

# PRIVACY POLICY

---

We are very delighted that you have shown interest in our enterprise. Data protection is of a particularly high priority for the management of the Hotel Post Zermatt AG. The use of the Internet pages of the Hotel Post Zermatt AG is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to the Hotel Post Zermatt AG. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, the Hotel Post Zermatt AG has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

## A. Definitions

---

The data protection declaration of the Hotel Post Zermatt AG is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

### 1. Personal data

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### 2. Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

### 3. Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 4. Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

## **5. Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

## **6. Pseudonymization**

Pseudonymization is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

## **7. Controller or controller responsible for the processing**

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

## **8. Processor**

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## **9. Recipient**

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

## **10. Third party**

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## **11. Consent**

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

# **B. Data collection on our website**

---

## **12. Visiting our website**

The website of the Hotel Post Zermatt AG collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. As part of hosting on the servers, the IP address of our website visitors is processed and stored for up to 7 days in the web server logs for error analysis and security of the web services. There is no further processing. The logs are excluded from the backup.

Collected data may be:

- IP-address of the contacting computer,
- Internet service provider of the accessing system (usually your Internet-Access-Provider),
- Date and time of access to the Internet site,

- Referral URL from which an accessing system reaches our website
- Name and URL of the opened file (sub-websites),
- Status-code (i.e. error messages),
- Operating system used by the accessing system,
- Browser used (type, version and language),
- Transmission data such as HTTP/1.1
- In case your username if you have registered elsewhere to get through to our page.

When using these general data and information, the Hotel Post Zermatt AG does not draw any conclusions about the data subject. Rather, this information is needed to deliver the content of our website correctly, optimize the content of our website as well as its advertisement, ensure the long-term viability of our information technology systems and website technology, and provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, the Hotel Post Zermatt AG analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

### **13. Bookings, newsletter or contact form**

On our website you have the possibility to make bookings, to register for the newsletter or to contact us via contact form. This is data which we consider particularly worthy of protection. All these data are therefore encrypted.

We will collect the data entered on the form, including the contact details you provide, to answer your question and any follow-up questions. We do not share this information without your permission. We will, therefore, process any data you enter onto the contact form only with your consent per Article 6 para 1 letter a GDPR. You may revoke your consent at any time. An informal email making this request is sufficient. The data processed before we receive your request may still be legally processed.

#### **a. Booking via website, by phone or email**

If you make a booking for overnight stays, restaurant reservations and/or voucher purchases via our websites, by correspondence (email or letter post) or by telephone, we usually need the following data for the execution of the respective contract:

- Salutation
- First and Last Name
- postal address
- Phone Number
- Language
- Credit card details
- e-mail address

Other details such as your expected arrival time are optional. These are processed within the scope of the above and other legal references.

#### **b. Newsletter-Tracking**

On the website of the Hotel Post Zermatt AG, users are given the opportunity to subscribe to our enterprise's newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

The Hotel Post Zermatt AG informs its customers and business partners regularly by means of a newsletter about enterprise offers. The enterprise's newsletter may only be received by the data subject if

- the data subject has a valid e-mail address
- the data subject registers for the newsletter shipping

A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for newsletter shipping, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for shipping the newsletter, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website of the controller, or to communicate this to the controller in a different way.

### c. Using our contact form

The website of the Hotel Post Zermatt AG contains information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

The email addresses of the contact requestors are stored in the mail server logs for up to 7 days for error analysis and ensuring the functionality of the email services. There is no further processing. The logs are excluded from the backup.

The scope of the data provided to us is entirely up to you by filling in or leaving out the fields in the contact forms. In order to meet the requirement of data economy, i.e. to collect only those data which are necessary for the respective purpose, we rarely use so-called "mandatory fields". These only concern information that is necessary for us to contact you or for the orderly completion of your order, e.g. your e-mail address, number of travellers for reservations.

The data entered by you in the contact forms will be used exclusively for the purpose defined by you or the contact form. Your data will be stored by us in the CMS on the servers of Rebagdata AG „Protel“, Einsiedlerstrasse 533, 8810 Horgen, Switzerland, for a maximum of 1 year. You can request the access, correction and / or deletion of your data at any time. Please contact our data security officer: [info@hotelpost.ch](mailto:info@hotelpost.ch).

## 14. Cookies

The Internet pages of the Hotel Post Zermatt AG use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, the Hotel Post Zermatt AG can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers.

