

Privacy Policy of the Laudinella Hotel Group (January 2025)

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1. Responsible Entity and Content of This Privacy Policy

This privacy policy provides information about how and for what purposes the companies belonging to the Laudinella Group (hereinafter also referred to as "we" or "us") process your personal data, which you disclose to us or that we collect from you.

The current privacy policy is not exhaustive; particularly, our general terms and conditions, registration forms, or other information may contain additional information about the processing of your personal data.

The Laudinella Group includes the following entities:

- Laudinella AG, Via Tegiatscha 17, 7500 St. Moritz, Switzerland.
- Laudinella Hotel Group AG, Via Tegiatscha 17, 7500 St. Moritz, Switzerland.
- Lej da Staz AG, Vietta da Staz 3, 7500 St. Moritz, Switzerland.
- Laudinella Hotel Group Shared Services GmbH, Gurlittstraße 22, 20099 Hamburg, Germany.
- Laudinella Hotel Group GmbH, Gurlittstraße 24, 20099 Hamburg, Germany.

The Laudinella Group encompasses hotels Laudinella, Reine Victoria, Corvatsch, and Lej da Staz ("**hotels**"), their associated restaurants and bars - such as Vic's Brasserie, Vic's Bar, Caruso, Restaurant Corvatsch, and Restaurant Lej da Staz ("**restaurants**") - as well as the website www.laudinella.ch/en/ ("**website**")

Different companies within the Laudinella Group may be responsible for processing your personal data depending on the context. The company you communicate with or conduct business with, or the company referred to in a contract or other correspondence, is responsible for processing your personal data as per this privacy policy.

Depending on the nature of data processing, companies within the Laudinella Group may act individually or jointly as data controllers or data processors.

"**Personal data**" includes all information that relates to an identified or identifiable natural person.

To help you understand which personal data we collect and for what purposes we process it, please refer to the information below. We process personal data in compliance with applicable data protection laws, particularly Swiss data protection laws (the Federal Act on Data Protection, "**FADP**") and the European Union's General Data Protection Regulation ("**GDPR**"), where applicable.

Please note that the following information is subject to periodic review and changes. We recommend checking this privacy policy regularly. The valid version is the one published on our website.

2. Data Protection Contact

For all questions and requests related to data protection, regardless of which entity of the Laudinella Group is responsible for processing your data in a given case, you may contact:

Laudinella AG
Via Tegiatscha 17
7500 St. Moritz
Switzerland
Email: christoph.schlatter@laudinella.ch

Our EU Data Protection Representative can be reached at:

Laudinella Hotel Group GmbH
Gurlittstraße 24
20099 Hamburg
Germany
Email: jeannine.postel@lhg.swiss

3. Data Categories, Processing Purposes, and Legal Bases

3.1. Data Sources

We primarily process personal data obtained during our business activities from our guests (current, former, and prospective), cooperation partners (e.g., providers and operators of third-party platforms), interested parties, and website visitors. Where permitted, we may also collect certain personal data from publicly accessible sources (e.g., commercial registers, press, internet) or receive such data from other companies, authorities, or third parties (e.g., offices and courts).

3.2. Notification and Modification of Personal Data

If you provide us with personal data of other individuals (e.g., your companions), you must ensure that these individuals are aware of this privacy policy. Only share such data if authorized and if the data is accurate. To keep your personal data accurate and up-to-date, please inform us of any changes. You can contact our Data Protection Representative (refer to Section 2).

3.3. Data Categories

The categories of personal data we process depend on the requested or agreed services. This may include:

The personal data or categories of personal data that we process include, depending on the case, in particular: **personal and contact data** (e.g. name, address, gender, date of birth, place of birth, marital status, number of children, place of origin and/or nationality, telephone number and e-mail address); **identification and background information** (e.g. passport number, ID number, AHV number, customer or account number, login data, specimen signatures, language); **details of employment** (e.g. job title); **contract data** that we receive or collect in connection with the initiation, conclusion and performance of contracts with you (e.g. data that you have provided or that we have collected from you, e.g. goods and services that you have used or requested, as well as related behavioural and transaction data, financial data for payment purposes such as bank account details); **Communication Data** (e.g. name and contact details such as postal address, e-mail address and telephone number, content of e-mails, written correspondence, chat messages, social media posts, comments on websites, telephone conversations and video conferences (including recordings thereof), proof of identity, marginal data); **documentation data** or data from your **contacts** with third parties (e.g. meeting minutes, file notes, references); **preference and marketing data** (e.g. data on the use of our website or other digital offerings, data in connection with the marketing of products and services such as marketing email subscriptions/unsubscriptions, documents received and special activities, personal preferences and interests); **public data** that can be obtained about you (e.g. commercial register data, data from the media and the press); **data in connection with (potential) proceedings or investigations** by authorities, official bodies, courts, organizations or other bodies; **data for compliance with legal requirements**, such as the fight against money laundering; **image and sound recordings** (e.g. photos, videos and sound recordings of events, recordings of telephone and video conference calls) and **technical data** (e.g. IP address and other device IDs, identification numbers assigned to your device by cookies and similar technologies).

