

# SARATZ

Data protection

Last updated: 26.08.2023/msch

Hotel Saratz, 7504 Pontresina, (hereinafter also referred to as “we”) is the operator of the website [www.saratz.ch](http://www.saratz.ch) (hereinafter referred to as “technology”), and thus responsible for the collection, processing, and use of your personal data.

Your trust is important to us, so we take the topic of data protection seriously and ensure it, we train our employees.

Please read the following privacy policy carefully before proceeding. Persons who access the website [www.saratz.ch](http://www.saratz.ch) declare their agreement to the following conditions.

Responsible body for data protection:

Hotel Saratz AG

Via da la Staziun 2

CH-7504 Pontresina

E-Mail: [direktion@saratz.ch](mailto:direktion@saratz.ch)

The address of our data protection representative in the EU is:

Herrn Sven Meyzis, IT.DS Beratung

Klecker Weg 14 a

21244 Buchholz i.d.N., Deutschland

## 1. Scope and purpose of the collection, processing, and use of personal data

### 1.1. General

All personal data collected during the registration or generated during use and protected by the DSG (Schweizer Bundesgesetz über den Datenschutz) or the DSGVO (Datenschutz-Grundverordnung der Europäischen Union 2016/679) will be used exclusively for the purpose of fulfilling the contract, unless, in particular, according to this privacy policy, your express consent to any further use exists or applicable law allows this.

We may collect personal data about received services, your payment details, your online preferences, and your customer feedback, including your company name, your name, address, email, and so on. We use this personal information to communicate with you, to conclude business with you and process transactions, to operate the technology, for billing purposes, to conduct market research as well as for marketing purposes, e.g. to analyse our customer base or to contact you by mail, email, or text messages.

We may collect personal information about your credit standing to protect us against payment default. Furthermore, your browsing and usage data will be collected. This includes, for example, the IP address, the information with which device, browser and browser version you visited the technology; when you accessed it, which operating system you use, from which website or app you have accessed our technology via a link, and what elements of the technology you use. This personal information is stored together with the IP address of your access device. The purpose is to represent and optimise our technology accurately, to protect against attacks or other violations, and to personalise the technology for you.

### 1.2. Technology in use

When visiting our website, our servers temporarily store every access in a log file. The following user and device data, as well as personal data, are collected without your intervention and stored by our host (ISP - Internet Service Provider):

- the IP address of the requesting computer

# PONTRESINA

## SARATZ

- the date and time of access
  - the name and URL of the retrieved file
  - the website from which the access was made
  - the operating system of your computer and the browser you use
- the country from which you accessed and the language settings in your browser

The collection and processing of this data is for the purpose of enabling the use of our website (connection establishment), to ensure the long-term security and stability of the system and to optimise our website and for internal statistical purposes. This is our legitimate interest in data processing.

The IP address is used in particular to record the country of residence of the website visitor. Furthermore, in case of attacks on the network infrastructure of [www.saratz.ch](http://www.saratz.ch), the IP address evaluated for statistical purposes. This is our legitimate interest in processing the data.

### 1.3. When using our contact forms

You have the option to use a contact form to contact us. The entry of the following personal data is mandatory:

- Title
- First and Last Name
- Firma und ggf. Position
- Address (street, house number, city, zip code)
- Phone number
- email address
- Date of birth
- If applicable, other specific data from the form enquiry that are required to process your enquiry/request.
- if applicable, specific data on fellow travellers/groups
- If applicable, information on your means of payment

The mandatory entries are marked by (\*). Failure to provide this information may hinder the provision of our services. The specification of personal data in other fields is voluntary. You can inform us at any time that you no longer consent to the processing of this voluntarily provided personal data (see heading “Your Rights”). Other information is optional and does not affect the use of our technology.

We only use this data to answer your contact request in the best possible and personalised way. The processing of this data is therefore necessary for the implementation of pre-contractual measures or is in our legitimate interest. You can inform us at any time that you no longer consent to the processing of this voluntarily provided personal data (see heading “Your Rights”).

### 1.4. When registering for our newsletter

#### a. Registration

You have the option to subscribe to our newsletter on our website. This requires a registration. As part of the registration, the following data must be provided:

- email address
- First and Last Name

The email address is necessary for sending the newsletter. You can voluntarily fill in your title and name so that we can address you personally with our offer. By registering, you give us

## PONTRESINA

## SARATZ

your consent to the processing of the specified data for the regular distribution of the newsletter to the address specified by you and for the statistical evaluation of the user behaviour and the optimisation of the newsletter. We are entitled to commission third parties with the technical handling of advertising measures and to pass on your data for this purpose. At the end of each newsletter, you will find a link where you can unsubscribe at any time. After the cancellation, your personal data will be deleted. We expressly point to the data analysis conducted in the context of the newsletter dispatch (see section below "Processing of data resulting from newsletter use").