- [Microsofts Windows Internet Explorer](#)
- [Microsofts Windows Internet Explorer Mobile](#)
- [Mozilla Firefox](#)
- [Google Chrome für Desktop](#)
- [Google Chrome für Mobile](#)
- [Apple Safari für Desktop](#)
- [Apple Safari für Mobile](#)

If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

## 15. Tracking-Tools

### a. General information

We and our third-party service providers use cookies, pixels, web beacons, tracking tools and other similar technologies on our websites, mobile applications and in other areas of our business to collect information and provide you with the services that you have requested or participate in and to provide targeted advertising. Subject to local consent requirements, we may use this and other information we collect, such as a hashed email address, to help us and our third-party service providers identify other devices that you use (e.g., a mobile phone, tablet, other computer, etc.). We, and our third party service providers, also may use the cross-device tracking and other information we learn about you to serve targeted advertising on your devices. We also use the information that we collect to improve our products and services as well as your experience when visiting our websites and using our mobile applications. For more information on these subjects, please click the relevant section below.

- Navigation path used to reach our website
- Time spent on our website
- Last sub-page visited before leaving our website
- Country, Region or city, from where the website was accessed
- Type of device used to access our website
- Returned or first visit

### b. Data protection provisions about the application and use of Facebook

On this website, the controller has integrated components of the enterprise Facebook. Facebook is a social network.

A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information. Facebook allows social network users to include the creation of private profiles, upload photos, and network through friend requests.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. If a person lives outside of the United States or Canada, the controller is the Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet website, which is operated by the controller and into which a Facebook component (Facebook plug-ins) was integrated, the web browser on the information technology system of the data subject is automatically prompted to download display of the corresponding Facebook component from Facebook through the Facebook component. An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugins/>. During the course of this technical procedure, Facebook is made aware of what specific sub-site of our website was visited by the data subject.

If the data subject is logged in at the same time on Facebook, Facebook detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-site of our Internet page was visited by the data subject. This information is collected through the Facebook component and associated with the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated into our website, e.g. the "Like" button, or if the data subject submits a comment, then Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data.

Facebook always receives, through the Facebook component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook during the time of the call-up to our website. This occurs regardless of whether the data subject clicks on the Facebook component or not. If such a transmission of information to Facebook is not desirable for the data subject, then he or she may prevent this by logging off from their Facebook account before a call-up to our website is made.

The data protection guideline published by Facebook, which is available at <https://facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. In addition, it is explained there what setting options Facebook offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook. These applications may be used by the data subject to eliminate a data transmission to Facebook.

### c. Data protection provisions about the application and use of Instagram

On this website, the controller has integrated components of the service Instagram. Instagram is a service that may be qualified as an audio-visual platform, which allows users to share photos and videos, as well as disseminate such data in other social networks.

The operating company of the services offered by Instagram is Instagram LLC, 1 Hacker Way, Building 14 First Floor, Menlo Park, CA, UNITED STATES.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which an Instagram component (Insta button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding Instagram component of Instagram. During the course of this technical procedure, Instagram becomes aware of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in at the same time on Instagram, Instagram detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Instagram component and is associated with the respective Instagram account of the data subject. If the data subject clicks on one of the Instagram buttons integrated on our website, then Instagram matches this information with the personal Instagram user account of the data subject and stores the personal data.

Instagram receives information via the Instagram component that the data subject has visited our website provided that the data subject is logged in at Instagram at the time of the call to our website. This occurs regardless of whether the person clicks on the Instagram button or not. If such a transmission of information to Instagram is not desirable for the data subject, then he or she can prevent this by logging off from their Instagram account before a call-up to our website is made.

Further information and the applicable data protection provisions of Instagram may be retrieved under <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

#### **d. Data protection provisions about the application and use of Google AdSense**

On this website, the controller has integrated Google AdSense. Google AdSense is an online service which allows the placement of advertising on third-party sites. Google AdSense is based on an algorithm that selects advertisements displayed on third-party sites to match with the content of the respective third-party site. Google AdSense allows an interest-based targeting of the Internet user, which is implemented by means of generating individual user profiles.

The operating company of Google's AdSense component is Alphabet Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

The purpose of Google's AdSense component is the integration of advertisements on our website. Google AdSense places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Alphabet Inc. is enabled to analyse the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google AdSense component is integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google AdSense component for the purpose of online advertising and the settlement of commissions to Alphabet Inc. During the course of this technical procedure, the enterprise Alphabet Inc. gains knowledge of personal data, such as the IP address of the data subject, which serves Alphabet Inc., inter alia, to understand the origin of visitors and clicks and subsequently create commission settlements.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Alphabet Inc. from setting a cookie on the information technology system of the data subject. Additionally, cookies already in use by Alphabet Inc. may be deleted at any time via a web browser or other software programs.

Furthermore, Google AdSense also uses so-called tracking pixels. A tracking pixel is a miniature graphic that is embedded in web pages to enable a log file recording and a log file analysis through which a statistical analysis may be performed. Based on the embedded tracking pixels, Alphabet Inc. is able to determine if and when a website was opened by a data subject, and which links were clicked on by the data subject. Tracking pixels serve, inter alia, to analyse the flow of visitors on a website.