3.4. Purposes of Processing and Legal Bases in the Context of Our Business Activities

We process your personal data primarily for purposes necessary in connection with our business activities and the provision of our services. In doing so, we may process your personal data for the following purposes in particular:

- To **communicate** with you, particularly to provide information or handle your concerns, to authenticate and identify you, and for customer service and customer care.
- For **contract execution**, namely in connection with the initiation, conclusion, and performance of contractual relationships. This includes all data processing necessary or appropriate to enter into, execute, and, if applicable, enforce a contract, such as processing to decide whether and how (e.g., with what payment options) we will enter into a contract with you (including credit checks), to deliver contractually agreed services, to issue invoices for our services, and generally for accounting purposes, processing applications (e.g., managing and evaluating applications, conducting interviews, including creating personality profiles, obtaining references), and enforcing legal claims arising from contracts (e.g., debt collection, legal proceedings).
- To **provide and improve** our products, services, and digital offerings (e.g., website), including market research, quality assurance, and training our employees.
- For customer care and marketing purposes, e.g., to send you written and electronic communications and offers and to conduct marketing campaigns. In this context, we may partially automate the processing of your personal data to evaluate certain personal aspects (profiling) or to create a preselection for your inquiry about a product or service. We may use profiling specifically to inform you about products and services in a targeted manner.
- In connection with **accounting, archiving of data**, and the management of our archives.
- For **training and education**: We may process your personal data to conduct internal training and to train and further educate our employees.
- For the **sale of claims**, e.g., when we provide the purchaser with information about the basis and amount of the claim and, if applicable, the creditworthiness and behavior of the debtor.
- For **security measures**, specifically for **IT and building security** (e.g., access controls, visitor lists, prevention, defense, and investigation of cyberattacks and malware incidents, network and mail scanners, video surveillance, telephone recordings), and to prevent and investigate criminal acts and other misconduct, conduct internal investigations, protect against abuse, serve as evidence, perform data analysis to combat fraud, and evaluate system-generated usage logs (log data).
- In connection with **restructuring** or other **corporate actions** (e.g., due diligence, company sales, management of share registers).
- To **assert legal claims** and **defend** against legal disputes and official proceedings domestically and abroad, including assessing litigation prospects and other legal, economic, and other questions.
- To **comply with our legal, regulatory** (including self-regulatory), and **internal obligations and rules** domestically and abroad, including compliance and risk management and/or the prevention, detection, and investigation of crimes, compliance with court or authority orders.
- To invite you to **events**, organize events, and provide reports and other publications about events (e.g., in the form of texts, photos, videos, and audio recordings).
- For **statistical** purposes.
- Other purposes: We may process your personal data for other purposes necessary to safeguard our **legitimate interests**.

We process your personal data for the aforementioned purposes, depending on the situation, based on the following **legal grounds** in particular:

- The processing of personal data is necessary for the performance of a contract with you or pre-contractual measures.
- You have given your consent to the processing of personal data concerning you.

- The processing of personal data is necessary for compliance with a legal obligation (including compliance checks).
- In some cases, processing is necessary to perform a task carried out in the public interest.
- The processing is necessary to protect the vital interests of the data subject or another natural person.

We have a legitimate interest in processing the personal data. Our legitimate interests may include the following: good customer care, maintaining contact and communication with guests/prospective customers even outside of a contractual relationship; advertising and marketing activities; improving and developing products and services; combating fraud and preventing and investigating crimes; protecting guests, employees, and other individuals, as well as our data, trade secrets, and assets; ensuring adequate security (both physical and digital); ensuring and organizing business operations, including operating and developing websites and other systems; corporate management and development; the sale or purchase of companies, company parts, and other assets; enforcing or defending legal claims; compliance with Swiss and foreign laws and other applicable regulations - provided your privacy interests do not outweigh these interests.

3.5. Data Processing When Contacting Us

If you contact us via our contact addresses and channels (e.g., by email, telephone, or contact form), we process your personal data. Specifically, we process the personal data you provide to us, such as your first and last name, your email address, and your message. Additionally, the time your inquiry is received is documented. Mandatory fields in contact forms are marked with an asterisk (*). We process this personal data to respond to or address your inquiry (e.g., providing information about our hotel, assisting with contract execution, answering questions about your booking, or incorporating your feedback to improve our services).

For handling contact inquiries submitted via contact forms, we use a WordPress software application (WordPress Foundation, based in the USA). As a result, your personal data may be stored in a WordPress database, which may allow WordPress to access your personal data. Information on the processing of personal data by third parties and any potential data transfers abroad can be found in Section 5 of this privacy policy.

The legal basis for this data processing is our legitimate interest under Art. 6(1)(f) GDPR in addressing or responding to your inquiry or, if your inquiry concerns the conclusion or execution of a contract, the performance of necessary pre-contractual measures under Art. 6(1)(b) GDPR.

3.6. Data Processing When Using Our Chatbot Function

If you contact us via the chatbot, we process your personal data. Specifically, the personal data you provide to us, such as the name of your company, your name, your position, your email address, and your request, is processed. Additionally, the time your inquiry is received is documented. Required fields are marked with an asterisk (*). We process this personal data to respond to or implement your request (e.g., providing information about our hotel, supporting contract processing, answering questions about your booking, or incorporating your feedback to improve our services).

To manage communication via the chatbot, we use a software application from DialogShift GmbH (based in Berlin, Germany). Consequently, your personal data may be stored in a database of DialogShift GmbH, which allows DialogShift GmbH access to your data. Information on the processing of personal data by third parties and any potential data transfer abroad can be found in Section 5 of this Privacy Policy.

For operating the chatbot function, chatbot texts are stored, and a cookie with a unique ID is set. This cookie serves to recognize you as a customer. A cookie is a small text file stored locally in your device's cache. Using this cookie, our application recognizes your device and can retrieve previous chatbot logs. You can disable cookie storage in your browser settings. However, without cookies, the chatbot function cannot operate.

The disclosure of, for example, names, email addresses, or phone numbers, is voluntary and with your consent to use and store this data temporarily for contact purposes until the interaction ends.

The legal basis for this data processing is our legitimate interest under Art. 6(1)(f) GDPR in utilizing modern communication technologies or, if your request aims at concluding or processing a contract, the execution of necessary measures under Art. 6(1)(b) GDPR. By voluntarily using the chatbot function, you consent to the corresponding data processing (Art. 6(1)(a) GDPR).

DialogShift GmbH may use some of this data for its own purposes (e.g., sending marketing emails or conducting statistical analyses). For these data processing activities, DialogShift GmbH acts as the data controller and must ensure compliance with data protection laws related to this processing. Information on data processing by DialogShift GmbH can be found at <https://www.dialogshift.com/en-old/data-privacy>.