### b. Evaluation

We use third-party email marketing services to send our newsletter. Our newsletter may therefore contain a so-called web beacon (tracking pixel) or similar technical means. A web beacon is a 1x1 pixel, invisible graphic that is associated with the user ID of the respective newsletter subscriber. This pixel is only activated when you view the newsletter images. The recourse to corresponding services makes it possible to evaluate whether the e-mails containing our newsletter have been opened. In addition, it can also be used to record and evaluate the click behaviour of newsletter recipients. We use this data for statistical purposes and to optimise the newsletter in terms of content and structure. This enables us to better tailor the information and offers in our newsletter to the interests of our readers. The tracking pixel is deleted when you delete the newsletter. To prevent tracking pixels in our newsletter, please set your mail programme so that no HTML is displayed in messages.

### 1.5. Bookings via our technology, by correspondence or by telephone

If you make bookings either via our technology, by correspondence (e-mail or letter post) or by telephone call, we require the following mandatory data for the processing of the contract:

- title
- First and Last Name
- Mail address
- Date of birth
- Telephone number
- language
- CC details
- E-Mail-address

We will only use this data and other information voluntarily provided by you (e.g. expected arrival time, motor vehicle registration plate, preferences, comments) to process the contract, unless otherwise stated in this data protection declaration or you have given your separate consent. We will process the data by name in order to record your booking as requested, to provide the booked services, to contact you in the event of any uncertainties or problems and to ensure correct payment. The legal basis of data processing for this purpose is the fulfilment of a contract.

### 1.6. Use of your data for advertising purposes

#### a. Creation of pseudonymized usage profiles

In order to provide you with personalised services and information on our technology (on-site targeting), we use and analyse the data that we collect about you when you visit the website. So-called cookies may also be used in the corresponding processing (see section 1.7 below). The usage data is only merged with pseudonymised data, but never with non-pseudonymised personal data. To enable personalised marketing in social networks, we use so-called remarketing pixels on the technology. If you have an account with a social network involved in this and are logged in at the time of the page visit, this pixel links the page visit with your account. You can make additional settings for advertising in the respective social networks in your user profile.

## PONTRESINA

## SARATZ

### b. Retargeting

We use re-targeting technologies. Your user behaviour will be analysed on our technology, in order to be able to offer you personalised advertisements on partner websites. Your user behaviour is recorded under a pseudonym. Most re-targeting technologies use cookies. (please see below 1.7 "Cookies"). You can prevent re-targeting at any time by rejecting or disabling cookies in the menu bar of your web browser. You can also visit the Digital Advertising Alliance website at [optout.aboutads.info](http://optout.aboutads.info) to apply for an opt-out for the other advertising and re-targeting tools mentioned.

### c. Remarketing and retargeting technologies in use

The following remarketing pixels are used on our technology::

#### Facebook Pixel

On our technology, we use the Remarketing Pixel from Facebook, a service of Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA ("Facebook"). If you have a Facebook account and are logged in at the time of visiting the site, this pixel links the site visit to your account. The data generated in this way is transmitted to Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA and processed there. In this way, the behaviour of page visitors can be tracked after they have been redirected to the provider's website by clicking on a Facebook ad. This allows the effectiveness of the Facebook ads to be evaluated for statistical and market research purposes and future advertising measures to be optimised.

The data collected is anonymous for us as the operator of this website, we cannot draw any conclusions about the identity of the users. However, the data is stored and processed by Facebook so that a connection to the respective user profile is possible and Facebook can use the data for its own advertising purposes in accordance with the Facebook data usage policy. This enables Facebook to display advertisements on Facebook pages as well as outside of Facebook. This use of the data cannot be influenced by us as the site operator. You can find further information on protecting your privacy in Facebook's privacy policy: [www.facebook.com/about/privacy/](http://www.facebook.com/about/privacy/). You can also deactivate the "Custom Audiences" remarketing function in the settings section for advertisements at [www.facebook.com/ads/preferences/?duct=ad\\_settings\\_screen](http://www.facebook.com/ads/preferences/?duct=ad_settings_screen). To do this, you must be logged in to Facebook.

