

# Privacy Policy

This Privacy Statement describes the privacy practices of the Kritika Xenodoxeia Private Company, Kavros Apokoronou, 73007, Chania, Crete for data that we collect:

- through websites operated by us from which you are accessing this Privacy Statement, including [www.pepperhotel.gr](http://www.pepperhotel.gr) and other websites owned or controlled by the "Kritika Xenodoxeia Private Company" (collectively, the "Websites")
- through the software applications made available by us for use on or through computers and mobile devices (the "Apps")
- through our social media pages that we control from which you are accessing this Privacy Statement (collectively, our "Social Media Pages")
- through HTML-formatted email messages that we send you that link to this Privacy Statement and through your communications with us
- when you visit or stay as a guest at one of our properties, or through other offline interactions

Collectively, we refer to the Websites, the Apps and our Social Media Pages, as the "Online Services" and, together with offline channels, the "Services." By using the Services, you agree to the terms and conditions of this Privacy Statement.

## Collection of Personal Data

"Personal Data" are data that identify you as an individual or relate to an identifiable individual.

We collect Personal Data in accordance with law, such as:

- Name, Email address, Phone number

In more limited circumstances, we also may collect:

- Data about family members and companions, such as names and ages of children
- Images and video and audio data via: security cameras about during your visit

If you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

## How We Collect Personal Data

We collect Personal Data in a variety of ways:

- **Online Services.** We collect Personal Data when you make a reservation, purchase goods and services from our Websites or Apps, communicate with us, or otherwise connect with us or post to social media pages, or sign up for a newsletter or participate in a survey, contest or promotional offer.
- **Property Visits and Offline Interactions.** We collect Personal Data when you visit our properties or use on-property services and outlets, such as restaurants, concierge services, health clubs, child care services, and spas. We also collect Personal Data when you attend promotional events that we host or in which we participate, or when you provide your Personal Data to facilitate an event.
- **Customer Care Centers.** We collect Personal Data when you make a reservation over the phone, communicate with us by email, fax or via online chat services or contact customer service. These communications may be recorded for purposes of quality assurance and training.
- **Strategic Business Partners.** We collect Personal Data from companies with whom we partner to provide you with goods, services or offers based upon your experiences at our properties or that we believe will be of interest to you ("Strategic Business Partners"). Examples of Strategic Business Partners include on-property outlets, travel and tour partners, timeshare partners, rental car providers and travel booking platforms. Strategic Business Partners are independent from the "Kritika Xenodoxeia Private Company".
- **Other Sources.** We collect Personal Data from other sources, such as public databases, joint marketing partners and other third parties.
- **Internet-Connected Devices.** We collect Personal Data from internet-connected devices available in our properties. For example, a smart home assistant may be available for your use and to tailor your accommodations and experience.

- **Physical & Mobile Location-Based Services.** We collect Personal Data if you download one of our Apps or choose to participate in certain programs. For example, we may collect the precise physical location of your device by using satellite, cell phone tower, Wi-Fi signals, or other technologies. We will collect this data if you opt in through the App or other program (either during your initial login or later) to receive the special offers and to enable location-driven capabilities on your mobile device. If you have opted-in, the App or other program will continue to collect location data when you are in or near a participating property until you log off or close application (i.e., the App or other program will collect this data if it is running in the background) or if you use your phone's or other device's setting to disable location capabilities for the "Kritika Xenodoxeia Private Company" App or other program.