3.7. Data Processing When Registering for a Customer Account

If you create a customer account on our website, we collect the following personal data, with required fields marked by an asterisk (*) on the corresponding form:

- Personal Details:
 - Title
 - Name
 - First Name
 - Billing and, if applicable, delivery address
 - Date of Birth
 - Company, company address, and VAT number for corporate customers
- Login Data:
 - Email address
 - Password
- Additional Information:
 - Languages
 - Gender

We process personal details to verify your identity and confirm the requirements for registration. Your email address and password serve as login credentials to ensure that the correct individual uses the website under your details. We also process your email address to verify and confirm the account setup and for future communications with you. Furthermore, this personal data is stored in the customer account for future bookings or contract completions. You can also voluntarily store additional details in your account (e.g., preferred payment method).

Personal data is also processed to provide an overview of your bookings and services used (see Section 4) and to offer a simple way to manage your personal data, administer the website, and manage contractual relationships (e.g., related to your bookings with us).

Language and gender details are processed to offer you tailored suggestions for services and offers based on your profile and personal preferences on the website. This also supports statistical analysis and evaluation of chosen offers to optimize suggestions and services.

The legal basis for processing your personal data in the customer account is your consent under Art. 6(1)(a) GDPR. You can withdraw your consent at any time by removing the details from your customer account or deleting your account, or by notifying us to have your account deleted.

3.8. Data processing for orders via our online shops

On our website, you can order products, services, and vouchers. For this purpose, we collect the following personal data and confirmations, with required fields marked by an asterisk (*) during the order process:

3.8.1. Voucher Shop:

- Title
- First Name and Last Name
- Billing and Delivery Address
- Phone Number
- Email Address
- Payment Method
- Delivery Method
- Information about subscribing to marketing emails
- Confirmation of the accuracy of the provided information
- Confirmation of acknowledgment and agreement to the terms and conditions

3.8.2. Delivery Shop:

- Title
- First Name and Last Name
- Billing and Delivery Address
- Phone Number
- Email Address
- Payment Method
- Confirmation of acknowledgment and agreement to the terms and conditions
- Confirmation of acknowledgment of data protection provisions

We process this personal data to verify your identity before concluding a contract. Your email address is required to confirm your order and for future communications. Your personal data is stored alongside order-related metadata (e.g., description, price, and characteristics of the ordered products), payment data (e.g., payment method, confirmation, and time; see also Section 3.11.2), and contract execution details (e.g., receipt and handling of complaints) in our CRM database (see Section 4), simplifying and supporting order processing and contract fulfilment.

The legal basis for this data processing is the fulfilment of a contract with you under Art. 6(1)(b) GDPR.

Providing personal data not marked as required is voluntary. We process this data to tailor our services to your needs, facilitate contract processing, contact you by alternative means if necessary for contract fulfilment, or for statistical analysis and evaluation to optimize our services.

The legal basis for this data processing is your consent under Art. 6(1)(a) GDPR. You can withdraw consent at any time by notifying us.

For the voucher shop, we use software from Idea Creation GmbH (based in Zurich, Switzerland), and your personal data may be stored in their database, giving them access to your data. Information on third-party data processing and potential data transfers abroad can be found in Section 5 of this Privacy Policy.

For the delivery shop, we use software from Deliverect NV (based in Ghent, Belgium), and your personal data may be stored in their database, giving them access to your data. Information on third-party data processing and potential data transfers abroad can be found in Section 5 of this Privacy Policy.

The legal basis for this data processing is the fulfilment of a contract with you under Art. 6(1)(b) GDPR.

Deliverect NV may use some personal data for its purposes (e.g., sending marketing emails or statistical analyses). For such data processing, Deliverect NV is the data controller and must ensure compliance

with data protection laws. Information on Deliverect NV's data processing can be found at <https://www.deliverect.com/en-gb/privacy-and-cookie-notice>.

3.9. Data Processing for Bookings

3.9.1. Booking via Our Website

On our website, you have the option to book an overnight stay. For this purpose, we collect the following personal data and confirmations, with optional information marked as [Optional] during the booking process (all other fields are mandatory):

- Salutation
- First and last name
- Billing address
- Phone number
- Email
- First and last names of accompanying guests
- Payment method
- Booking details
- Comments
- Confirmation of acknowledgment and agreement regarding the terms and conditions

We process this personal data to verify your identity before concluding a contract. Your email address is required to confirm your booking and for future communication with you. We store your personal data along with the booking metadata (e.g., room category, stay period, description, price, and features of the services), payment data (e.g., chosen payment method, payment confirmation, and time; see also section 3.11.2), as well as information related to contract execution and fulfillment (e.g., receipt and handling of complaints) in our CRM database (see section 4). This facilitates and supports the booking process and contract fulfillment.

To the extent required for contract fulfillment, we may share the necessary personal data with third-party service providers (e.g., event organizers or transport companies).

The legal basis for this data processing is the performance of a contract with you under Article 6(1)(b) of the GDPR.

Providing personal data to us that is not marked as mandatory is voluntary. We process such personal data to tailor our services to your individual needs, simplify contract execution, contact you via alternative communication methods if necessary, or for statistical analysis and evaluation to optimize our offerings. The legal basis for this data processing is your consent under Article 6(1)(a) of the GDPR. You can withdraw your consent at any time by notifying us.

For the booking process on our website, we use a software application from Hotelpartner Management GmbH (based in Schindellegi, Switzerland). Consequently, your personal data may be stored in a database managed by Hotelpartner Management GmbH, which could provide them access to your personal data. Information about data processing by third parties and potential data transfers abroad can be found in section 5 of this Privacy Policy.

The legal basis for this data processing is the performance of a contract with you under Article 6(1)(b) of the GDPR.

