

# Privacy Policy for Hotel Arlette AG, 8001 Zurich, Switzerland

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## **1. Data protection officer for and content of this Privacy Policy**

We, Hotel Arlette AG (**Hotel**), Stampfenbachstrasse 26, 8001 Zurich, Switzerland, are the operator of the hotel and the website [www.hotelarlette.ch](http://www.hotelarlette.ch) and, unless otherwise stated in this Privacy Policy, are responsible for the data processing described in this Privacy Policy.

So that you know what type of personal data we collect from you and what purposes we use it for, please note the information below. When it comes to data protection, we are primarily guided by the legal requirements of Swiss data protection law, in particular the Federal Act on Data Protection (**FADP**) and the GDPR, the provisions of which may be applicable in individual cases.

Please note that the following information is reviewed and amended from time to time. We therefore recommend that you read this Privacy Policy on a regular basis. Furthermore, other companies are responsible under data protection law or jointly responsible with us for individual data processing operations listed below, so that the information from these providers is also decisive in these cases.

## **2. Contact for data protection**

If you have any questions about data protection or would like to exercise your rights, please contact us by letter at:

Hotel Arlette AG, Data Protection, Stampfenbachstrasse 26, 8001 Zurich, Switzerland

or by email to:

[datenschutz@hotelarlette.ch](mailto:datenschutz@hotelarlette.ch)

## **3. Scope and purpose of the collection, processing and use of personal data**

### **3.1 Data processing when contacting us**

If you get in touch with us via our contact addresses and channels (for example, by email or phone), your personal data will be processed. We process the data that you have provided us with, such as your name, email address or telephone number as well as your request. In addition, the time of receipt of the request is documented. We process this data in order to respond to your request (for example, to provide information about our hotel, support in contract processing such as questions about your booking, incorporation of your feedback into the improvement of our services, etc.).

The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 para. 1 letter f of the GDPR in the implementation of your request or, if your enquiry is directed towards the conclusion or performance of a contract, the necessity for the implementation of the necessary measures within the meaning of Art. 6 para. 1 letter b of the GDPR.

### **3.2 Data processing when registering for a customer account**

If you open a customer account on our website, we collect the following data, where mandatory information is marked with an asterisk (\*) in the corresponding form:

– Personal details:

○ Title

- \* Language
- Nationality
- Gender
- \* Greeting
- \*First name
- \* Surname
- \* Address
- Billing and, if applicable, delivery address
- Company, company address and VAT ID no. for corporate customers
- Email address
- Telephone number
- Password (8 characters, 1 upper case, 1 special character)
- Booking details
- \*Confirmation that the information provided is correct
- \* Confirmation of acknowledgement of and agreement to the GTC and data protection regulations

We use the personal details to determine your identity and to check the requirements for registration. The email address and password are used together as login data and thus to ensure that the correct person is using the website. We also require your email address to verify and confirm account opening and for future communication with you which is required for contract processing. In addition, this data is stored in the customer account for future bookings or conclusions of contracts. For this purpose, we also allow you to store additional information in the account (such as your preferred payment method).

We also use the data to provide an overview of the bookings made and services purchased, and to make it simple to manage your personal details, as well as for the administration of our website and the contractual relationships, in other words, for the creation, content design, processing and amendment of the contracts concluded with you via your customer account (for example, in connection with your booking with us).

We process the information on language and gender in order to display proposed offers tailored to your profile and personal needs on the website, to statistically record and evaluate the offers selected and thus to optimise our suggestions and offers.

The legal basis for processing your data for the above purpose is your consent pursuant to Art. 6 para. 1 letter a of the GDPR. You may revoke your consent at any time by removing the information from your customer account or by deleting your customer account or by sending us a message to have it deleted.

To avoid misuse, you should always treat your login details as confidential and log out after each session, as well as delete your browser history, especially if you share your device with others.