Through Google AdSense, personal data and information—which also includes the IP address, and is necessary for the collection and accounting of the displayed advertisements—is transmitted to Alphabet Inc. in the United States of America. These personal data will be stored and processed in the United States of America. The Alphabet Inc. may disclose the collected personal data through this technical procedure to third parties.

Google AdSense is further explained under the following link

<https://www.google.com/intl/en/adsense/start/>.

#### **e. Data protection provisions about the application and use of Google Analytics**

On this website, the controller has integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behaviour of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

For the web analytics through Google Analytics the controller uses the application "\_gat.\_anonymizeIp". By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymised when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports,

which show the activities on our websites, and to provide other services concerning the use of our Internet site for us.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyse the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. With each visit to our Internet site, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs. In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

#### **f. Data protection provisions about the application and use of Google +1**

On this website, the controller has integrated the Google+ button as a component. Google+ is a so-called social network. A social network is a social meeting place on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information. Google+ allows users of the social network to include the creation of private profiles, upload photos and network through friend requests.

The operating company of Google+ is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

With each call-up to one of the individual pages of this website, which is operated by the controller and on which a Google+ button has been integrated, the Internet browser on the information technology system of the data subject automatically downloads a display of the corresponding Google+ button of Google through the respective Google+ button component. During the course of this technical procedure, Google is made aware of what specific sub-page of our website was visited by the data subject. More detailed information about Google+ is available under <https://developers.google.com/+/>.

If the data subject is logged in at the same time to Google+, Google recognizes with each call-up to our website by the data subject and for the entire duration of his or her stay on our Internet site, which specific sub-pages of our Internet page were visited by the data subject. This information is collected through the Google+ button and Google matches this with the respective Google+ account associated with the data subject.

If the data subject clicks on the Google+ button integrated on our website and thus gives a Google+ 1 recommendation, then Google assigns this information to the personal Google+ user account of the data subject and stores the personal data. Google stores the Google+ 1 recommendation of the data subject, making it publicly available in accordance with the terms and conditions accepted by the data subject in this regard. Subsequently, a Google+ 1 recommendation given by the data subject on this website together with other personal data, such as the Google+ account name used by the data subject and the stored photo, is stored and processed on other Google services, such as search-engine results of the Google search engine, the Google account of the data subject or in other places, e.g. on Internet pages, or in relation to advertisements. Google is also able to link the visit to this website with other personal data stored on Google. Google further records this personal information with the purpose of improving or optimizing the various Google services.

Through the Google+ button, Google receives information that the data subject visited our website, if the data subject at the time of the call-up to our website is logged in to Google+. This occurs regardless of whether the data subject clicks or doesn't click on the Google+ button.

If the data subject does not wish to transmit personal data to Google, he or she may prevent such transmission by logging out of his Google+ account before calling up our website.

Further information and the data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/>. More references from Google about the Google+ 1 button may be obtained under <https://developers.google.com/+/web/buttons-policy>.

## B. Data processing

---

### 16. Legal basis for the processing

Article 6 para 1 letter a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6 para 1 letter b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Article 6 para 1 letter c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Article 6 para 1 letter d GDPR. Finally, processing operations could be based on Article 6 para 1 letter f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

#### **17. Data transmitted when entering into a contract with online shops, retailers and mail order**

We transmit personally identifiable data to third parties only to the extent required to fulfil the terms of your contract (for example for transfers, restaurant reservations, spa appointments etc.) or banks entrusted to process your payments. Your data will not be transmitted for any other purpose unless you have given your express permission to do so. Your data will not be disclosed to third parties for advertising purposes without your express consent.

The basis for data processing is Art. 6 para 1 letter b GDPR, which allows the processing of data to fulfil the hospitality contract or for measures preliminary to a contract.

## **C. Speicherung und Austausch von Daten mit Dritten**

---

#### **18. SSL or TLS encryption**

This site uses SSL or TLS encryption for security reasons and for the protection of the transmission of confidential content, such as the inquiries you send to us as the site operator. You can recognize an encrypted connection in your browser's address line when it changes from "http://" to "https://" and the lock icon is displayed in your browser's address bar. If SSL or TLS encryption is activated, the data you transfer to us cannot be read by third parties.

#### **19. Encrypted payments on this website**

If you enter into a contract which requires you to send us your payment information (e.g. account number for direct debits), we will require this data to process your payment.

Payment transactions using common means of payment (Visa/MasterCard, direct debit) are only made via encrypted SSL or TLS connections. You can recognize an encrypted connection in your browser's address line when it changes from "http://" to "https://" and the lock icon in your browser line is visible.

In the case of encrypted communication, any payment details you submit to us cannot be read by third parties.