3.9.2. Booking via a Third-Party Platform

If you book through a third-party platform (e.g., Booking, Hotels.com, ebookers, Agoda, TUI, STC, Escapio, Expedia, Holidaycheck, HRS, Kayak, Tripadvisor, Trivago), we receive various personal data

about you from the platform operator in connection with your booking. This typically includes the personal data outlined in section 3.11.2 of this Privacy Policy. Additionally, any inquiries regarding your booking may be forwarded to us. We process this personal data to record your booking according to your wishes and provide the booked services.

The legal basis for this data processing is the performance of pre-contractual measures and the fulfillment of a contract under Article 6(1)(b) of the GDPR.

Finally, in connection with disputes or complaints regarding a booking, we may exchange personal data with the platform operator as necessary to protect our legitimate interests. This may include personal data provided during the booking process on the platform or data related to service provision and your stay with us. We process such personal data to protect our legitimate claims and interests in managing and maintaining our contractual relationships.

Your personal data is stored in the platform operator's database, enabling them to access your data. Information about data processing by third parties and potential data transfers abroad can be found in section 5 of this Privacy Policy. The legal basis for this data processing is our legitimate interest under Article 6(1)(f) of the GDPR, namely in efficient reservation management, fraud prevention, and defense of our legal position.

3.10. Data Processing for Table Reservations

On our website, you have the option to reserve a table at one of the restaurants listed on our site. For this purpose, we collect the following personal data and confirmations, depending on the specific offer. Mandatory fields for reservations on the website are marked with an asterisk (*):

- First name and last name
- Number of guests
- Email address
- Phone number
- Comments
- Name of the restaurant
- Date and time of the reservation
- Information on subscribing to marketing emails
- Acknowledgment and agreement with terms of use

We process this personal data to handle your reservation, specifically to fulfill your reservation request as per your preferences and to contact you in case of any uncertainties or issues. We store your personal data along with reservation details (e.g., date and time of request), reservation-related information (e.g., assigned table), and data regarding contract execution and fulfillment (e.g., handling of complaints) in our CRM database (see Section 4 for details) to simplify and support reservation management and contract fulfillment.

For table reservation processing, we use a software application from Lunchgate AG (headquartered in Zurich, Switzerland). Your personal data may, therefore, be stored in Lunchgate AG's database, granting them access to your data. Information about data processing by third parties and any potential transfer of data abroad can be found in Section 5 of this privacy policy.

The legal basis for this data processing is the performance of a contract with you under Art. 6(1)(b) GDPR.

Lunchgate AG may use some of this data for its own purposes (e.g., to send marketing emails or conduct statistical analyses). For such data processing, Lunchgate AG is the data controller and must ensure compliance with data protection laws. Information about data processing by Lunchgate AG can be found at <https://go.foratable.com/datenschutzerklaerung-gaeste>.

3.11. Data processing for payment transactions

3.11.1. Payment processing at our hotels

When you purchase products, use services, or pay for your stay using electronic payment methods at one of our hotels, we process your personal data. By using the payment terminals, you transmit the information stored in your payment method, such as the cardholder's name and card number, to the involved payment service providers (e.g., payment solution providers, credit card issuers, and acquirers). These providers also receive information about the payment method used at one of our hotels, the amount, and the transaction time. Conversely, we only receive the payment amount credited at the corresponding time, which we link to the relevant receipt number, or a notification that the transaction was unsuccessful or canceled. Please always review the information provided by the respective payment service provider, including their privacy policy.

The legal basis for our data processing in payment transactions is the performance of a contract with you under Art. 6(1)(b) GDPR.

3.11.2. Online payment processing

When you make paid bookings or order services or products on our website, additional personal data, such as your credit card details or login credentials for your payment provider, may be required, depending on the product or service and desired payment method, in addition to the personal data and confirmations mentioned in Section 3.9.1. This personal data, along with the fact that you purchased a service for the corresponding amount and time, is forwarded to the respective payment service providers (e.g., payment solution providers, credit card issuers, and acquirers). Please always review the information provided by the respective payment service provider, including their privacy policy.

The legal basis for our data processing in online payment transactions is the performance of a contract with you under Art. 6(1)(b) GDPR.

We reserve the right to store a copy of your credit card details as a security measure. To prevent payment defaults, required data, particularly your personal details, may also be transmitted to a credit agency for an automated credit assessment.

The legal basis for this data processing is our legitimate interest under Art. 6(1)(f) GDPR in preventing payment defaults.

3.12. Data Processing for Recording and Billing Services Used

If you use additional services during your stay (e.g., additional nights, wellness, restaurant, activities), we process the booking data (e.g., time and remarks) and data related to the booked and used service (e.g., service description, price, and time of use), in addition to your contract data, to manage and process the service as described in Sections 3.9 and 3.10.

The legal basis for this data processing is the performance of a contract under Art. 6(1)(b) GDPR.

3.13. Data Processing for Email Marketing

If you register for our marketing emails (e.g., when creating an account, on our website, or as part of an order, booking, or reservation), we collect the following personal data. Mandatory fields are marked with an asterisk (*):

- Email address
- Salutation
- First name and last name

To prevent misuse and ensure that the owner of an email address has genuinely consented to receive marketing emails, we use a double-opt-in process. After registration, you will receive an email with a confirmation link. To finalize your registration, you must click this link. If you do not confirm your email address within the specified time, your data will be deleted, and you will not receive our marketing emails.

By registering, you consent to the processing of this personal data to receive marketing emails about our hotels and related products and services. These emails may also include invitations to participate in contests, provide feedback, or review our products and services. Collecting salutation and name helps us personalize the content of the marketing emails and link the registration to an existing customer account if applicable, making the emails more relevant to your potential needs.

We process your personal data for marketing emails until you revoke your consent. You can revoke your consent at any time, particularly via the unsubscribe link included in all marketing emails.