### **3.3 Data processing for bookings**

#### **3.3.1 Booking via our website**

You can book an overnight stay on our website. We collect the following data for this purpose, where mandatory information is marked with an asterisk (\*) during the booking process:

- \* Language
- Nationality
- Gender
- \* Greeting
- \* First name
- \* Surname
- \* Address
- Company, company address and VAT ID no. for corporate customers
- \* Email address
- \* Telephone number
- \* Passwords (8 characters, 1 upper case, 1 special character)
- \* Booking details
- \* Confirmation that the information provided is correct
- \* Confirmation of acknowledgement of and agreement to the GTC and data protection regulations

We use the data to determine your identity before concluding a contract. We need your email address to confirm your booking and for future communication with you required for processing the contract. We store your data together with the peripheral data of the booking (such as room category, period of stay and description, price and features of the services), the payment data (such as selected payment method, confirmation of payment and time; see also 3.4) as well as information on processing and performance of the contract (such as receipt of and handling of complaints), so that we can ensure correct handling of the booking and contract performance.

Insofar as this is necessary for the performance of the contract, we will also pass on the required information to any possible third-party service providers (such as event organisers or transport companies).

The legal basis for this data processing is the performance of a contract with you in accordance with Art. 6 para. 1 letter b of the GDPR.

Data that is not marked as mandatory is provided voluntarily. We process this data in order to tailor our offer to your personal needs as best possible, to facilitate contract processing, to contact you if necessary via an alternative communication channel for the purpose of fulfilling the contract or for statistical collection and evaluation in order to optimise our offers.

The legal basis for this data processing is your consent within the meaning of Art. 6 para. 1 letter a of the GDPR. You may revoke your consent at any time by notifying us.

We use the software application Fidelio Suite8 from the Oracle Corporation for the booking process on our website. Your data may therefore be stored in a database of the Oracle Corporation, which may allow it access to your data if necessary for the purposes of providing the software and for support in using the software. You can find information about the processing of data by third parties and any transfer abroad under section 4 of this Privacy Policy.

The legal basis for this data processing is the performance of a contract with you in accordance with Art. 6 para. 1 letter b of the GDPR.

### **3.3.2 Booking via a booking platform**

If you make bookings via a third-party platform (such as booking.com, expedia.ch, etc.), we receive miscellaneous personal data from the respective platform operator in connection with the booking you have made. As a rule, this is the data listed in section 3.4 of this Privacy Policy. In addition, any enquiries relating to your booking may be forwarded to us. We will process this data specifically for the purpose of recording your booking as requested and to provide the booked services.

The legal basis for this data processing for this purpose is the implementation of pre-contractual measures and the performance of a contract in accordance with Art. 6 para. 1 letter b of the GDPR.

Finally, we may possibly exchange personal data with the platform operators in connection with disputes or complaints concerning a booking, insofar as this is necessary to safeguard our legitimate interests. This may also include data relating to the booking process on the platform or data relating to the booking or processing of services and your stay with us. We process this data to safeguard our legitimate claims and interests in the handling and maintenance of our contractual relationships with the following platform operators:

- booking.com. For more information, see the privacy statement and cookie policy at [www.booking.com](http://www.booking.com)
- expedia.ch. For further information, see the privacy policy at [www.expedia.ch](http://www.expedia.ch)

Your data is stored in the databases of the platform operators, which enables them to access your data. You can find information about the processing of data by third parties and any transfer abroad under section 4 of this Privacy Policy.

The legal basis for processing data for this purpose is our legitimate interest within the meaning of Art. 6 para. 1 letter f of the GDPR.

### **3.4 Data processing during payment processing**

If you purchase products, obtain services or pay for your stay at our hotel using an electronic means of payment, the processing of personal data is required. When you use the payment terminals, you transmit the information stored in your payment method, such as the name of the cardholder and the card number, to the payment service providers involved (such as providers of payment solutions, credit card issuers and credit card acquirers). They also receive the information that the payment method has been used at our hotel, the amount and the time of the transaction. Conversely, we only receive the credit of the amount of the payment made at the respective time, which we can then allocate to the relevant receipt number, or information that the transaction was not possible or was cancelled. Always observe, in addition, the information of the respective company, in particular the privacy policy and the general terms and conditions.