## Collection of Other Data

"Other Data" are data that generally do not reveal your specific identity or do not directly relate to an individual. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data. Other Data include:

- Browser and device data
- App usage data
- Data collected through cookies, pixel tags and other technologies
- Demographic data and other data provided by you
- Aggregated data

## How We Collect Other Data

We collect Other Data in a variety of ways:

- **Your browser or device.** We collect certain data through your browser or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services (such as the Apps) you are using. We use this data to ensure that the Online Services function properly.
- **Cookies.**

We collect certain data from cookies, which are pieces of data stored directly on the computer or mobile device that you are using. Cookies allow us to collect data such as browser type, time spent on the Online Services, pages visited, referring URL, language preferences, and other aggregated traffic data. We use the data for security purposes, to facilitate navigation, to display data more effectively, to collect statistical data, to personalize your experience while using the Online Services and to recognize your computer to assist your use of the Online Services. We also gather statistical data about the use of the Online Services to continually improve design and functionality, understand how they are used and assist us with resolving questions.

Cookies further allow us to select which advertisements or offers are most likely to appeal to you and display them while you are using the Online Services or to send marketing emails. We also use cookies to track responses to online advertisements and marketing emails

If you do not want data collected with cookies, you can learn more about controlling cookies at <http://www.allaboutcookies.org/manage-cookies/>

You can choose whether to accept cookies by changing the settings on your browser or by managing your tracking preferences by clicking on "Cookie Settings" located at the bottom of our homepage. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Online Services. For example, we will not be able to recognize your computer, and you will need to log in every time you visit. You also will not receive advertising or other offers from us that are relevant to your interests and needs.

- **Pixel Tags and other similar technologies.** We collect data from pixel tags (also known as web beacons and clear GIFs), which are used with some Online Services to, among other things, track the actions of users of the Online Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Online Services.
- **Analytics.** We collect data through Google Analytics and Adobe Analytics, which use cookies and technologies to collect and analyze data about the use of the Services. These services collect data regarding the use of other websites, apps and online resources. We use Google Analytics and Google AdWords, services which transmit website traffic data to Google servers. Google Analytics does not identify individual users and does not associate your IP address with any other data held by Google. We use reports provided by Google to help us understand website traffic

and webpage usage and optimize advertisements bought from Google's own and other advertising networks. Google may process the data in the manner described in Google's Privacy Policy and for the purposes set out above in this section. You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) and opt out by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

- We also use Yandex Metrika and Yandex Direct services, which collect user- and session parameters via cookies. Information collected by such cookies does not reveal your identity, but it can help us to improve our website performance. Information about your use of this website will be transferred to Yandex and stored on Yandex's servers. Yandex will process this information to assess how you use the website, compile reports for us on our website operation, and provide other services. Yandex processes this information as specified in Yandex Privacy Policy.
- Our website also uses Facebook pixel, which collects anonymized aggregated data that helps us with optimization of ad purchases on Facebook's different platforms (including Instagram). Facebook collects a user id that will allow them to match if a user has visited a site with the Facebook pixel. We as advertisers can however never identify the behavior of a specific user. Facebook and its related platforms are in a closed advertising ecosystem where their users can regulate if they consent to advertisers using data collected from their websites to purchase ads on Facebook.
- **Your IP Address.** We collect your IP address, a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services. We also may derive your approximate location from your IP address.
- **Aggregated Data.** We may aggregate data that we collected and this aggregated data will not personally identify you or any other user.

## Use of Personal Data and Other Data

We use Personal Data and Other Data to provide you with Services, to develop new offerings and to protect the "Kritika Xenodoxeia Private Company" and our guests as detailed below. In some instances, we will request that you provide Personal Data or Other Data to us directly. If you do not provide the data that we request, or prohibit us from collecting such data, we may not be able to provide the requested Services.

We use Personal Data and Other Data for our legitimate business interests, including the following:

- **Provide the Services you request.** We use Personal Data and Other Data to provide Services you request, including:
  - To facilitate reservations, payment, send administrative information, confirmations or pre-arrival messages, to assist you with meetings and events and to provide you with other information about the area and the property at which you are scheduled to visit
  - To complete your reservation and stay, for example, to process your payment, ensure that your room is available and provide you with related customer service
  - To support our electronic receipt program. When you provide an email address in making a reservation, we use that email address to send you a copy of your bill. If you make a reservation for another person using your email address, that person's bill will be emailed to you, as well. You can opt out of receiving your bill via email and instead receive a paper copy by contacting the front desk

We will use Personal Data and Other Data to manage our contractual relationship with you, because we have a legitimate interest to do so and/or to comply with a legal obligation.