Our marketing emails may include a web beacon, a 1x1 pixel (tracking pixel), or similar tools linked to the subscriber's user ID. These allow us to gather statistics such as delivery success, email opening rates, and link clicks. The beacon is deleted when you delete the email. You can disable HTML display in emails in your email client settings to prevent the use of web beacons, for instance [here](#) for Microsoft Outlook.

The legal basis for this processing is your consent under Art. 6(1)(a) GDPR.

For marketing emails, we use a software application from Revinate LLC (headquartered in Palo Alto, USA). As a result, your data may be stored in Revinate LLC's database, granting them access. Details about third-party data processing and potential transfers abroad can be found in Section 5 of this privacy policy.

Revinate LLC may process some of this data for its purposes (e.g., for marketing emails or statistical analyses). For such processing, Revinate LLC is the data controller and must ensure compliance with data protection laws. Information about Revinate LLC's data processing can be found at <https://www.revinate.com/privacy/>.

3.14. Data Processing for Guest Feedback Submission

During or after your stay, you have the option to provide feedback (e.g., praise, criticism, suggestions) using a form. The following personal data and information are collected for this purpose, with mandatory fields marked with an asterisk (*):

- Salutation
- First name and last name
- Duration of stay
- Booked hotel
- Feedback

We process your personal data for quality management purposes to better align our services and products with guest needs. Specifically, we process your data for:

- Resolving your concern, including gathering statements from staff and supervisors or asking you follow-up questions;
- Evaluating and analyzing your feedback, e.g., creating satisfaction statistics or comparing specific services;
- Taking organizational actions based on insights, e.g., repairing defects, providing instructions, or issuing praise or warnings to staff.

For guest feedback, we use a software application from Revinate LLC. As a result, your data may be stored in Revinate LLC's database, granting them access. Details about third-party data processing and potential transfers abroad can be found in Section 5 of this privacy policy.

The legal basis for this processing is your consent under Art. 6(1)(a) GDPR. You can revoke your consent at any time with future effect.

Revinat LLC may use some of this data for its purposes (e.g., sending marketing emails or conducting statistical analyses). For such processing, Revinat LLC is the data controller and must ensure compliance with data protection laws. Information about Revinat LLC's data processing can be found at <https://www.revinat.com/privacy/>.

3.15. Data processing in video surveillance

To protect our guests and employees as well as our property, and to prevent and address unlawful behavior (in particular, theft and property damage), the entrance area and publicly accessible areas of our hotel, with the exception of sanitary facilities, may be monitored by cameras. The video footage is reviewed only if there is a suspicion of unlawful behavior. The recordings are automatically deleted after 48 hours.

The legal basis for this data processing is our legitimate interest according to Art. 6 para. 1 lit. f GDPR in protecting our property, preventing and prosecuting unlawful behavior, and ensuring the safety of our guests and employees.

3.16. Data processing for compliance with legal reporting obligations

Upon arrival at one of our hotels, we may require the following information from you and your accompanying persons, with mandatory fields marked with an asterisk (*) on the corresponding form:

- First and last names of all guests
- Billing address
- Date of birth of all guests
- Nationality of all guests
- Identity card or passport number of all guests
- Arrival and departure date

We collect this information to comply with legal reporting obligations, particularly those arising from hospitality or police regulations. Where required by applicable regulations, we forward this information to the relevant authority.

The legal basis for processing this personal data is the fulfilment of our respective legal obligations in accordance with Article 6(1)(c) of the GDPR.

3.17. Data processing for job applications

You have the option to apply to us either spontaneously or for a specific job posting. Upon receipt of your application, we process the personal data you have provided.

Specifically, we process the personal data you disclose to evaluate your application and assess your suitability for employment. Application documents from applicants who are not considered will be deleted after the application process concludes, unless you explicitly agree to a longer retention period or we are legally required to retain them for a longer period.

For the management of applications, we use a software application provided by Ostendis AG (headquartered in Boniswil, Switzerland). As a result, your data may be stored in a database maintained by Ostendis AG, which may allow Ostendis AG to access your data. Information about the processing of personal data by third parties and any potential transfer of data abroad can be found in section 5 of this privacy policy.

The legal basis for processing your personal data for this purpose is the execution of a contract (pre-contractual phase) in accordance with Article 6(1)(b) of the GDPR.

4. Central Data Storage and Analysis in the CRM System

If a clear assignment to your person is possible, we will store and link the personal data described in this privacy policy - i.e., in particular, your personal details, your contact interactions, your contract data, and your browsing behavior on our websites—in a central database. This serves the efficient management of customer data and enables us to adequately process your inquiries, efficiently provide the services you desire, and handle the associated contracts.

The legal basis for this data processing in connection with data storage is our legitimate interest pursuant to Art. 6(1)(f) GDPR in the efficient management of user data.

We may analyze your personal data to further develop our offerings in a needs-oriented manner and to display and propose information and offers that are as relevant as possible to you. We also use methods that predict possible interests and future orders based on your use of our website.

For central data storage and analysis in the CRM system, we use a software application provided by Revinat LLC (headquartered in Palo Alto, USA). As a result, your data may be stored in a database maintained by Revinat LLC, which could allow Revinat LLC to access your data. Information about the processing of personal data by third parties and any potential transfer of data abroad can be found in Section 5 of this privacy policy. Further information about Revinat LLC's data processing can be found at <https://www.revinat.com/privacy/>.

The legal basis for this data processing in connection with data analysis is our legitimate interest pursuant to Art. 6(1)(f) GDPR in conducting marketing activities.

5. Disclosure of Personal Data to Recipients and Abroad

5.1. Disclosure of Personal Data to Recipients

Without the support of other companies, we would not be able to provide our services in the desired manner. To use the services of these companies, it is necessary to disclose your personal data to a certain extent. Such disclosure is made to selected third-party service providers and generally only to the extent required for the optimal provision of our services.