We use the Fidelio Suite8 software application from the Oracle Corporation for payment processing. Your data may therefore be stored in a database of the Oracle Corporation, which may allow it access to your data if necessary for the purposes of providing the software and for support in using the software. You can find information about the processing of data by third parties and any transfer abroad under section 4 of this Privacy Policy.

The legal basis for our data processing is the performance of a contract with you in accordance with Art. 6 para. 1 letter b of the GDPR.

### **3.5 Data processing when recording and invoicing purchased services**

If you obtain services during your stay (for example, additional overnight stays), we will record and process the booking data (such as time and comments) as well as the data on the service booked and used (such as subject of the service, price and time of receipt of the service), in addition to your contract data, in order to process the service, as described in sections 3.3.

The legal basis for our data processing is the performance of a contract in accordance with Art. 6 para. 1 letter b of the GDPR.

### **3.6 Data processing when using our WiFi network**

You can use our WiFi network free of charge in our hotel. Registration in advance is required to prevent misuse and sanction unlawful conduct. You provide us with the following data for this purpose:

Name, Surname, address, nationality, country, date of birth, passport, signature.

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

In addition to the aforementioned data, the time and date of use as well as the end device used are recorded every time you use the WiFi network. The legal basis for this processing is your consent within the meaning of Art. 6 para. 1 letter a of the GDPR. You may revoke your consent at any time for the future.

We work together with UMB AG, Müllerenstrasse 3, 8604 Volketswil, Switzerland, to provide our WiFi network. Your data may therefore be stored in a database which may enable UMB AG to access your data if this is necessary to provide the software and the support in using the soft-

ware. You can find information on the processing of data by third parties in section 4 of this Privacy Policy. You can find further information on data processing by UMB AG at [www.umb.ch](http://www.umb.ch) on their privacy policy page.

UMB AG must comply with the legal obligations of the Federal Act on the Surveillance of Post and Telecommunications (SPTA) and the respective ordinance. If the legal requirements are met, the WiFi network operator must monitor Internet use and data traffic on behalf of the responsible authority. The operator of the WiFi network may also be obliged to disclose contact, usage and peripheral data of the hotel guest to the authorised authorities. The contact, usage and peripheral data will be stored for six months on a personalised basis and then deleted.

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

### **3.7 Data processing in compliance with statutory reporting obligations**

When you arrive at our hotel, we may require the following information from you and the persons accompanying you. Mandatory information is marked with an asterisk (\*) in the relevant form:

- \*Title
- \*First name and surname
- Billing address
- \*Date of birth
- \*Nationality
- \*ID card or passport
- \*Day of arrival and day of departure

We collect this information in order to comply with statutory reporting obligations resulting, in particular, from hospitality or police law. To the extent that we are obliged to do so under the applicable regulations, we forward this information to the responsible authority.

The legal basis for the processing of this data is our legitimate interest in complying with our legal obligations within the meaning of Art. 6 para. 1 letter c of the GDPR.

## **4. Disclosure and transfer of personal data**

### **4.1 Disclosure to third parties and possible access by third parties**

Without the support of other companies, we would not be able to provide our services in the required form. In order for us to use the services of these companies, we also need to disclose your personal data to them to a certain extent. Data is disclosed to selected third-party service providers and only to the extent necessary for optimal provision of our services. Various third-party service providers are explicitly mentioned in this Privacy Policy.

The legal basis for such disclosure is the necessity for the performance of a contract within the meaning of Art. 6 para. 1 letter b of the GDPR.

Your data will also be disclosed insofar as this is necessary to provide the services you have requested, in other words, to restaurants or providers of other services for which you have made a reservation through us. The legal basis for such disclosure is the necessity for the performance of a contract within the meaning of Art. 6 para. 1 letter b of the GDPR. It is the third-party service providers who are responsible for this data processing within the scope of the Data Protection Act, and not us. It is up to these third-party service providers to inform you about their own data processing which goes beyond the disclosure of data for providing services, and to comply with data protection laws.

