



Protecting your privacy

Privacy Policy GDPR (General Privacy Protection Data Regulation)

Introduction

- a. The Privacy Policy (referred to as the "Policy") covers and concerns the collection, storage, processing and use of personal data conditions by PAP CORP A.E. (referred to as "Papcorp") during the visit and use of the services and websites (sites) owned by it. Papcorp is the owner, creator and recipient of all the rights of their pages and services, as well as the Editor of the Data that may be declared by you in accordance with Greek law and the legislation on the protection of personal data.
- b. This policy does not in any way cover the legal relationship between visitors / users of the pages and any other services not subject to control, and / or management, and / or ownership of Papcorp.
- c. This Policy applies only to pages owned and operated by Papcorp and does not apply to information collected through any other web site or to practices of other companies that Papcorp does not control/manage.
- d. The pages may include links to other sites not controlled by Papcorp but by third parties (natural or legal persons). Under no circumstances is Papcorp responsible for the terms and conditions for the protection of the Visitors '/ Users' Personal Data, which are adopted and applied by these operators.
- e. Using the Papcorp-owned sites, you consent to the collection and processing of information as outlined in this Policy. You also acknowledge that Papcorp may periodically change, modify, add, remove or update this Policy in any way at its sole discretion without prior notice. Please always read the Policy before using our site so that you are aware of the current version of the Policy in the event of any modifications or updates. Last updated Policy: March 2018.

1. Private Use Guarantee

- a. For your simple browsing of Papcorp (www.papcorp.com & www.paphotels.gr), no personal information is collected.
- b. Personal information is information that identifies you. In addition to any other information you may choose and provide to us, this data may include: your personal information such as your name and surname, date of birth, methods of communication, details of credit cards, including the three-digit security code that appears on the back of your credit card, arrival and departure date, room preferences, and eating habits / preferences.
- c. Papcorp does not collect your personal data unless you have provided it explicitly for a specific purpose (e.g when booking a room, subscribing to receive Newsletter via email, participating in surveys or competitions) and if you have given your consent to their use.
- d. We store and use your personal data only if you give your consent for this and only to the extent necessary, depending on the purpose of the processing and the time required in each case.
We use your personal information to provide the services you request from Papcorp, such as to process: (a) bookings, (b) purchases of package holidays or other transactions.
We also use personal information to provide you with the necessary information about planning sessions or other events to provide their specific account information for administrative purposes.

In addition, we may use the information: (a) to improve the services of our group's hotels so as to provide you with the expected level of hospitality. We also use the details to send you newsletters, to include you in promotions for new bundles of offers and to conduct market research, as well as to participate in contests via email, telephone or mail. If you apply for employment at the Papcorp Group, we use the personal information you provide to process your job request.

2. Sensitive personal data

The term "sensitive personal data" refers to relevant information with racial or ethnic origin, political opinions, religion or other beliefs, health, criminal records or membership of unions. We do not collect generally sensitive personal data unless it is voluntarily offered by you. We may use such data provided by you solely to provide better service to you and meet your particular needs.

3. Storing your data

The data provided by you will be retained / stored by us only for as long as it is required to fulfill the purpose for which you have communicated your data to us and in compliance with the applicable laws.

If you have given us your explicit consent to the use of your personal data for advertising purposes (subscription to the Newsletter), we will use your data for this purpose until you withdraw your consent. You can revoke your consent at any time with effect for the future.

4. Non-disclosure of information

- a. Papcorp complies strictly with the Greek Law on the Record of Personal Data. Any information that may be claimed and collected is not disclosed to third parties and is in no way publicized or exploited by Papcorp.
- b. Papcorp commits not to sell, rent or in any way publish or / and disclose the personal data of visitors / users to any third party.

c. Papcorp may distribute your personal data to third parties only in the following cases.

-Provided you have your explicit consent to the disclosure of your personal data,

- If the transfer of personal data is required by a provision of the Law, a court order or a prosecutor's order and only to the competent authorities.

-In Business Transactions: Since we are developing our business, like in cases where we sell, buy, restructure or reorganize our businesses or assets. In the event of a merger, consolidation, sale, liquidation or transfer of our assets, Papcorp may, in its sole and absolute discretion, transfer, sell or define the range of information it has collected, including without limitation non-personal information and personal information in one or more businesses.

d. Papcorp does not sell, share, disclose, transmit or distribute in any way your personal data to third parties, unless expressly permitted under this Policy. It is possible that personal data may occasionally be transmitted to third parties acting on Papcorp or on its behalf or in connection with Papcorp's activity for further processing in line with the purpose for which data collection was originally intended (eg companies car rental). These third parties have been contractually bound by Papcorp to use personal data only for the above reasons and will not forward personal information to third parties and will not disclose it to third parties unless required by law .

e. In the event that the disclosure of personal data to a third party is necessary for any reason, Papcorp will make every effort, whenever possible, to ensure that the processing of the data is carried out in accordance with the purposes and within the limits which had taken place from the outset.