Various third-party service providers are already explicitly mentioned in this privacy policy. In addition to the expressly stated data disclosures, we may disclose personal data, where permitted, to the following categories of recipients:

- Providers to whom we have outsourced certain services (e.g., IT and hosting providers, service providers related to hotel operations and management, advertising and marketing services, business administration including accounting and/or asset management, debt collection services, photographers) as well as other suppliers and subcontractors;
- Companies belonging to the Laudinella Group;
- Companies that provide hotel services in close cooperation with the Laudinella Group (e.g., cooperation partners, including travel agencies and booking platforms);
- Contractual partners (e.g., organizers of seminars, readings, concerts), guests, and other involved persons: If you work for one of our contractual partners (e.g., a guest, organizer, or supplier) or attend an event organized by a contractual partner (e.g., a seminar, reading, or concert), we may transmit your personal data to them;
- Third parties involved in fulfilling guest requests and providing services (e.g., as part of our sports and wellness offerings);
- Other guests (especially your family members or accompanying persons, as well as your employees or participants in an event you are attending);
- Third-party software application providers that we use in our business operations or make available to our guests;

- Third parties who collect data about you via websites;
- Consulting service providers, such as lawyers, tax advisors, auditors, and business consultants;
- Authorized representatives;
- Banks and insurance companies;
- Credit rating agencies that store this data for credit assessments;
- Potential buyers or investors in the event of restructuring or other corporate transactions (e.g., due diligence reviews);
- Auditors;
- Parties in potential or actual legal disputes or legal proceedings;
- Domestic and foreign authorities, government offices, or courts.

5.2. Disclosure of Personal Data Abroad

As a general rule, we process your personal data in Switzerland and Germany. However, in certain cases, your personal data may be transferred abroad, for example, when engaging specific service providers or using certain software applications. Some instances of cross-border data transfers are mentioned in Section 3.

The countries to which data is transmitted include those that have been recognized by the Swiss Federal Council and the EU Commission as having an adequate level of data protection (such as EEA member states or, from the EU's perspective, Switzerland). However, data may also be transferred to countries that are not considered to have an adequate level of data protection (see Annex 1 of the Swiss Data Protection Ordinance (DSV) and the EU Commission's website).

If we transfer personal data to a country without adequate legal data protection, we ensure an appropriate level of protection as required by law, primarily by using appropriate contracts (notably based on the so-called Standard Contractual Clauses of the European Commission) or relying on statutory exceptions such as consent, contract execution, establishment, exercise, or enforcement of legal claims, overriding public interest, publicly disclosed personal data, or necessity for the protection of the integrity of the affected persons.

However, we draw your attention to the fact that data transferred abroad is no longer protected by Swiss law, and foreign laws and government regulations may require the disclosure of such data to authorities and other third parties.

Depending on the applicable data protection legislation, you may request additional information and obtain a copy of the guarantees we have put in place by contacting the postal address of the responsible entity (see Section 2). Before such transfers, we may conclude an agreement with you or implement the necessary legal, operational, and technical measures required under applicable law.

6. Data Processing on Our Website

6.1. Data Processing When Visiting Our Website (Log File Data)

When visiting our website, the servers of our hosting provider Cyon GmbH (based in Basel, Switzerland) temporarily store each access in a log file. The following data is collected automatically and stored by us until its automated deletion:

- IP address of the requesting computer;
- Date and time of access;
- Name and URL of the retrieved file;
- Website from which access was made, possibly including the search term used;

- Operating system of your computer and the browser you use (including type, version, and language settings);
- Device type in the case of access via mobile phones;
- City or region from which the access occurred; and
- Name of your internet access provider.

The collection and processing of this data serve the purpose of enabling the use of our website (connection setup), ensuring system security and stability on an ongoing basis, enabling error and performance analysis, and optimizing our website (see also section 6.3 for the last points).

In the event of an attack on the website's network infrastructure or suspected unauthorized or abusive use of the website, the IP address and other data are analyzed to investigate and prevent such incidents and, if necessary, used to identify the relevant user in civil or criminal proceedings.

The legal basis for data processing when visiting our website (see also the following sections) is primarily based on Article 6(1)(f) GDPR. Our legitimate interest is to ensure the functionality, security, and optimization of our website and to provide a user-friendly and efficient online presence. This also includes analyzing user behavior to continuously improve our offerings and adapt them to the needs of our visitors. By voluntarily revisiting our website, you consent to the corresponding data processing (Article 6(1)(a) GDPR).

Finally, we use cookies as well as applications and tools based on cookies when visiting our website. The data described here may also be processed in this context. Further details can be found in the following sections of this privacy policy, particularly in section 6.2.

6.2. Cookies

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

Cookies help make your visit to our website easier, more pleasant, and more meaningful. We use cookies for various purposes that are necessary for your intended use of the website, i.e., "technically necessary." For example, we use cookies to identify you as a registered user after logging in so that you do not have to log in again when navigating through different subpages. The provision of order and booking functions is also based on the use of cookies. Furthermore, cookies perform other technical functions necessary for the operation of the website, such as load balancing (distributing the website's performance load across multiple web servers to relieve the servers). Cookies are also used for security purposes, such as preventing unauthorized posting of content. Finally, we use cookies in the design and programming of our website, e.g., to enable the uploading of scripts or codes.

The legal bases for data processing when visiting our website are described in section 6.1.

Most internet browsers accept cookies automatically. However, when accessing our website, we ask for your consent to use cookies that are not technically necessary, particularly when using third-party cookies for marketing purposes. You can make your desired settings via the corresponding buttons in the cookie banner. Details about the services and data processing associated with individual cookies can be found in the cookie banner as well as in the following sections of this privacy policy.

You may also configure your browser so that no cookies are stored on your computer or a message appears each time you receive a new cookie. You can find explanations on how to configure cookie settings for selected browsers on the following pages:

- [Google Chrome for Desktop](#)
- [Google Chrome for Mobile](#)
- [Apple Safari](#)

- [Microsoft Windows Internet Explorer](#)
- [Microsoft Windows Internet Explorer Mobile](#)
- [Mozilla Firefox](#)

Disabling cookies may result in you not being able to use all functions of our website.