In addition, your data may be disclosed, in particular to authorities, legal advisors or debt collection agencies, if we are legally obliged to do so or if this is necessary to safeguard our rights, in particular to assert claims arising from our relationship with you. Data may also be disclosed if another company intends to acquire our company or parts thereof and such disclosure is necessary to conduct a due diligence audit or to complete the transaction.

The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 para. 1 letter f of the GDPR in safeguarding our rights and complying with our obligations or in selling our company or parts thereof.

## **4.2 Transfer of personal data abroad**

We are also entitled to transfer your personal data to third parties abroad if this is necessary to carry out the data processing specified in this Privacy Policy. Individual data transfers have been mentioned above in section 3. In the course of this transfer, the legal regulations on the disclosure of personal data to third parties will, of course, be complied with. Countries to which data is transferred include those which, in accordance with the decision of the Federal Council and the EU Commission, have an adequate level of data protection (such as the member states of the EEA as well as, from the point of view of the EU, Switzerland), but also those countries (such as the USA) whose level of data protection is not considered adequate (see Annex 1 of the Data Protection Regulation (DPO) and the [EU Commission website](#)). If the country in question does not have an adequate level of data protection, we will ensure that your data is adequately protected at these companies by means of appropriate safeguards, unless an exception is specified for individual data processing in individual cases (see Art. 49 of the GDPR). Unless otherwise specified, these are standard contractual clauses within the meaning of Art. 46 para. 2 letter c of the GDPR, which can be accessed on the websites of the [FDPIC \(Federal Data Protection and Information Commissioner\)](#) and the [EU Commission](#). If you have any questions regarding the measures taken, please get in touch with the contact person for data protection (see section 2).

## **4.3 Notes on transmitting data to the USA**

Some of the third-party service providers mentioned in this Privacy Policy are based in the USA. In order to be fully transparent, we would like to point out to users with their place of residence or registered office in Switzerland or the EU that there are monitoring measures in place in the USA by the US authorities which generally enable the storage of all personal data of anyone whose data has been transferred from Switzerland or the EU to the USA. This occurs without any distinctions, limitations or exceptions based on the stated objective and without any objective criteria which would make it possible to limit the US authorities' access to the data and later



use thereof to a very specific, strictly limited purpose which would legitimise the intervention associated with accessing said data and the use thereof. In addition, we would like to point out that there are no legal remedies or effective judicial legal protection in the USA for the persons concerned from Switzerland or the EU against general access rights of US authorities that would allow them to obtain access to the data relating to them and to have it corrected or deleted. We explicitly point out this legal situation and these facts so that you can make an appropriately informed decision on whether or not to give your consent for your data to be used in this way.

We would also like to point out to users residing in Switzerland or an EU member state that, from the point of view of the European Union and Switzerland, the USA does not have an adequate level of data protection, due among other things to the issues dealt with 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 adequately protected by our third-party service providers by means of contractual arrangements with these companies as well as any additional appropriate guarantees required.

## **5. Background data processing on our website**

### **5.1 Data processing when you visit our website (log file data)**

When you visit our website, the servers of our hosting provider OptimaNet Schweiz AG (Hostfactory), Stationsstrasse 56, 8472 Seuzach, Switzerland, temporarily store each access in a **log file**. The following data is collected without your involvement and stored by us until it is automatically deleted:

- IP address of the requesting computer;
- date and time of access;
- name and URL of the retrieved file;
- the website from which access took place, possibly with the search term used;
- your computer's operating system and the browser you use (including type, version and language setting);
- type of device if accessed through a mobile phone;
- city or region from which access took place; and
- the name of your Internet access provider.

This data is collected and processed for the purpose of enabling you to use our website (establishing a connection), ensuring system security and stability on a permanent basis, and enabling the error and performance analysis and optimisation of our website (see also section 5.3 regarding the latter points).

In the event of an attack on the network infrastructure of the website or in the event of suspicion of any other unauthorised or improper use of the website, the IP address and other data are evaluated for investigation and defence purposes and may be used to identify the user in question in civil or criminal proceedings.

