



PRIVACY STATEMENT (DSGVO)

May 2018

The Swiss-Chalet Merlischachen AG, Luzernerstrasse 204 in 6402, Merlischachen, Switzerland, runs the Hotel Swiss-Chalet Lodge as well as the Hotels Jagd-Schloss and Schloss-Hotel as well as the Swiss-Chalet Restaurant, the Chalet Bar, the Badi-Lounge and is the operator of the website www.swiss-chalet.ch and thus responsible for the collection, processing and use of your personal data and the compatibility of data processing with the applicable data protection law.

Your trust is important to us, that's why we take the topic of data protection seriously and pay attention to appropriate security. Of course, we comply with the statutory provisions of the Federal Data Protection Act (DSG), the Federal Data Protection Act (VDSG), the Telecommunications Act (FMG) and other applicable data protection provisions under Swiss or EU law, in particular the General Data Protection Ordinance (DSGVO).

To know what personal information we collect from you and for what purpose we use it, please note the information below.

The address of our data protection representative:

Mr.
Karel Nölliy
Luzernerstrasse 204
6402 Merlischachen
karel.noelly@swiss-chalet.ch

A. Data processing related to our website

1. Visit our website

When visiting our website, our servers temporarily store every access in a log file. The following technical data will be saved by us, as basically every time you connect to a web server, without you having to do so, and until the data is no longer needed until the automated deletion:

- the IP address of the requesting computer
- the name of the owner of the IP address range (your Internet access provider)
- the date and time of access
- the website from which the access was made (referrer URL), if applicable, with the search term used
- the name and URL of the retrieved file
- the status code (for example, 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

The collection and processing of this data is done for the purpose of enabling the use of our website (connection establishment), to ensure the system security and stability on a permanent basis and to optimize our internet presence and for internal statistical purposes. This is our legitimate interest in data processing as defined in Art. 6 para. 1 lit. f DSGVO.

The IP address will also be evaluated together with the other data in case of attacks on the network infrastructure or other unauthorized or abusive website use for information and defense and, where appropriate, in criminal proceedings for identification and civil and criminal proceedings against the users concerned used.

This is our legitimate interest in the processing of data within the meaning of Art. 6 para. 1 lit. f DSGVO.

2. Use of our contact form

You have the option to use a contact form to contact us. For this we need the following information:

- First and last name
- E-mail address
- Telephone number
- County
- Message

We only use this data to answer your contact request in the best possible and personalized way. The processing of this data is therefore within the meaning of Art. 6 para. 1 lit. b DSGVO is required for the implementation of precontractual measures or is in our legitimate interest in accordance with Art. 6 para. 1 lit. f DSGVO.

3. Registration for our newsletter

You can subscribe to our newsletter on our website. This requires a registration. As part of the registration, the following data must be provided:

- First and last name
- E-mail address
- Language

The above data is necessary for data processing. We process this data exclusively in order to personalize the information and offers sent to you and to better align it with your interests. By registering, you give us your consent to the processing of the specified data for the regular sending of the newsletter to the address specified by you and for the statistical evaluation of the user behavior and the optimization of the newsletter. This consent constitutes, within the meaning of Art. 6 para. 1 lit. a DSGVO is our legal basis for the processing of your e-mail address. We are entitled to commission third parties with the technical handling of advertising measures and are entitled to pass on your data for this purpose (see below, no. 13).

At the end of each newsletter there is a link where you can unsubscribe from the newsletter at any time. As part of the deregistration you can voluntarily inform us of the reason for the deregistration. After the cancellation your personal data will be deleted. Further processing takes place only in anonymous form to optimize our newsletter.

4. Opening a customer account

To make reservations on our website, you can order as a guest or create a customer account. When registering for a customer account, we collect the following data:

- Title
- First and last name
- Address
- Date of birth
- Telephone number
- E-mail address
- Password

The collection of these as well as other data voluntarily specified by you (for example company name) takes place for the purpose of providing you with a password-protected direct access to your basic data stored with us. You can view your past and current bookings or manage or change your personal information.

The legal basis for the processing of the data for this purpose lies in the consent given by you pursuant to Art. 6 (1) lit. a DSGVO.

5. Booking on the website, by correspondence or by telephone

If you make bookings either via our website, by correspondence (e-mail or letter post) or by telephone call, we need the following data in order to process the contract:

- Title
- First and last name
- Address
- Telephone number
- Language
- Credit card details
- E-mail address

We will use this data and other information voluntarily provided by you (such as expected time of arrival, motor vehicle license plate, preferences, remarks) only for the purpose of processing the contract, unless otherwise stated in this privacy policy or you have not specifically consented thereto. We will process the data by name in order to record your booking as requested, to make the booked services available, to contact you in case of any uncertainties or problems and to ensure the correct payment.

The legal basis for data processing for this purpose lies in the fulfillment of a contract pursuant to Art. 6 para. 1 lit. b DSGVO.