#### Twitter Pixel – X Pixel

We use the remarketing pixel of Twitter/X on our technology, a service of Twitter/X Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA ("Twitter/X"). If you have a Twitter/X account and are logged in at the time of your visit to the site, this pixel links your visit to the site with your account. You can change your privacy settings on Twitter/X in the account settings at [twitter.com/account/settings](https://twitter.com/account/settings). For more information, see Twitter/X's privacy policy at [twitter.com/privacy](https://twitter.com/privacy).

#### Google AdWords and Google Doubleclick

We use Google AdWords and Google Doubleclick, two services of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (registration number: 368047) ("Google"), to serve ads based on the use of previously visited websites.

Google uses the so-called DoubleClick cookie for this purpose, which enables your browser to be recognised when visiting other websites. The information generated by the cookie about your visit to this technology (including your IP address) will be transmitted to and stored by Google on servers in the United States (for more information about transfers of personal data to the United States, see section 4.3 "Transfer of personal data abroad" below).

## PONTRESINA

## SARATZ

Google will use this information for the purpose of evaluating your use of the technology with regard to the advertisements to be placed, compiling reports on website activity and advertisements for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. However, according to Google, your IP address will not be associated with any other data held by Google.

Further information on Google AdWords and Google DoubleClick can be found at: [marketingplatform.google.com/about/enterprise/](http://marketingplatform.google.com/about/enterprise/), as well as on data protection at Google in general: [www.google.de/intl/de/policies/privacy](http://www.google.de/intl/de/policies/privacy)

### Google Tag Manager

We also use Google Tag Manager to manage the usage-based advertising services. The tool Tag Manager itself is a cookieless domain and does not collect any personally identifiable information. Instead, the tool is responsible for triggering other tags that may collect data (see above). If you have opted out at the domain or cookie level, it will remain in effect for all tracking tags implemented with Google Tag Manager. Find further information here [www.google.de/intl/de/policies/privacy](http://www.google.de/intl/de/policies/privacy).

### 1.7. Cookies

We use cookies in our technology. Cookies help in many ways to make your visit to our website more accessible, enjoyable, and meaningful. Cookies are information files that your web browser automatically saves to your computer's hard drive when you visit our website.

The most common types of cookies are explained below for your understanding:

- Session cookies are used during access to our website (e.g. the online shop) to assign information stored on the server side for each access clearly to you or your internet browser (e.g. so that the shopping cart content is not lost). Session cookies are deleted after closing your Internet browser.
- Permanent cookies are used to save your default settings (e.g. preferred language) over several independent accesses to our website, i.e. even after closing your Internet browser, or to enable automatic login. Permanent cookies are deleted according to the setting of your Internet browser (e.g. one month after the last visit). By using our website as well as the corresponding functions (e.g. language choice or autologin), you consent to the use of permanent cookies.

Cookies neither damage the hard disk of your computer nor is personal data of the user transmitted to us by these cookies. For example, we use cookies to better tailor information, offers, and advertising to your individual interests. The use does not mean that we receive new personal information about you as an online visitor.

Most internet browsers accept cookies automatically. However, you can configure your browser so that no cookies are stored on your computer, or you are always notified when you receive a new cookie.

You will find help for the most common browsers below.

- Microsoft Explorer: [support.microsoft.com/de-ch/help/17442/windows-internet-explorer-delete-manage-cookies](http://support.microsoft.com/de-ch/help/17442/windows-internet-explorer-delete-manage-cookies)
- Firefox: <http://www.support.mozilla.org/de/kb/cookies-erlauben-und-ablehnen>
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=de&hlrm=en>
- Safari: [support.apple.com/de-ch/guide/safari/sfri11471/mac&nbsp;](http://support.apple.com/de-ch/guide/safari/sfri11471/mac&nbsp;)
- Opera: [help.opera.com/Windows/10.20/de/cookies.html&nbsp;](http://help.opera.com/Windows/10.20/de/cookies.html&nbsp;)

The deactivation of cookies may mean that you cannot use all functions of our website.

## PONTRESINA



# SARATZ

- Place of birth
- Nationality
- Official identification card number
- Date of arrival and departure
- Room number

We collect this information in order to fulfil legal reporting obligations, which arise in particular from hospitality or police law. Insofar as we are obliged to do so under the applicable regulations, we forward this information to the competent police authority.

## 2.2. Recording of purchased services

If you receive additional services during your stay (e.g. visit to the restaurant or use of the mini-bar, etc.), we will record the subject of the service and the time of the service for billing purposes.