- **Personalize the Services according to your Personal Preferences.** We use Personal Data and Other Data to personalize the Services and improve your experiences, including when you contact our call center, visit one of our properties or use the Online Services, to:
  - Customize your experience according to your Personal Preferences
  - Present offers tailored to your Personal Preferences

We will use Personal Data and Other Data to provide personalized Services according to your Personal Preferences either with your consent or because we have a legitimate interest to do so.

- **Communicate with you about goods and services according to your Personal Preferences.** We use Personal Data and Other Data to:
  - Send you marketing communications and promotional offers, as well as periodic customer satisfaction, market research or quality assurance surveys

We will use Personal Data and Other Data to communicate with you with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.

- **Loyalty Programs.** We use Personal Data and Other Data to:
  - Offer and manage your participation in our global loyalty programs, as well as others that are specific to certain properties or tailored to your interests
  - Send you offers, promotions and information about your account status and activities
  - Assess your benefits
  - Administer points earned through co-branded credit cards
  - Manage your choices regarding how you wish to earn, track and use your points

We will use Personal Data and Other Data in this way with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.

- **Sweepstakes, activities, events and promotions.** We use Personal Data and Other Data to allow you to participate in sweepstakes, contests and other promotions and to administer these activities. Some of these activities have additional rules and may contain additional information about how we use and disclose your Personal Data. We suggest that you read any such rules carefully.

We use Personal Data and Other Data in this way with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.

- **Business Purposes.** We use Personal Data and Other Data for data analysis, audits, security and fraud monitoring and prevention (including with the use of closed-circuit television, card keys, and other security systems), developing new goods and services, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

We use Personal Data and Other Data in this way to manage our contractual relationship with you, comply with a legal obligation and/or because we have a legitimate interest to do so.

## Disclosure of Personal Data and Other Data

Our goal is to provide you with the highest level of hospitality and Services, and to do so, we share Personal Data and Other Data with the following:

- **"Kritika Xenodoxeia Private Company".** We disclose Personal Data and Other Data to other companies within the "Kritika Xenodoxeia Private Company" for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you, facilitating the loyalty programs, and to accomplish our business purposes. "Kritika Xenodoxeia Private Company" is the party responsible for the management of the jointly-used Personal Data. We share your Personal Data and Other Data used for making a reservation with the applicable property to fulfill and complete your reservation.
- **Strategic Business Partners.** We disclose Personal Data and Other Data with select Strategic Business Partners who provide goods, services and offers that enhance your experience at our properties or that we believe will be of interest to you. By sharing data with these Strategic Business Partners, we are able to make personalized services and unique travel experiences available to you. For example, this sharing enables spa, restaurant, health club, concierge and other outlets at our properties to provide you with services. This sharing also enables us to provide you with a single source for purchasing packages that include travel-related services, such as airline tickets, rental cars and vacation packages.
- **Service Providers.** We disclose Personal Data and Other Data to third-party service providers for the purposes described in this Privacy Statement. Examples of service providers include companies that provide website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing and other services.
- **Corporate Reorganization.** We may disclose or transfer your Personal Data and Other Data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the "Kritika Xenodoxeia Private Company" business, assets or stock (including any bankruptcy or similar proceedings).

## Other Uses and Disclosures

We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of the "Kritika Xenodoxeia Private Company", you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose Other Data for any purpose, except where we are not allowed to under applicable law. In some instances, we may combine Other Data with Personal Data (such as combining your name with your location). If we do, we will treat the combined data as Personal Data as long as it is combined.