We have a legitimate interest within the meaning of Art. 6 para. 1 letter f of the GDPR where the purposes described above are concerned and thus the legal basis for data processing.

Finally, when you visit our website, we use cookies as well as applications and tools which are based on the use of cookies. The data described here may also be processed in this context. You can find more information in the following sections of this Privacy Policy, in particular section 5.2 below.

## **5.2 Cookies**

Cookies are information files that your web browser stores on the hard drive or main memory of your computer when you visit our website. Cookies are assigned identification numbers which identify your browser and allow the information contained in the cookie to be read.

Cookies help, for example, to make your visit to our website simpler, more pleasant and more appropriate. We use cookies for various purposes that are necessary for your required use of the website, in other words, that are “technically necessary”. For example, we use cookies to identify you as a registered user after you log in, without you having to log in again each time you navigate to the various subpages. The provisioning of ordering and booking functions is also based on the use of cookies. In addition, cookies also perform other technical functions required for operating the website, such as load balancing, in other words, the distribution of the performance load of the website to different web servers to reduce the load on the servers. Cookies are also used for security purposes, to prevent unauthorised posting of content, for example. Finally, we also use cookies in the design and programming of our website, for example, to enable uploading of scripts or codes.

The legal basis for this data processing is our legitimate interest in providing a user-friendly and contemporary website within the meaning of Art. 6 para. 1 letter f of the GDPR.

Most web browsers accept cookies automatically. However, when you access our website, we ask for your consent to accept those cookies we use which are technically not necessary, in particular when using cookies from third-party providers for marketing purposes. You can configure the settings as you wish using the appropriate buttons in the cookie banner. You can find details of the services and data processing associated with the individual cookies in the cookie banner and in the following sections of this Privacy Policy.

You may also be able to configure your browser such that no cookies are stored on your computer or you are always notified when you receive a new cookie. The pages below explain how you can configure the processing of cookies in selected browsers.

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

Deactivating cookies may mean that you cannot use all the features of our website.

### 5.3 Tracking and web analysis tools

#### 5.3.1 General information on tracking

We use the web analysis services listed below for the purposes of needs-based and continuous optimisation of our website. In this respect, pseudonymised user profiles are created and cookies are used (please also see section 5.2). The information generated by the cookie about your use of this website is usually transmitted together with the log file data listed in section 5.1 to one of the servers of the service provider, where it is stored and processed. This may also mean that data is transferred to servers abroad, for example, the USA (see here in particular sections 4.2 and 4.3 regarding the lack of an appropriate level of data protection and the guarantees provided).

Processing the data provides us with the following information, including:

- the navigation path a visitor takes on the site (including the content viewed and the products or services selected or purchased);
- time spent on the website or subpage;
- the subpage on which the user left the website;
- the country, region or city from which the website is accessed;
- end device (type, version, colour depth, resolution, width and height of the browser window); and
- recurring or new visitors.

The provider will use this information on our behalf to evaluate the use of the website, in particular to compile website activities and to provide other services associated with the use of the website and the Internet for the purposes of market research and needs-based design of these websites. To a certain extent, we and the providers may be regarded as jointly responsible under data protection law for these processing operations.

The legal basis for this data processing with the following services is your consent within the meaning of Art. 6 para. 1 letter a of the GDPR. You can revoke your consent or refuse processing at any time by rejecting or deactivating the relevant cookies in your web browser settings (see section 5.2) or by making use of the service-specific options described below.

For further processing of the data by the respective provider as the party (solely) responsible under data protection law, in particular any possible forwarding of this information to third parties, such as authorities based on national legal regulations, please note the respective privacy policy of the provider.

#### 5.3.2 Google Analytics

We use the web analysis service Google Analytics provided by Google Ireland Limited (Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland) and Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (**Google**).