## 2.3. Guest surveys

Our guests have the opportunity to give us feedback on our services and their experiences. This serves to further develop and improve our services for our guests. For this purpose, the email addresses are transmitted to the company "Medallia Ltd." in Palo Alto CA, USA. Further information can be found in the data protection declaration of Medallia Ltd.

## 2.4. IRC

Our technology uses the rating tool IRC. IRC is a service of IRC-Swiss GmbH, Rainweg 8, 4496 Kilchberg/BL. We use IRC to collect and evaluate customer ratings. You can find more information in the privacy policy of IRC.

## 2.5. Guest W-LAN «Swisscom Public Wireless LAN»

The WLAN network provided in our hotel is operated by Swisscom. The following data can be processed: [IP address, MAC address of your end device and the name given]. In addition, certain usage data may be stored, such as web pages visited, date and time and the IP address. Under the name Swisscom Public WLAN, Swisscom (Switzerland) Ltd offers wireless Internet access at selected locations (hereinafter referred to as "hotspots").

The legal basis for processing this data for this purpose is our legitimate interest in providing the Wifi access during your stay and/or your consent when using the WLAN. Any consent given can be revoked at any time with effect for the future.

## 3. Processing of applicant data

In the following, we provide information on the scope, purpose and use of the personal data collected as part of the application process. We assure you that the collection, processing and use of the data will be carried out in accordance with applicable data protection law and all other legal provisions and that the data will be treated in strict confidence.

### 3.1. Scope and purpose of data collection

If you send us an application, we process the personal data associated with it (e.g. contact and communication data, application documents, notes taken during interviews, etc.) insofar as this is necessary to decide on the establishment of an employment relationship. The processing of this data is necessary for the implementation of pre-contractual measures or is in our legitimate interest. You can inform us at any time that you no longer wish these voluntarily provided personal data to be processed.

The personal data will only be passed on within our company to persons who are involved in processing the application. If the application is successful, the submitted data will be stored in our data processing systems for the purpose of implementing the employment relationship.

# PONTRESINA

# SARATZ

## 3.2. Storage of data in case of non-recruitment

We reserve the right to keep your application documents stored with us for a maximum of 2 years after the application process has been completed, so that we can contact you to fill other interesting positions. If you do not agree with this practice, please inform us briefly.

## 4. Plugins

### 4.1. General

Plug-ins are small additional programmes that extend the functions of web applications. The plugins described in detail below are used on the technology.

The website uses the social plugins described below. The plugins are disabled on our website whenever possible by default and therefore do not send any data. By clicking on the corresponding social media button, you can activate the plugins. If these plugins are activated, your browser will establish a direct connection with the servers of the respective social network as soon as you access one of our websites. The content of the plugin is transmitted by the social network directly to your browser and incorporated by this into the website. The plugins can be deactivated with a click.

### 4.2. Plugins in use

#### a. Facebook Plugins (Like & Share Button)

On this website, Facebook social plugins are used to make our website more personal. For this purpose, we use the "LIKE" or "SHARE" button. This is an offer from the US company Facebook Headquarters, 1 Hacker Way, Menlo Park, California 94025 USA, 1-650-308-7300. By integrating the plugins, Facebook receives the information that your browser has accessed the corresponding page of our website, even if you do not have a Facebook account or are currently not logged in to Facebook. This information (including your IP address) is transmitted from your browser directly to a Facebook server in the US and stored there. If you are logged in to Facebook, Facebook can assign your visit to our website directly to your Facebook account. If you interact with the plugins, for example by clicking on the "LIKE" or "SHARE" button, the corresponding information is also transmitted directly to a Facebook server and stored there. The information will also be posted on Facebook and displayed to your Facebook friends. For this purpose, Facebook uses usage, interest, and relationship profiles, e.g. to evaluate your use of our website with regard to the advertisements displayed on Facebook, to inform other Facebook users about your activities on our website, and to provide other services related to the use of Facebook. The purpose and scope of the data collection and the further processing and use of the data by Facebook, as well as your rights in this regard and setting options for the protection of your privacy, can be found in the [de-de.facebook.com/policy.php](https://de-de.facebook.com/policy.php).

If you do not want Facebook to be able to associate your visit to our website with your Facebook user account, please log out of your Facebook user account.

#### b. Twitter/X

Plugins from Twitter are integrated on our technology. By using Twitter and the "Re-Tweet" function, your visit to our website is linked to your Twitter account and made known to other users. In the process, data is also transmitted to Twitter. We have no knowledge of the content of the transmitted data or its use by Twitter. You can change your privacy settings on Twitter in the account settings at [twitter.com/account/settings](https://twitter.com/account/settings). You can find more information in Twitter's privacy policy at [twitter.com/privacy](https://twitter.com/privacy).