6. Cookies

Cookies help in many ways to make your visit to our website easier, enjoyable and meaningful. Cookies are information files that your web browser automatically saves to your computer's hard drive when you visit our website.

For example, we use cookies to temporarily store your selected services and submissions when filling out a form on the website, so that you do not have to repeat the entry when you access another subpage. Cookies may also be used to identify you as a registered user after you have registered on the website without having to log in again when you access another subpage.

Most internet browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored on your computer or a note always appears when you receive a new cookie.

Disabling cookies may mean that you can not use all features of our website.

7. Tracking-tools

a. General information

For the purpose of the needs-based design and continuous optimization of our website, we use the web analysis service of Google Analytics. In this context, pseudonymized usage profiles are created and small text files stored on your computer ("cookies") are used. The information generated by the cookie about your use of this website is transmitted to the servers of the providers of these services, stored there and prepared for us. In addition to the items under no. 1, we may receive the following information:

- Navigation path on the site,
- Length of stay on the website or subpage,
- the subpage on which the website will be left,
- the country, region or city from where access is made,
- Terminal (type, version, color depth, resolution, width and height of the browser window),
- Recurring or new visitor.

The information is used to evaluate the use of the website, to compile reports on website activity, and to provide other services related to website activity and internet usage for the purposes of market research and tailoring of this website. This information may also be transferred to third parties if required by law or if third parties process this data in the order.

b. Google Analytics

The provider of Google Analytics is Google Inc., a company of the hosting company Alphabet Inc, based in the US. Before the data is transmitted to the provider, the IP address is activated by activating IP anonymization ("anonymizeIP") on this website within the member states of the European Union or in other contracting states of the European Union Agreement on the European Economic Area. The anonymized IP address provided by Google Analytics within the framework of Google Analytics will not be merged with any other data provided by Google. Only in exceptional cases will the full IP address be sent to a Google server in the US and shortened there. In these



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cases, we provide contractual warranties to ensure that Google Inc. maintains a reasonable level of data protection. According to Google Inc., in no case will the IP address be associated with any other data related to the user.

For more information about the web analytics service used, visit the Google Analytics website. For instructions on how to prevent the processing of your data through the Web Analytics Service, see <http://tools.google.com/dlpage/gaoptout?hl=de>.

8. Social media

The website uses the social plugins described below. The plugins are disabled on our website whenever possible by default and therefore do not send any data. By clicking on the corresponding social media button you can activate the plugins. If these plugins are activated, your browser establishes a direct connection with the servers of the respective social network as soon as you access one of our web pages. The content of the plugin is transmitted by the social network directly to your browser and incorporated by this into the website. The plugins can be deactivated with one click.

a. TrustYou

On our website we use the Social Media Plugin of TrustYou Munich Center of Technology, Agnes-Pockels-Bogen 1, 80992 Munich. Trust You is a service that collects reviews of hotels and processes them into reports. We use data from Trust You to provide our visitors with an independent opinion about service. For more information, please refer to the Privacy Policy of TrustYou.

b. Livebooking / Bookatable

Bookatable is a table reservation system by Livebookings Holdings Limited, 5th Floor, Elizabeth House, 39 York Road, London, SE1 7NQ To provide the service, Bookatable uses an entry in the website cookie. For more information, please refer to the Privacy Policy of Bookatable.

c. TripAdvisor

On our website we use the social media plugin from TripAdvisor Inc., 400 1st Avenue, Needham, MA 02494 USA. TripAdvisor is an online travel industry company that collects reviews of its users on tourism deals, and combines them with booking recommendations. We use the Tripadvisor widget to make our opinions neutral about us. TripAdvisor we will place a cookie on your computer as soon as you open a page with the widget. For more information, please refer to the privacy policy of TripAdvisor.

d. Google Maps

On certain pages you will find maps that are included from Google Maps. Google Maps is a product of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The maps are displayed by I-frame. This means that a foreign website is accessed in that area of the website. The data processing in this iframe is beyond influence. Google will assign the access to your Google Account. Google Maps will write a cookie as soon as the page loads. If you wish to prevent this behavior, you can opt-out of the activation of Google cookies for your browser by using the links provided under "Opt-out / Opt-In".

B. Data edits related to your stay

1. Data processing to fulfill legal reporting obligations

Upon arrival at our hotel, we may need the following information from you and your companion:

- First and last name
- Address
- Country
- Date of birth
- Origin
- Passport and identification number
- Arrival and departure date
- Room number
- E-mail address
- Telephone number
- License plate number of the car (if you use our parking)

We provide this information for the fulfillment of legal reporting obligations, which arise in particular from the hospitality or police law. To the extent that we are required to do so under the applicable regulations, we will forward this information to the appropriate police authority.

In fulfilling the legal requirements, our legitimate interest within the meaning of Art. 6 para. 1 lit. f DSGVO.

2. Acquisition of related services

If you receive additional services during your stay (e.g. making use of the minibar), we will record the object of service as well as the time of receipt of the service for billing purposes. The processing of this data is within the meaning of Art. 6 para. 1 lit. b DSGVO required for the execution of the contract with us. In addition, we reserve the right to save your consumption behavior in order to make you tailor-made offers.