6.3. Tracking and Web Analysis Tools

6.3.1. General Information on Tracking

To design and continuously optimize our website according to user needs, we use the web analysis services listed below. In this context, pseudonymized user profiles are created and cookies are used (see also section 6.2). The information generated by the cookie about your use of this website is usually transmitted to a server of the service provider, stored, and processed there, along with the log file data listed in section 6.1. This may also involve transmission to servers abroad, e.g., in the USA (see section 5.2 regarding the lack of an adequate level of data protection).

By processing this data, we obtain, among other things, the following information:

- Navigation path taken by a visitor on the website (including viewed content and selected or purchased products or booked services);
- Time spent on the website or subpage;
- The subpage from which the website was exited;
- Country, region, or city from which an access occurred;
- End device (type, version, color depth, resolution, width, and height of the browser window); and
- Whether the visitor is a returning or new user.

On our behalf, the provider uses this information to evaluate website usage, compile website activity reports, and provide other services related to website usage and internet usage for market research and demand-oriented design of this website. For these processing activities, we and the providers may, to a certain extent, be considered joint controllers under data protection law (if the applicable data protection law recognizes this concept).

The legal basis for data processing in connection with tracking and web analysis tools is primarily your consent in accordance with Article 6(1)(a) GDPR. You can revoke your consent at any time or refuse processing by rejecting or disabling the relevant tracking and web analysis tools in your browser settings (see section 6.2) or by using the service-specific options described below. The legal bases for data processing when visiting our website are described in section 6.1.

For further processing of the data by the respective provider as the sole data controller under data protection law, particularly any potential disclosure of data to third parties, such as authorities based on national legal regulations, please refer to the provider's respective privacy policies.

6.3.2. Google Analytics

We use the web analytics service "Google Analytics" from Google Ireland Limited (based in Dublin, Ireland) or Google LLC (based in Mountain View, USA; collectively referred to as "Google").

Unlike the description in section 6.3.1, Google Analytics (in the version used here, "Google Analytics 4") does not record or store IP addresses, according to Google's statement: For accesses originating from the EU, IP address data is only used to derive location data and is then deleted. When collecting measurement data in Google Analytics, all IP lookups are performed on EU-based servers before the traffic is forwarded to analytics servers for processing. Google Analytics uses regional data centers. If a connection is made to the nearest available Google data center, measurement data is transmitted to Google via an encrypted HTTPS connection. In these centers, the data is further encrypted before being forwarded to Google's analytics processing servers and made available on the platform. The most

appropriate local data center is determined based on IP addresses. This may also involve data disclosure to servers abroad, e.g., in the USA (see section 5.2, particularly regarding the lack of an adequate level of data protection).

We also use the technical extension "Google Signals," which enables cross-device tracking. This allows the association of a single website visitor with different devices. However, this only occurs if the visitor is logged into a Google service during their website visits and has also activated the "personalized advertising" option in their Google account settings. Even in this case, no personal data or user profiles are accessible to us; they remain anonymous. If you do not wish to use "Google Signals," you can deactivate the "personalized advertising" option in your Google account settings.

According to Google, users can prevent the collection of data generated by the cookie and related to their website usage (including IP address) by Google, as well as the processing of this data by Google, by downloading and installing the browser plugin available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

Alternatively, users can click this link to prevent future data collection by Google Analytics on the website. This will set an opt-out cookie on the user's device. If users delete cookies (see section 6.2), the link must be clicked again.

6.4. Social Media

6.4.1. Social Media Profiles

On our website, we have included links to our profiles on the following social media networks:

- Facebook and Instagram by Meta Platforms Inc., Palo Alto, USA (hereinafter "Meta"), [privacy notices](#);
- YouTube by Google, [privacy notices](#).

When you click on the social network icons, you are automatically redirected to our profile on the respective network. A direct connection is then established between your browser and the respective social network's server, informing the network that you have visited our website with your IP address and clicked the link. This may also involve data disclosure to foreign servers, e.g., in the USA (see section 5.2, particularly regarding the lack of an adequate level of data protection).

If you click on a network link while logged into your user account on that network, the content of our website may be linked to your profile, allowing the network to directly associate your visit to our website with your account. To prevent this, you should log out before clicking the relevant links. A connection between your access to our website and your user account will occur in any case if you log in to the respective network after clicking the link. The data processing associated with this is the responsibility of the respective provider. Please refer to the privacy notices on the respective network's website.

The legal basis for any data processing attributed to us is our legitimate interest under Art. 6(1)(f) GDPR in using and promoting our social media profiles.

6.4.2. Social Media Plugins

On our website, you can use social media plugins from the following providers:

- Facebook and Instagram by Meta, [privacy notices](#);
- YouTube by Google, [privacy notices](#);

We use social media plugins to facilitate the sharing of content from our website. These plugins help increase the visibility of our content on social networks and contribute to better marketing.

By default, the plugins on our website are deactivated and do not send data to social networks when you simply visit our website. To enhance data protection, we have integrated the plugins so that a connection to the network's servers is not automatically established. Only when you activate the plugins by clicking

on them and thereby consent to data transmission and processing by the social network providers does your browser establish a direct connection to their servers.

The content of the plugin is transmitted directly from the social network to your browser and integrated into the website. This provides the respective provider with the information that your browser has accessed the corresponding page on our website, even if you do not have an account with that social network or are not currently logged in. This information (including your IP address) is transmitted directly from your browser to a server of the provider (usually in the USA) and stored there (see section 5.2 regarding the lack of an adequate level of data protection). We have no control over the extent of the data collected by the provider via the plugin, although we may, to some extent, be considered joint controllers from a data protection perspective (where applicable law recognizes this concept).