Contrary to the description in section 5.3.1, IP addresses are not logged or stored in Google Analytics (in the version “Google Analytics 4” used here). Where access from the EU is concerned, IP address data is only used to derive location data and is then deleted immediately. When

measurement data is collected in Google Analytics, all IP searches are carried out on EU-based servers before the traffic is forwarded to analytics servers for processing. Regional data centres are used in Google Analytics. When Google Analytics establishes a connection to the nearest available Google data centre, the measurement data is sent to Analytics via an encrypted https connection. In these centres, the data is further encrypted before being forwarded to Analytics' processing servers and made available on the platform. The IP addresses are used to determine the most suitable local data centre. This may also result in data being transmitted to servers abroad, for example, in the USA (see here in particular section 4.2 regarding the lack of an appropriate level of data protection and the guarantees provided).

We also use the technical extension "Google Signals" here, which enables cross-device tracking. This makes it possible to assign a single website visitor to different end devices. However, this only happens if the visitor has logged into a Google service when visiting the website and has at the same time activated the option "personalised advertising" in their Google account settings. Even then, we do not gain access to any personal data or user profiles; they remain anonymous. If you do not want "Google Signals" to be used, you can deactivate the "personalised advertising" option in your Google account settings.

Users can prevent Google from collecting and processing the data generated by the cookie and relating to the use of the website by the user concerned (including their IP address) by downloading and installing the browser plug-in available at the following link:

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

As an alternative to the browser plug-in, users can click on this link to prevent Google Analytics from collecting data on the website in the future. An opt-out cookie is then placed on the user's device. If users delete cookies (see section 5 Cookies), they need to click the link again.

### 5.3.3 Google Maps

**On our website, we use Google Maps (API) of Google LLC, Mountain View, California/USA (www.google.com); Google Limited Ireland ("Google") is responsible for Europe. Google Maps is a web service that provides interactive (country) maps to visually present geographical information. By using this service, you can see our location and possible ways to get there. When you call up those subpages which are embedded in the map of Google Maps, information on your use of our website (such as your IP address) is transferred to the servers of Google in the US and stored there. This happens regardless of whether a user account is provided by Google. If you are logged into Google, your data is linked to your account directly. If you do not wish for data to be linked to your Google profile, you must log out before activating the button. Google saves your data (even for users who are not logged in) as a use profile and analyses these. For data transferred to the US, Google has undertaken to sign and comply with the standard EU contractual clauses.**

### 5.3.4 Google Fonts

We use fonts ("Google Fonts") of the provider Google LLC, Mountain View, CA 94043/USA (privacy policy: <https://www.google.com/privacy>).

## 5.4 Social media plug-ins

## 5.5 Online advertising and targeting

### 5.5.1 In general

We use the services of various companies to provide you with interesting offers online. This involves analysing your user behaviour on our website and the websites of other providers in order to be able to show you online advertising that is individually tailored to you.

Most technologies for tracking your user behaviour (**tracking**) and the targeted display of advertising (**targeting**) work with cookies (see also section 5.2), which enable your browser to be recognised via various websites. Depending on the service provider, it may also be possible that you are recognised online even when you use different end devices (such as a laptop and smartphone). For example, this may be the case if you have registered for a service that you use on multiple devices.

In addition to the data already mentioned which is accrued when you access websites (**log file data**, see section 5.1) and when cookies are used (section 5.2) and which may reach the companies involved in the advertising networks, the following data is used to select the advertising that is potentially most relevant to you:

- information about yourself which you provided when registering or using an advertising partner service (such as your gender, age group); and
- user behaviour (such as search queries, interactions with advertising, types of websites visited, products or services viewed and purchased, subscribed newsletters).

We and our service providers use this data to determine whether you belong to the target group we are addressing and take this into account when selecting advertisements. For example, after you have visited our site, you may be shown displays of the products or services you consulted when you access other sites (**re-targeting**). Depending on the scope of the data, a user profile may also be created and evaluated automatically. Here, the advertisements are selected according to the information stored in your profile, such as membership of certain demographic segments or potential interests or behaviours. These advertisements may be displayed to you on various channels, which in addition to our website or app (as part of on-site and in-app marketing), may include advertisements distributed through the online advertising networks we use, such as Google.