C. Storage and exchange of data with third parties

1. Booking platforms

If you make bookings via a third-party platform, we will receive various personal information from the respective platform operator. These are usually the in lit. 5 of these data protection statements listed data. In addition, inquiries about your booking may be forwarded to us. We will process this data by name in order to record your booking as requested and to make the booked services available. The legal basis for data processing for this purpose lies in the fulfillment of a contract pursuant to Art. 6 para. 1 lit. b DSGVO.

Finally, we may be notified by the platform operators about disputes related to a booking. In doing so, we may also receive data on the booking process, which may include a copy of the booking confirmation as proof of the actual closing of the booking. We process this data to safeguard and enforce our claims. This is our legitimate interest within the meaning of Art. 6 para. 1 lit. f DSGVO.

Please also note the privacy policy of the respective provider.

2. Central storage and linking of data

We store the data specified in paragraphs 2-5 and 8-10 in a central electronic data processing system. The data relating to you are systematically recorded and linked to the processing of your bookings and the processing of the contractual services. For this purpose, we use software from protel hotelsoftware GmbH, Europaplatz 8, 44269 Dortmund, Germany. The processing of this data as part of the software is based on our legitimate interest within the meaning of Art. 6 para. 1 lit. f DSGVO for customer-friendly and efficient customer service management.

3. Retention Period

We only store personal data for as long as is necessary to use the tracking services mentioned above as well as the further processing within the scope of our legitimate interest. Contract data is kept longer by us, as this is required by statutory retention requirements. Retention requirements, which oblige us to keep data, result from regulations about the right to report, over the accounting and from the tax law. According to these regulations, business communication, concluded contracts and accounting documents are to be kept for up to 10 years. Insofar as we no longer need these data to carry out the services for you, the data will be blocked. This means that the data may then only be used for accounting purposes and for tax purposes.

4. Disclosure of data to third parties

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

A service provider, to whom the personal data collected via the website are passed on or who can access or have access to it, is our web host Comfox AG, Bösch 82, 6331 Hühnenberg, Switzerland. The website is hosted on servers in Amsterdam, Netherlands. The transfer of data is for the purpose of providing and maintaining the functionality of our website. This is our legitimate interest within the meaning of Art. 6 para. 1 lit. f DSGVO.

Finally, we will forward your credit card information by credit card payment on the website to your credit card issuer and the credit card acquirer. If you decide to pay by credit card, you will be asked to enter all the necessary information. The legal basis for passing on the data lies in the fulfillment of a contract pursuant to Art. 6 para. 1 lit. b DSGVO. If you request that your third party credit card information be processed, we ask that you also read the terms and conditions and privacy statement of your credit card issuer.

Please also note regarding the data transfer to third parties and the notes in no. 7-8 and 10-11.

5. Transfer of personal data abroad

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

D. Further information

1. Right of information, correction, erasure and restriction of processing; Right to data portability

You have the right to receive information about the personal data that we store about you on request. In addition, you have the right to correct inaccurate data and the right to delete your personal data, as far as there is no statutory storage obligation or an authorization requirement that allows us to process the data.

You also have the right to reclaim from us the data you have given us (right to data portability). On request, we also pass the data on to a third party of your choice. You have the right to receive the data in a common file format.

You can reach us for the aforementioned purposes via the e-mail address karel.noelly@swiss-chalet.ch. We may, at our sole discretion, require proof of identity to process your requests.

2. Data security

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

You should always treat your credentials confidentially and close the browser window if you have stopped communicating with us, especially if you share the computer with others.

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

3. Notice about data transfers to the USA

For the sake of completeness, we would like to point out to users domiciled or domiciled in Switzerland that there are US government surveillance measures that generally require the storage of all personal data of all persons whose data are transferred from Switzerland to the USA United States. This is done without any differentiation, restriction or exception on the basis of the objective pursued and without an objective criterion that would limit the US authorities' access to the data and its subsequent use to very specific, strictly limited purposes, which would allow both to justify access to these data as well as their use. Furthermore, we would like to point out that in the USA there are no legal remedies available for the persons concerned from Switzerland which allow them to obtain access to the data concerning them and to obtain their rectification or deletion, or no effective judicial protection against general legal protection Access rights of US authorities. We explicitly inform the person concerned about this legal and factual situation in order to make a suitably informed decision to consent to the use of his data.



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For users residing in EU Member States, we point out that, from the point of view of the European Union, the USA does not have sufficient data protection levels, partly because of the issues mentioned in this section. To the extent we have explained in this privacy statement that recipients of data (such as Google) are based in the US, we will either be governed by contractual arrangements with these companies or by ensuring that these companies are certified under the EU or Swiss -US-Privacy Shield ensures that your data is protected at a reasonable level by our partners.

4. Right to complain to a data protection supervisory authority

You have the right to complain to a data protection supervisory authority at any time.

Merlischachen, Switzerland, May 25th 2018