If you are logged into the social network, it can directly associate your visit to our website with your user account. If you interact with the plugins, the corresponding information is also transmitted directly to the provider's server and stored there. This information (e.g., that you like a product or service of ours) may also be published on the social network and possibly shown to other users. The provider may use this information for advertising and personalized services, potentially creating user, interest, and relationship profiles based on usage behavior.

If you do not want the social network provider to associate data collected via our website with your user account, you must log out before activating the plugins. The legal basis for the described data processing is your consent under Art. 6(1)(a) GDPR. You can withdraw your consent at any time by following the instructions in the respective provider's privacy notices.

6.5. Online Advertising and Targeting

6.5.1. General Information

We use services from various companies to present you with interesting offers online. In doing so, your user behavior on our website is analyzed in order to be able to display individually tailored online advertising to you.

Most technologies for tracking your user behavior (tracking) and for the targeted display of advertising (targeting) work with cookies (see also Section 6.2 f.), which allow your browser to be recognized across different websites. Depending on the service provider, it may also be possible for you to be recognized online even when using different devices (e.g. laptop and smartphone). This can happen, for example, if you are registered with a service that you use on multiple devices.

In addition to the data already mentioned, which are collected when accessing websites (logfile data, see Section 6.1) and when using cookies (Section 6.2), and which may be transmitted to companies involved in advertising networks, the following data in particular are used to select the advertising most relevant to you:

- Information you provide when registering or using a service of advertising partners (e.g., gender, age group);
- User behavior (e.g., search queries, interactions with ads, visited website types, viewed and purchased products or services, subscribed newsletters).

We and, if applicable, 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 visiting our website, you may be shown ads for the products or services you viewed when visiting other websites (re-targeting). Depending on the scope of the data, a user profile may be created and evaluated automatically, with ads being selected based on the information stored in the profile, such as affiliation with certain demographic segments or potential interests or behaviors. Such ads may be displayed to you via various channels, which include our website or app (as part of on-site and in-app marketing), as well as ads placed through online advertising networks we use, such as Google.

The data may then be evaluated for the purpose of billing with the service provider and for assessing the effectiveness of advertising measures, in order to better understand the needs of our users and customers and improve future campaigns. This may also include information indicating that a specific action (e.g. visiting certain sections of our website or submitting information) can be attributed to a particular advertisement. Furthermore, we receive aggregated reports from service providers on ad activities and information on how users interact with our website and ads.

The legal basis for this data processing is your consent in accordance with Art. 6 (1) lit. a GDPR. You can withdraw your consent at any time by rejecting or disabling the relevant cookies in your web browser settings (see section 6.2). Further options for blocking advertising can also be found in the information provided by the respective service providers, such as [Google](#).

6.5.2. Google Ads

Our website uses Google's services for online advertising, as explained in section 6.5.1. Google uses cookies (see the [list here](#)) that enable the recognition of your browser when visiting other websites. The information generated by the cookies about the visit to these websites (including your IP address) is transmitted to a Google server in the USA and stored there (see in particular section 5.2 regarding the lack of an adequate level of data protection). Further information about data protection at Google can be found [here](#).

The legal basis for this data processing is your consent in accordance with Art. 6 para. 1 lit. a GDPR. You can revoke your consent at any time by rejecting or disabling the relevant cookies in your web browser settings (see section 6.2). Further options for blocking advertising can be found [here](#).

7. Retention Periods

We retain personal data only for as long as necessary to carry out the processing activities described in this privacy policy within the scope of our legitimate interests. We process your personal data as long as it is required to fulfill our contractual and legal obligations or for the purposes pursued with the processing, or if another legal basis, such as retention obligations, exists. We retain contract data for at least as long as the contractual relationship exists and limitation periods for potential claims are running or contractual retention periods apply. Obligations requiring us to retain data primarily arise from accounting regulations and tax laws. According to these regulations, business communications, concluded contracts, and booking records must generally be retained for up to 10 years. Data will be deleted as soon as no retention obligation or legitimate interest in retention exists.

8. Data Security

We employ appropriate technical and organizational security measures to protect your personal data stored with us against loss and unauthorized processing, particularly unauthorized access by third parties. Our employees and service providers engaged by us are generally obligated to maintain confidentiality and uphold data protection. Furthermore, access to personal data is granted to these persons only to the extent necessary for the fulfillment of their tasks.

Our security measures are continuously adapted in line with technological developments. However, transmitting information over the internet and via electronic communication channels always carries certain security risks, and we cannot guarantee the security of information transmitted in this manner.

9. Your Rights

Under the applicable data protection laws and to the extent provided therein, you have the following rights:

Right of access: You may have the right to request information about the personal data we have stored about you, provided we process such data.

Right to rectification: You may have the right to have inaccurate or incomplete personal data corrected.

Right to erasure: You may have the right to have your personal data deleted under certain circumstances. In individual cases, particularly where legal retention obligations exist, the right to erasure may be excluded. In such cases, data may be blocked instead of deleted, provided the necessary conditions are met.

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

Right to data portability: You may have the right to receive the personal data you have provided to us in a readable format or to have it transferred to a third party.

Right to object: You may object to data processing, particularly data processing related to direct marketing (e.g., marketing emails).

Right to withdraw consent: You generally have the right to withdraw your consent at any time with effect for the future. However, your withdrawal does not render past processing based on your consent unlawful.

Please note that we reserve the right to enforce the legally prescribed limitations on these rights, such as when we are obliged to retain or process certain data, have an overriding interest (where legally permissible), or require the data for asserting claims. If costs arise for you, we will inform you in advance.

To exercise these rights, please send us an email at the following address: christoph.schlatter@laudinella.ch. Exercising these rights generally requires clear proof of your identity (e.g., a copy of an identification document if your identity is otherwise unclear or cannot be verified).

Right to lodge a complaint: You have the right to file a complaint with the competent supervisory authority. The responsible data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).