## **Non- "Kritika Xenodoxeia Private Company" Entities**

This Privacy Statement does not address, and we are not responsible for the privacy, data or other practices of any entities outside of the "Kritika Xenodoxeia Private Company", including Franchisees, Owners, Authorized Licensees, Strategic Business Partners or any third party operating any site or service to which the Services link, payment service, loyalty program, or website that is the landing page of the high-speed Internet providers at our properties. The inclusion of a link on the Online Services does not imply endorsement of the linked site or service by us. We have no control over, and are not responsible for, any third party's collection, use and disclosure of your Personal Data.

In addition, we are not responsible for the data collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Data you disclose to other organizations through or the Apps or our Social Media Pages.

## **Third Party Advertisers**

We may use third-party advertising companies to serve advertisements regarding goods and services that may interest you when you access and use the Online Services, other websites or online services. To serve such advertisements, these companies place or recognize a unique cookie on your browser (including through the use of pixel tags).

## **Security**

We seek to use reasonable organizational, technical and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "Contacting Us" section, below.

## **LINKS TO OTHER WEB SITES**

In order to anticipate your needs, our website provides links to other web sites and third parties for your convenience and information. We are not responsible for the collection, use, maintenance, sharing or disclosure of data (including personal data) by such third parties. We encourage you to contact these third parties to ask questions about their privacy practices, policies and security measures before disclosing any personal data. We recommend that you review the privacy statements and policies of linked web sites to understand how those web sites collect, use and store information.

## **Choices, Access and Retention**

You have choices when it comes to how we use your data and we want to ensure you have the information to make the choices that are right for you.

If you no longer want to receive marketing-related emails, you may opt out by following the instructions in any such email you receive from us

In addition, members of our loyalty programs can opt out from marketing-related emails through their program account, or by sending a letter to: Kritika Xenodoxeia Private Company (Pepper Sea Club Hotel), Kavros Apokoronou, 73007, Chania, Crete, Greece

We will try to comply with your request as soon as reasonably practicable. If you opt out of receiving marketing emails from us, we may still send you important administrative messages, from which you cannot opt out.

**Special Notice for California Residents:** Customers who reside in California and have provided their Personal Data to us can request, once per calendar year, information about our sharing of certain categories of Personal Data to third parties and within the "Kritika Xenodoxeia Private Company", for their direct marketing purposes. Such requests should be submitted to us at [info@pepperhotel.gr](mailto:info@pepperhotel.gr) or:

Kritika Xenodoxeia Private Company (Pepper Sea Club Hotel), Kavros Apokoronou, 73007, Chania, Crete, Greece

We will provide a list of the categories of Personal Data disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

## How You Can Access, Change or Suppress Your Personal Data

If you would like to review, correct, update, suppress, restrict or delete Personal Data that you have previously provided to us, or if you would like to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by law), you can contact us at [info@pepperhotel.gr](mailto:info@pepperhotel.gr) or by mail:

Kritika Xenodoxeia Private Company (Pepper Sea Club Hotel), Kavros Apokoronou, 73007, Chania, Crete, Greece

In your request, please make clear what Personal Data you would like to have changed, whether you would like to have your Personal Data suppressed from our database, or other limitations you would like to put on our use of your Personal Data. For your protection, we only fulfill requests for the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before fulfilling your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we often need to retain certain data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or reservation, or enter a promotion, you may not be able to change or delete the Personal Data provided until after the completion of such purchase, reservation, or promotion). There may also be residual data that will remain within our databases and other records, which will not be removed. In addition, there may be certain data that we may not allow you to review for legal, security or other reasons.

## Retention

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services)
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations)

## Sensitive Data

Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any Sensitive Personal Data (e.g., social security numbers, national identification number, data related to racial or ethnic origin, political opinions, religion, ideological or other beliefs, health, biometrics or genetic characteristics, criminal background, trade union membership, or administrative or criminal proceedings and sanctions).