#### **20. Booking platforms**

If you book via a third-party platform, we receive various personal information from the relevant platform operator (e.g. if you book a room via the external platforms "booking.com" and "Expedia"). This is generally the data listed in no. 5 of this privacy statement. Any requests concerning your booking are also forwarded to us. In particular, we will process the data to enter your booking as required and to provide the booked services. The legal basis for processing the data for this purpose is the performance of a contract in accordance with Article 6 para 1 letter b GDPR.

Finally, we may be informed by the platform operators about disputes in connection with a booking. If so, we may also receive data concerning the booking process in some cases, which may include a copy of the booking confirmation to serve as evidence of the booking actually being completed. We process this data to safeguard and enforce our claims. This is the basis for our legitimate interest within the meaning of Article 6 para 1 letter f GDPR.

Please also observe the privacy information of the relevant provider.

## **21. Processing data in connection with our CRM system**

The personal data mentioned in the sections above is stored centrally in our CRM system. The data in the central CRM system is processed by us to manage the customer relationship, in particular to offer you personalized services and products. The legal basis for data processing as part of customer management is the processing of the contract within the meaning of Article 6 para 1 letter b GDPR.

## **22. Storage of data**

We store personal information only as long as necessary to use the above tracking, advertising, and analysis services within the scope of our legitimate interests; to perform, to the extent specified above, services that you have requested or to which you have given your consent; to comply with our legal obligations. Contract data is kept longer by us, as this is required by statutory retention requirements. Retention requirements that oblige us to keep data arise from accounting and tax regulations. According to these regulations, business communication, contracts, and accounting documents must be kept for up to 10 years. As far as we no longer need this data to carry out the services for you, the data will be locked. This means that the data may then only be used for accounting and tax purposes.

## **23. The legitimate interests pursued by the controller or by a third party**

Where the processing of personal data is based on Article 6 para 1 letter f GDPR our legitimate interest is to carry out our business in favour of the well-being of all our employees and the shareholders.

# **D. General information**

---

## **24. Information, blocking, deletion**

As permitted by law, you have the right to be provided at any time with information free of charge about any of your personal data that is stored as well as its origin, the recipient and the purpose for which it has been processed. You also have the right to have this data corrected, blocked or deleted. You can contact us at any time using the address given in our legal notice if you have further questions on the topic of personal data.

## **25. What rights do you have regarding your data?**

You always have the right to request information about your stored data, its origin, its recipients, and the purpose of its collection at no charge. You also have the right to request that it be corrected, blocked, or deleted. You can contact us at any time using the address given in the legal notice if you have further questions about the issue of privacy and data protection. You may also, of course, file a complaint with the competent regulatory authorities.

## **26. Data protection**

The operators of this website take the protection of your personal data very seriously. We treat your personal data as confidential and in accordance with the statutory data protection regulations and this privacy policy.

If you use this website (<https://hotelpost.ch>) various pieces of personal data will be collected. Personal information is any data with which you could be personally identified. This privacy policy explains what information we collect and what we use it for. It also explains how and for what purpose this happens.

Please note that data transmitted via the internet (e.g. via email communication) may be subject to security breaches. Complete protection of your data from third-party access is not possible.

## 27. Note about data transfers to the USA

For the sake of completeness, we would like to point out to users, resident or domiciled in Switzerland that in the USA, there are surveillance measures taken by US authorities, which generally entail the storage of all personal data of all persons whose data was transferred from Switzerland to the USA. This is done without any differentiation, limitation, or exception on the basis of the objective pursued, and without an objective criterion that would limit the US authorities' access to the data and its subsequent use to very specific, strictly limited purposes, which justify access to this data as well as intervention associated with their use. Furthermore, we would like to point out that in the US, there are no legal remedies available for affected Swiss residents that allow them to obtain access to the data concerning them and to demand their rectification or deletion, and that there is no effective legal protection against general legal access rights of US authorities. We explicitly inform the person concerned about this legal and factual situation in order to make a correspondingly informed decision to consent to the use of his data. For users residing in EU Member States, we point out that, from the point of view of the European Union, the US does not have sufficient data protection levels due to, inter alia, the issues mentioned in this section. To the extent that we have explained in this privacy statement that recipients of data (such as Google, Facebook, or Twitter) are based in the US, we will either ensure that your data is protected at a reasonable level by our partners by contractual arrangements with these companies or by securing certification of these companies under the EU-US-Privacy Shield.

## 28. Right to lodge a complaint with a data protection authority

You have the right to lodge a complaint with a data protection authority at any time.

Stand: 02.06.2018

The whole content of these pages is translated from the German language. In any case of a legal action against the HPZ the original German translation will take place. **Alle Datenschutzerklärungen auf dieser Seite wurden aus dem Deutschen übersetzt. Falls ein Rechtsanspruch anfällt, gilt die deutsche Übersetzung.**