The data may then be evaluated for the purpose of billing with the service provider and to evaluate the efficiency of advertising measures in order to better understand the needs of our users and customers and to improve future campaigns. This may also include information that a particular action (such as visiting certain sections of our website or sending information) is due to a specific advertisement. We also receive aggregated reports from service providers on advertisement activity and information on how users interact with our website and advertisements.

The legal basis for this data processing is your consent within the meaning of Art. 6 para. 1 letter a of the GDPR. You can revoke your consent at any time by rejecting or deactivating the respective cookies in your web browser settings (see section 5.2). You can also find more options for blocking advertising in the information provided by the relevant service provider, for example, from [Google](#).

### 5.5.2 Google Ads

As explained in section 5.5.1, this website uses the services of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (**Google**) for online advertising. Google uses cookies for this purpose (see [the list here](#)) which enable your browser to be recognised when you visit other websites. The information generated by the cookies on your visits to these websites (including your IP address) is transmitted to a Google server in the USA and stored there (see sections 4.2 and 4.3 in particular regarding the lack of an appropriate level of data protection and the guarantees provided). You can find more information on data protection at Google [here](#).

The legal basis for this data processing is your consent within the meaning of Art. 6 para. 1 letter a of the GDPR. You can revoke your consent at any time by rejecting or deactivating the respective cookies in your web browser settings (see section 5.2). You can find more ways to block ads [here](#).

## 6. Retention periods

We only store personal data for as long as is necessary to carry out the processing described in this Privacy Policy within the scope of our legitimate interest. In the case of contractual data, storage is required by statutory retention obligations. Requirements which oblige us to retain data arise from accounting regulations and provisions of tax law. In accordance with these provisions, business communications, contracts concluded and accounting documents must be retained for up to 10 years. Insofar as we no longer require said data to perform services for you, access to said data will be blocked. This means that the data may only be used if it is necessary to comply with retention requirements or to defend and enforce our legal interests. The data will be deleted as soon as there is no longer a retention obligation and a justified interest in retention no longer exists.

## 7. Data security

We make use of suitable technical and organisational security measures in order to protect your personal data stored by us against loss and unlawful processing, in particular unauthorised access by third parties. We have obliged our employees and the service providers contracted by us to maintain secrecy and to adhere to data protection. Furthermore, these persons are only granted access to personal data to the extent necessary for performing their tasks.

Our security measures are continually adapted in line with technological developments. However, transferring information via the Internet and via electronic means of communication always entails certain security risks and we therefore cannot absolutely guarantee the security of information transmitted in this manner.

## 8. Your rights

Provided the legal requirements are met, you have the following rights as a person affected by data processing:

**Right to information:** You have the right to request access to your personal data stored by us free of charge and at any time if we process it. This gives you the opportunity to check which personal data we process about you and whether we process it in accordance with the applicable data protection regulations.

**Right to correction:** You have the right to have inaccurate or incomplete personal data corrected and to be informed about the correction. In this case, we will also inform the recipients of the data concerned about the adjustments we have made, unless this is not possible or involves disproportionate effort.

**Right to deletion:** You have the right to have your personal data deleted under certain circumstances. In individual cases, in particular in the case of statutory retention obligations, the right to deletion may be excluded. In this case, the data may be blocked instead of being deleted if the conditions are met.

**Right to restriction of processing:** You have the right to request that processing of your personal data be restricted.

**Right to data transfer:** You have the right to receive from us the personal data that you have provided us with in a readable format free of charge.

**Right to object:** You may object to data processing at any time, in particular where data processing in connection with direct marketing is concerned (such as marketing emails).

**Right of revocation:** In principle, you have the right to withdraw your consent at any time. However, your withdrawal of consent does not render processing activities based on your consent in the past unlawful.

In order to exercise these rights, please send us an email to the following address:  
[datenschutz@hotelarlette.ch]

**Right of appeal:** You have the right to lodge a complaint to a responsible supervisory authority in Switzerland, for example, regarding the manner in which your personal data is processed.