

# Privacy Policy – Fresh Hotel

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### 1. Introduction

The protection of our customers' personal data is of primary importance to us. For this reason, Fresh Hotel makes every effort to comply with the legislation relating to the Protection of Personal Data. This Policy sets out the basic principles by which Fresh Hotel processes the personal data it collects.

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### 2. Fundamental Principles Regarding Personal Data Processing

Fresh Hotel, as the data controller, strictly adheres to the data protection principles defined in Article 5 of the General Data Protection Regulation (GDPR).

#### 2.1. Legality, Objectivity, and Transparency

Fresh Hotel processes personal data lawfully, fairly, and in a transparent manner with respect to the data subjects.

#### 2.2. Purpose Limitation

Personal data is collected only for specific, explicit, and legitimate purposes and is not further processed for any other purpose.

#### 2.3. Data Minimization

Fresh Hotel retains accurate personal data of subjects and ensures it is limited to what is necessary for the processing purposes. It also implements appropriate technical measures to achieve the above goals.

#### 2.4. Accuracy

Personal data maintained by Fresh Hotel is accurate and up to date. Actions are taken to ensure that inaccurate data, in relation to the purposes for which it is processed, is deleted or corrected in a timely manner.

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### 3. Collection of Personal Data

"Personal data" means any information relating to an identified or identifiable natural person.

Fresh Hotel collects the following personal data:

- Name, surname, email address, phone number, and home address
  - Credit or debit card information, or other payment details
  - Identity card or passport details (date and place of birth, nationality)
  - Visitor details such as check-in and check-out dates, any special requests, comments regarding service preferences (including room preferences, amenities, or other services used)
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## 4. Purpose of Processing

We process your personal data mainly for the following purposes:

- **A. Reservations:** To carry out and complete your booking.
  - **B. Customer service:** To optimally serve you.
  - **C. Marketing actions:** We may use your data for marketing activities if we have first obtained your consent. In cases where we use your personal data for direct marketing (e.g., newsletters and promotional messages about new products or services or offers), we include an unsubscribe link you can use to stop receiving such messages.
  - **D. Communication:** We may contact you via email, mail, phone, or text message based on your provided contact details. Reasons include:
    - To respond to and manage requests you've submitted.
    - To send you a questionnaire regarding your stay, so you can share your experience. This helps us improve our services.
  - **E. Legal procedures and compliance:** In some cases, we may use your data to manage and resolve legal disputes or complaints, for regulatory investigations and compliance, or to enforce agreements or comply with lawful requests by law enforcement authorities.
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## 5. Legal Basis

Fresh Hotel processes your personal data legally if the processing:

- Is necessary to fulfill your reservation under our contractual relationship.
- Is required for Fresh Hotel's compliance with a legal obligation or to pursue its legitimate interests arising from our contractual relationship or other legal rights.
- Is based on your consent. Where personal data collection is based on consent, Fresh Hotel ensures that you provide it freely, explicitly, and with full awareness of the text content. You may withdraw your consent at any time. For data concerning children under 16, parental consent is required before collection.

If Fresh Hotel intends to process previously collected data for a different purpose, it will request your specific written consent detailing both the original and the new purpose.

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## **6. Security**

Fresh Hotel implements reasonable procedures to prevent unauthorized access and misuse of information, including personal data. We use appropriate business systems and procedures to protect data, and apply physical and technical access restrictions. Only authorized personnel have access to personal data as part of their job.

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## **7. Fresh Hotel's Relationship with Third Parties**

If Fresh Hotel uses third-party suppliers or partners to process personal data on its behalf, it ensures that they provide appropriate security and data protection measures. Fresh Hotel ensures they process the data solely for contractual obligations and in accordance with its instructions.

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## **8. Closed Circuit Surveillance System (CCTV)**

As Fresh Hotel is the data controller of the property, the sole purpose of the video surveillance system is the protection of people and goods from illegal acts (Article 6 par. 1 of the GDPR), ensuring life safety, health, and physical integrity, as well as the property of our clients, staff and third parties, legally

located in the supervised area. We only collect image data, with a specific angle, such as the cashier and entrance, with respect to personal data and in such a way that the privacy of the people whose image is captured is not unduly restricted.

The material collected and kept by the Data Controller is accessible only by our authorized personnel who are responsible for the security of the property and is not transmitted to third parties, except for the competent judicial, prosecutorial, and police authorities or the subject himself if this is requested or becomes necessary due to the occurrence of a specific criminal offense.

The data are kept for fifteen (15) days, after which they are automatically deleted. If during that period an incident occurs, the relevant part of the video is isolated, and that part is kept for a period of one (1) month, to investigate the incident and if necessary to defend our legitimate interests. In case the incident concerns a third party, the material is kept for a period of three (3) months.

In the material collected by such CCTV, data subjects have the rights of access, restriction, objection, and deletion. You can exercise your rights by sending an e-mail to

[info@freshhotel.gr](mailto:info@freshhotel.gr) or a letter to our above postal

address, specifying the exact time and date were in the video surveillance area. Please note that the exercise of the right to object or erasure does not imply the immediate deletion of data or the modification of processing for the reasons mentioned above. In any case, we will reply to you in detail as soon as possible, within the deadlines set by the GDPR. In case you consider that the processing of the data concerning you, violates the GDPR, you have the right to file a complaint to the competent supervisory authority, Data Protection Authority.

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## 9. Data Retention

We retain your information, including personal data, as long as reasonably necessary to:

- Provide our services
- Comply with legal obligations

- Manage legal disputes
- Support business operations, including fraud detection and prevention

All retained data is subject to this Privacy Policy. For specific retention periods, please contact us using the information below.

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## 10. Data Subject Rights

Fresh Hotel, as Data Controller, provides mechanisms for data subjects to access, review, correct, delete, or transfer their personal data.

- **A) Right of Access:** You have the right to be informed and verify the lawfulness of processing. You may access the data and receive additional information.
- **B) Right of Rectification:** You have the right to review, update, correct, or amend your personal data.
- **C) Right to Restrict Processing:** You may request restriction in these cases:
  - When data accuracy is contested, pending verification
  - When you oppose deletion and prefer restricted use
  - When data is no longer needed but you require it for legal claims
  - When you object to processing, pending verification of legitimate grounds
- **D) Right to Object to Processing:** You can object at any time to data processing based on legitimate interests as described.
- **E) Right to Data Portability:** You may request a copy of your digital data in a structured format or its transfer to another data controller, when technically feasible. Fresh Hotel must fulfill such requests within one month unless clearly unfounded.
- **F) Right to Erasure (Right to be Forgotten):** Upon request, you may ask Fresh Hotel to delete your data. Fresh Hotel will act promptly, including ensuring any third parties it uses also delete the data. When data must be legally retained, this right may be limited or void.

If you believe any of your data held by us is incorrect or inaccurate, you may request to view, correct, or delete it. Please contact us through the Data Subject

Access Request form posted [here].

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## **11. Response to Data Breach Incidents**

If Fresh Hotel becomes aware of a suspected or actual personal data breach, it will conduct an internal investigation and take necessary corrective measures in a timely manner, in accordance with the Data Breach Policy. If the breach threatens the rights and freedoms of data subjects, Fresh Hotel must notify the Data Protection Authority without delay and in any case within 72 hours.

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## **12. Contact**

If you have any questions or require clarification about how Fresh Hotel processes your personal data, please email us at: [\*\*info@freshhotel.gr\*\*](mailto:info@freshhotel.gr) and we will gladly assist you.

Website: [www.freshhotel.gr](http://www.freshhotel.gr)