5. Right of access

a. If access to some of the services and content of the Papcorp web sites requires users to register their personal data, they have the right to be assured that in any case their personal data is always up to date . Furthermore, users have the legitimate right to ask for their correction or deletion. In addition, they may at any time ask to stop contact and communication with them.

b. If you wish to contact us to be informed about the use of your personal information, please contact Papcorp SA, Tsimiski & Salaminos 9, 54626 Thessaloniki or send us an email at paphotels@papcorp.gr or use the contact form you will find on the site. When communicating with us, please provide the name of the electronic page where you provided your data, as well as which specific information you would like to be corrected, modified or deleted. Your requests will be treated promptly and correctly. Requests for deletion of data are subject to all relevant legal and moral provisions regarding reporting, holding or storage obligations imposed on Papcorp.

c. It is clarified that in accordance with applicable laws and regulations, you must send with your request proof of your identity and receive a reply within thirty (30) days of receipt of the request

6. Security and Confidentiality

- a) Access to visitor / user contact information is limited to employees or service providers who reasonably believe they need to know this information to provide products or services to visitors / users or to perform their work.
- b) In order to ensure the security and confidentiality of personal data collected by Papcorp during the electronic connection to the Web site, Papcorp uses data networks protected, inter alia, by industrial firewalls and user codes. As regards the management of personal data, measures have been reasonably designed to protect information from loss, misuse, unauthorized access, disclosure, distortion or destruction (only authorized employees have the right to access personal information and can do so only for authorized business functions). Although we cannot guarantee the exclusion of loss, misuse or distortion of the data, we try to avoid unfortunate circumstances.
- c) To protect your privacy, we inform you not to include sensitive personal data in any emails you send us. Please do not send us your credit card numbers or any sensitive personal information via e-mail.

7. Anonymous Data and "Cookies"

a. The pages can use cookies for the proper operation of their services and their pages. Cookies are small pieces of information stored on a computer in order to identify the corresponding browser during your browsing on websites. Cookies can be used to store items, such as logins and user preferences. Any website may send a cookie to your browser, provided that the browser settings allow it. A browser allows a website to access only cookies sent to you, and not cookies from other sites. The visitor / user may configure his / her browser in such a way that he or she warns the user to use cookies on specific page services or to prevent the acceptance of the use of cookies under any circumstances. If the visitor / user does not wish to use cookies to identify them, they may not have access to these services.

b. Cookies used by us

The cookies we use do not store personal data or personal information that may lead to identification of the person to whom they are concerned and which have been otherwise collected. If you do not wish to collect information through cookies, please configure your internet browser to delete all existing cookies from your computer's hard disk, block all cookies in the future, and receive a warning before saving a cookie.

Google Analytics

This site uses Google Analytics, a web analytics service from Google Inc. ("Google"). Google Analytics uses a special "cookie" format, that is, a text file stored on your computer and allows you to analyze how your website is used by you. The use of this site generated by the cookie is typically passed to a Google server in the U.S. and are stored there. We would like to point out that Google Analytics has expanded to this site to include the "gat._anonymizelp" Code and to ensure IP addressing (IP Masking) is anonymous. Because of the anonymity of IPs on this site, Google has shortened your IP address within the territory of the EU and the Member States of the European Economic Community. Only in exceptional cases is the full IP address transmitted to a Google server in the U.S. and there is its conciliation.

Google uses this information on our behalf to analyze your use of this site in order to compile reports on site activities and provide the site administrator with additional services related to its use and use Internet. The IP address that is transmitted to Google Analytics by your browser is

not combined with other data from Google. You can prevent cookies from being saved by selecting the appropriate setting in your browser software (see Section 5 (c) above). In addition, you may prohibit Google from logging out of and relating to the use of the site by the cookie (including your IP address) and processing this data by uploading and installing the browser plug-in is available at <https://tools.google.com/dlpage/gaoptout?hl=en>.

You can find more information about terms of use and privacy at
<http://www.google.com/analytics/terms/us.html> &
<http://www.google.com/analytics/learn/privacy.html?hl=en> = <http://www.google.com/intl/en/policies/privacy/>

8. Personal Information and Children

- a. Most of the information provided by Papcorp websites is addressed to people aged 18 and over. If, however, minor users visit pages with inappropriate / abusive / immoral material that can not be continuously checked, Papcorp will not be held responsible.
- b. Papcorp will not collect, use, or disclose personal information from minors under the age of 18 without having previously obtained the consent of the parent or guardian. We undertake to provide the guardian with: (i) notice about the specific type of personal data collected by the minor; and (ii) the possibility of opposing further collection, use or storage of such information.
- c. Papcorp does not knowingly collect personal information from minors under the age of 18. If it finds that it has collected any personal information from a minor under 18 without a verifiable parental consent, it will delete the information from its database as soon as possible.
- d. Papcorp complies with child protection legislation and any relevant legal provision.

9. Links to other websites

The stated Policy only applies to Papcorp's websites, excluding websites belonging to any third party. Papcorp can provide links to other websites that may interest our guests. Our concern is to ensure that they are also high-quality websites. However, due to the nature of the World Wide Web, Papcorp cannot guarantee the level of personal data protection of any web site that is associated with this site, nor is it responsible for the content of any other than this web site and this Policy does not apply to any site linked to this and not owned by Papcorp.

10. Applicable law

- a. The management and protection of the personal data of the visitor / user of the services of the pages of Papcorp is subject to the terms of this policy and the relevant provisions of the Greek legislation (Law 2472/1997 with the amendments to Law 3625/2007 and Law 3471 / 2006) on the protection of personal data, as amended and currently in force and supplemented by the decisions of the Chairman of the Personal Data Protection Commission and other relevant legislative acts in this context, any possibility The relevant regulation will be an amendment to the present scope.
- b. In any case, Papcorp reserves the right to modify the terms of this privacy policy within the existing or potentially new legal framework.
- c. The use of the services of the pages implies the full and unconditional acceptance of the terms hereof.
- d. In the event that a visitor / user does not agree with the terms of protection of personal data provided herein, he / she shall not use the services of the pages.
- e. Any provision of these terms found to be in breach of this legal framework or to become invalid shall be automatically void and shall be withdrawn from the present, without in any way undermining the validity of the other terms.
- f. In order to resolve any dispute arising out of the validity and application of this Policy, applicable law shall be governed by Greek law and the courts of Thessaloniki shall be competent in the area.