, we receive appropriate care to verify which of the collected personal information relates to minors. We usually collect only the necessary personal data of minors or what you disclose to us alone with verifiable parental consent. In any case, if we find that we have collected any personal information from a minor without verifiable parental consent, which can only happen in online cases, we will delete the information as soon as possible. If you believe that we may have collected information from a minor, please let us know at the contact address listed below.

10 How to ensure the Security of Personal Data

We have received reasonable organizational and technical means to protect the information we collect, and, any specific categories of personal data. We are in line with international standards and practices to ensure the security of our networks. It is obvious that certain measures cannot be publicly announced for obvious reasons. For example, the following security measures shall be taken in order to protect personal data against improper use, or any other form of unauthorized processing:

- Our facilities are safe, taking several and reasonable steps to the extent possible.
- Access to personal data is limited only to a certain number of authorised persons, for the purposes concerned and the necessary data transfer shall be carried out in safe procedures.
- Our staff is bound by confidentiality rules, with classified and limited access, only to the necessary data.
- Special categories of data are stored in ways where only authorized access exists.
- We select reliable partners, who are bound in writing in accordance with Rule 28 of the Rules of Procedure, with the same obligations as regards the protection of personal data. We reserve the right of review to them, in accordance with the abovementioned article.
- In IT and communication systems, appropriate technical measures shall be taken to prevent unauthorised access or other processing and availability. Access to these systems is monitored on a regular basis in order to detect and prevent illegal use at an early stage.

11 To whom the Data may be disclosed to

At **ALDIANA ZYPERN HOTEL** we take all the provisions so that the recipients of the personal data are the minimum possible.

In specific personal data from what we legally collect, they may be accessed or disclosed, as appropriate:

- Any competent supervisory authority, within its supervisory role.
- Any public or judicial authority, if required by law or by a court order.
- The auditor of the company, for any data required (financial data, staff, contracts and other controls), under confidentiality.
- The legal adviser, for any data required in legal cases, under confidentiality.

- The partner banks (company, staff or partners and suppliers) only for data relating to payment issues.
 - Training consultants, trainer and HRDA for training issues and only for the necessary information and data departments.
 - Our information resource managers based on appropriate non-disclosure and confidentiality contracts.
- The personal data we collect is not transmitted to third countries or international organizations.

12 Where the processing takes place

The personal data we collect is processed within the European Economic Area (EEA).

13 Your rights as a Data Subject and how you can exercise them

You have the right to information, the right to consent when it is based on the receipt of personal data, the right to request access to your personal data, right of rectification, right to delete your personal data if it can be done as stated below, right to restrict processing, right to object to processing specifically for direct marketing purposes, and/or exercise your right to data portability. We inform you that we do not perform processes based on automated decision-making, including profile training.

Your right to information is exercised under this publicly disclosed policy.

If the processing of personal data is based on your consent, you can revoke it at any time. Any processing carried out until consent is withdrawn shall be perfectly legal if it has been done for the specific purposes declared.

In more detail, you have the right to:

- Access:** You have the right to know what data we have for you, for our processing of data, as well as you have the right to access that data that concerns you, provided that no rights of a third party are adversely affected.
- Correction:** You have the right to request a correction or completion of your data if they are inaccurate or incomplete. Please, since we are not able to monitor changes on your personal data without you informing us, whenever there is a notable change please inform us, so that we have accurate and up-to-date information.
- Delete:** You have the right to request the deletion of your data.
 - The data is no longer necessary for the purposes for which they were collected.
 - If there is no legal basis for processing, other than consent.
 - If you exercise the right to oppose (see this right below).
 - If the data were processed contrary to the laws in force.
 - If the data must be deleted in order to comply with a legal obligation.

We reserve the right to refuse to satisfy the above right if the processing of the data is necessary to comply with our legal obligation, for reasons of public interest, or to establish, exercise or support our legal claims (Article 17 §3).

d. **Restricting process:** You have the right to flag the data in order to limit their processing.

e. **Portability:** You have the right to receive your data to a structured, commonly used or readable by form machines, as well as to request their transmission, both to you and to another natural or legal person who will process it.

f. **Opposition:** You have the right to object at any time to your data processing, including profile training, as well as when the reason for processing is for direct marketing.

At **ALDIANA ZYPERN HOTEL**, in the event that you make any request for your rights, in writing, we will review your request and reply to you within one month of receipt, either for its satisfaction, or to inform you of the objective reasons which prevent its satisfaction. In cases of complexity of your request or if we have received a large number of requests from you and/or others, we will contact you and may request an additional two months as permitted by Article 12 (3) of the Rules of Procedure.

The exercise of your above rights shall be carried out at no cost to you, by sending an application, or letter, or email, or in any other way of notifying the Data Protection Officer mentioned below.

If you are not satisfied with our use of your data, or by our response to the exercise of your above rights, you are entitled to lodge a complaint with the Privacy Authority. You can, of course, contact the Data Protection Officer for any information during office hours so that you are satisfied with your legitimate processing of personal data.

You can exercise your above rights in the contact details set out below.

14 Personal Data Breach

In the event of a breach of the security and integrity of personal data at our disposal and if we are the Controller, we will take the following measures (in accordance with Articles 33 and 34 of the Rules of Procedure):

- We will examine and evaluate those procedures required to limit the breach.

- We will assess its risk and impact on your rights and freedoms.
 - We will try to reduce as much damage as possible or may be caused.
 - We will notify within 72 hours, as soon as we are aware of the breach, the Privacy Authority, if necessary.
 - We will assess the impact on your privacy and take appropriate measures to prevent a repeat of the breach.
- In the event of a data breach for which we are Processors, we will immediately notify the Controller.

15 Links to Other Websites

Our Website may contain links to other websites that do not work or be controlled by us. If you click a third-party link, you will head to the third party's website. We recommend that you check the Privacy Policy for each website you visit. We have no control and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

16 Contact Details of the Privacy Authority

Cyprus Personal Data Protection Authority

Iasonos 1, 1082 Nicosia Phone: +35722818456 E-mail: commissioner@dataprotection.gov.cy

Additional details and terminology for the Regulation can be found on the website

<https://eur-lex.europa.eu/legal-content/EL/TXT/?uri=celex%3A32016R0679>

17 Contact details with the company for Personal Data Issues

For any issue regarding the processing of your personal data and for the exercise of your above-mentioned rights, you can contact our hotel Privacy Officer at +35725832000, fax +357 24849200, or e-mail: dpo.zypern@aldiana.com

18 Cookies

To inform you about our cookie policy, please click here or visit the appropriate place on our website [[add hyperlink](#)].

19 Policy Update

This policy is in force from 25 May 2018 and is revised when there is a significant change. This review will be available on our website, with a note of the date of entry into force. A printed form of this policy can be found in our offices or can be sent to you upon your request.