Information on the processing of guests- and members' personal data

Data privacy is of utmost importance to Hotel Diplomat, Villa Dagmar, Villa Dahlia & Diplomat Collection, all of mentioned are owned by Hotel Diplomat AB. We strive to be open and transparent about how we handle your personal data. Therefore, we have a policy outlining how your personal data will be processed and protected.

Who is the data controller for your personal data?

Hotel Diplomat, Villa Dagmar, Villa Dahlia & Diplomat Collection are all owned by Hotel Diplomat AB, Strandvägen 7C, 114 56 Stockholm, Sweden. Organization number: 556119-0751, is the data controller for the personal data you provide to us and is responsible for your personal data in accordance with applicable data protection regulations.

Where do we store your data?

The data we collect from you is stored securely for internal use in Hotel Diplomat AB's data systems. This information is necessary to manage your booking and is only accessed by authorized personnel at Hotel Diplomat AB and a few selected partners and suppliers of our systems. Hotel Diplomat AB has implemented appropriate technical and organizational measures to protect your personal data against loss, manipulation, or unauthorized access. We continuously adapt our security measures to the ongoing technological developments.

Information collected from and about you that we process

We only collect personal data that is relevant for the purpose described in the specific terms for each service. The information that may be collected includes, for example, details such as name, address, telephone number, email address, personal identification number, IP address, information to facilitate the use of the services (such as login), preferred language, user history, membership information, information about your travel companions, booking preferences, payment, employment, emergency contacts, special dietary requirements, requests for accessibility, and any other information you provide when using the services. As an example of personal data from companies outside of Hotel Diplomat AB, updated address information and demographic information may be mentioned. Hotel Diplomat AB uses personal data to:

- 1. Administer, provide, develop, and maintain our services.
- 2. Process your bookings, payments, and service orders.

- 3. Contact you via SMS, other mobile applications, or email to notify you of your booking status or information related to your booking before, during, and after your stay.
- 4. Diagnose errors, optimize technology, and be able to contact you in case of problems with a booking or the provision of services.
- 5. Analyze and improve the quality and experience of the services, such as verifying that your user account is not being used by others.
- 6. Personalize communication with you regarding our services, for example, by creating a profile for you and sending offers that match your user profile.
- 7. Analyze statistics and user behavior regarding our services.
- 8. Comply with applicable legislation.
- 9. Enhance your benefit and experience of our services in other ways we believe you would appreciate, or
- 10. Market our services

You have the right to request the deletion of your data at any time; in that case, send an email to <u>unsubscribe@diplomathotel.com</u>.

Who has access to your data?

Your data may be shared within Hotel Diplomat AB. We never forward, sell, or exchange your data for marketing purposes to third parties. Data forwarded to third parties is only used for us to provide our services to you. This means that we do not disclose data that can be linked to you, such as receipts and confirmations of your stay, to third parties without legal basis. Hotel Diplomat AB may disclose personal data to third parties, such as the police or other authorities, if it concerns the investigation of a crime or if Hotel Diplomat AB is otherwise obligated to disclose such information under the law or by government decision.

On what legal basis are the data processed?

Every time we receive your personal data, we inform you whether the provision of personal data is statutory and/or mandatory to enter into a contract, and whether it is mandatory to provide the personal data and any consequences if you choose to do so. It is not a statutory or contractual requirement to provide your personal data to us, and you are not obligated to provide your personal data. However, not providing your personal data may affect our ability to enter into contracts, deliver and provide our products and services to you, and administer the contractual relationship and fulfill our obligations to you.

What are your rights? *Right to access:*

You have the right to request information about the personal data we hold about you at any time. You can contact Hotel Diplomat AB, verify yourself with valid ID, and we will send you your personal data via email.

Right to data portability:

Every time Hotel Diplomat AB processes your personal data automatically with your consent or according to a contract, you have the right to receive a copy of your data in a structured, commonly used, and machine-readable format transferred to you or another party. It only includes the personal data you have provided to us.

Right to rectification:

You have the right to request rectification of your personal data if it is inaccurate, including the right to complete incomplete personal data. If you have a membership, contact Hotel Diplomat AB to see what information we have about you and if you wish to edit your personal data.

Right to erasure:

You have the right to have all personal data processed by Hotel Diplomat AB deleted at any time.

You have the right to unsubscribe from contact and direct marketing:

You have the right to unsubscribe from contact and direct marketing. You can opt out of direct marketing by following the instructions in each marketing communication or on the website.

How can you exercise your rights?

We take data protection very seriously, and therefore, we have dedicated staff to handle your requests regarding your rights as outlined above. You can always contact us at <u>unsubscribe@diplomathotel.com</u>.

Right to lodge a complaint with a supervisory authority:

If you believe that Hotel Diplomat AB is processing your personal data improperly, you can contact us. You also have the right to lodge a complaint with a supervisory authority. We process your personal data for the purpose of delivering and providing our products and services to you as a guest in the best possible way and to fulfill and administer our contract with you.

How long do we retain your data?

We retain your data for 100 days for telephone and email messages and for 12 months for bookings. In case of complaints, your data is stored for two years. If you

are a member of Hotel Diplomat AB, we retain your data for as long as you are an active guest/customer.

Updates on GDPR work:

We work to strengthen your personal privacy and may need to update our GDPR work continuously. The latest version of the work is always available on our website. We will notify you of any significant changes in the work, such as the purpose of using your personal data, the identity of the representative, or your rights. All hotels within the EU are working on the following:

- Identifying and reporting security incidents to the data inspection authority within 72 hours of discovering a breach.
- Being able to present all guest data within 30 days upon request from the guest and providing an easy way for guests to obtain this data—these requests are called Subject Access Requests (SARs).
- Limiting the use of data processors outside the EU or setting up a process to prevent the export of data outside the EU.
- Being able to demonstrate to the data inspection authority that procedures are followed according to GDPR.
- Ensuring contracts with service providers handling information involving data covered by GDPR (applies to most contracts).
- Revising privacy policies.
- Updating consent requests with data subjects so that the use of data is clear and traceable.
- Having knowledge of GDPR to ensure that the processes being handled comply with the law.
- Be able to immediately act upon withdrawal of consent and deletion requests.

Links:

Processing of personal data for hotel and restaurant guests - specific terms.