## Cross-Border Transfer

The "Kritika Xenodoxeia Private Company" is a global organization and provides a global service. Sharing data cross-border is essential to the Services so that you receive the same high-quality service wherever you are in the world. As a result, we will, subject to law, transfer Personal Data and Other Data collected in connection with the Services, to entities in countries where data protection standards may differ from those in the country where you reside. By making a reservation, visiting or staying at a "Kritika Xenodoxeia Private Company" branded property or using any "Kritika Xenodoxeia Private Company" branded service, you understand that we transfer your Personal Data globally.

In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries will be entitled to access your Personal Data.

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA

## Updates to This Privacy Statement

The "LAST UPDATED" legend at the top of this page indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on the Online Services. Your use of the Services following these changes means that you accept the revised Privacy Statement. If you would like to review the version of the Privacy Statement that was effective immediately prior to this revision, please contact us at [info@pepperhotel.gr](mailto:info@pepperhotel.gr)

## Privacy Preferences

At "Kritika Xenodoxeia Private Company", we respect your privacy and want to provide you with information and choices. The options provided below allow you to express your preferences: what and how much you share with us and when and how you hear from us.

## Cookie Preferences

We want to learn what is relevant to you and ensure you have a personalized experience. As described earlier, we use digital tools like cookies and tags on our web pages. Cookies also help us provide, protect and improve our services.

To adjust your preferences, please visit our Cookie Settings page.

## Marketing Preferences

We want to engage with you in a way that is meaningful to you. We recognize that you may only want to hear from us in a limited way.

You may choose to unsubscribe from our newsletters by clicking the link at the bottom of one of our communications

\*Please note that even if you choose to opt-out of communications with us, we will continue to send you transactional messages about your specific reservation or stay with us, such as pre-arrival, confirmation and guest satisfaction surveys.

## Use of Personal Data

If we intend to use your Personal Data for a purpose that is materially different from these purposes or if we intend to disclose it to a third party not previously identified, we will notify you and offer you the opportunity to opt-out of such uses and/or disclosures where it involves Personal Data or opt-in where Sensitive Personal Data is involved.

## Disclosures to Service Providers

We sometimes contract with other companies and individuals to perform functions or services on our behalf such as spas and restaurants within our hotels, website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing and other services. They may have access to Personal Data needed to perform their functions but are restricted from using the Personal Data for purposes other than providing services for us or to us. "Kritika Xenodoxeia Private Company" requires that its Service Providers that have access to Personal Data received from the EEA and Switzerland provide the same level of protection as required by the Privacy Shield Principles. We are responsible for ensuring that our Service Providers process the Personal Data in a manner consistent with our obligations under the Principles.

## Data Security

We use reasonable physical, electronic, and administrative safeguards to protect your Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the nature of the Personal Data and the risks involved in processing that information.

## Data Integrity and Purpose Limitation

We limit the collection and use of Personal Data to the information that is relevant for the purposes of processing and will not process Personal Data in a way that is incompatible with the purposes for which the information has been collected or subsequently authorized by you. We take reasonable steps to ensure the Personal Data is reliable for its intended use, accurate, complete, and current to the extent necessary for the purposes for which we use the Personal Data.

## **Access to Personal Data**

You can ask to review, correct, or delete Personal Data that we maintain about you by sending a written request to [info@pepperhotel.gr](mailto:info@pepperhotel.gr)

## **Contacting Us**

Kritika Xenodoxeia Private Company, Kavros Apokoronou, 73007, Chania, Crete, Greece

Pepper Sea Club Hotel  
Kournas Beach - 73 007, Chania, Crete, Greece  
Tel: +30 28250 61739  
Email: [info@pepperhotel.gr](mailto:info@pepperhotel.gr)

## **Privacy Policy Changes**

This Policy may be changed from time to time, consistent with the requirements of the Privacy Shield. You can determine when this Policy was last revised by referring to the "LAST UPDATED" legend at the top of this page. Any changes to our Policy will become effective upon our posting of the revised Policy on the Site.