# PONTRESINA

## SARATZ

### c. Instagram

Plugins from Instagram are integrated on our technology. The provider is Instagram Inc., 1601 Willow Road, Menlo Park, CA 94025, USA. If you are logged into your Instagram account, you can link the content of our pages to your Instagram profile by clicking on the Instagram button. This allows Instagram to associate your visit to our pages with your user account. We have no knowledge of the content of the transmitted data or its use by Instagram. For more information, please see Instagram's privacy policy at [instagram.com/about/legal/privacy/](https://instagram.com/about/legal/privacy/).

### d. Pinterest

On this website, we use social plugins of the social network Pinterest, which is operated by Pinterest Inc., 808 Brannan Street, San Francisco, CA 94103-490, USA. When you call up a page that contains such a plugin, your browser establishes a direct connection to the Pinterest servers. The plugin transmits log data to the Pinterest server in the USA. This log data may contain your IP address, the address of the websites visited that also contain Pinterest functions, the type and settings of the browser, the date and time of the request, how you use Pinterest and cookies. For more information, please see Pinterest's privacy policy.

### e. LinkedIn

This website uses functions of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Each time you access a page of this website that contains LinkedIn functions, a connection to LinkedIn servers is established. LinkedIn is informed that you have visited this website with your IP address. If you click the LinkedIn "Recommend" button and are logged into your LinkedIn account, it is possible for LinkedIn to associate your visit to this website with you and your user account. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by LinkedIn. For further information, please refer to LinkedIn's privacy policy.

### f. YouTube

The company providing the Service in the European Economic Area and Switzerland is Google Ireland Limited, a company incorporated and operated under the laws of Ireland (registration number: 368047) with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland (referred to as "YouTube", "we", "us" or "our"). References in these Terms of Use to YouTube's "affiliated companies" refer to the companies of the Alphabet Inc. group of companies pursuant to §§ 15 et seq. German Stock Corporation Act.

### g. Vimeo

On our technology you will find films that are embedded from Vimeo. Vimeo is a product of Vimeo, Inc., 555 West 18th Street, New York, New York 10011, USA. The films are displayed by means of I-frame. This means that a third-party website is accessed in the area of the website where the film is displayed. The data processing in this I-frame is beyond our control. Further information can be found in the Vimeo privacy policy.

### h. TrustYou

On our website we use the plugin from TrustYou Munich Center of Technology, Agnes-Pockels-Bogen 1, 80992 Munich. TrustYou is a service that collects reviews of hotels and processes them into reports. We use data from Trust You in order to be able to offer our visitors an independent assessment of the service. You can find more information in TrustYou's privacy policy.

## PONTRESINA

## SARATZ

### i. TripAdvisor

On our website we use the social media plugin of TripAdvisor Inc, 400 1st Avenue, Needham, MA 02494 USA. TripAdvisor is an online company in the travel industry that collects reviews of tourist offers from its users and combines them with booking recommendations. We use TripAdvisor's widget to display customer reviews about us in a neutral way. TripAdvisor will place a cookie on your computer when you visit a page containing the widget. For more information, please see TripAdvisor's privacy policy.

### j. Google Maps

On our technology you will find maps that are embedded from Google Maps. Google Maps is a product of Google. The maps are displayed by means of I-frame. This means that a third-party website is accessed in that area of the website. The data processing in this I-frame is beyond our control. Google will assign the access to your Google account. For further information, please refer to Google's privacy policy.

### k. HolidayCheck Plugin

We use the social media plugin from HolidayCheck Online Reisebüro, Bahnweg 8, CH-8598 Bottighofen on our website. HolidayCheck is a service that collects reviews of hotels and processes them into reports. We use data from HolidayCheck in order to be able to offer our visitors an independent assessment of the service. You can find more information in HolidayCheck's privacy policy.

### l. HotelCareer

On our website we publish links to job advertisements. Please note that these links forward to pages operated by YOURCAREERGROUP GmbH, Lindenstrasse 25, 8302 Kloten ("YOURCAREERGROUP GmbH"). YOURCAREERGROUP GmbH is responsible for the data protection of these pages. When you click on the respective link, your IP address flows to YOURCAREERGROUP GmbH. The legal basis for the links is a legitimate interest on our part, namely the comprehensive provision of services to our users. You can find more information in the Hotelcareer privacy policy.

### m. Hoteljob-schweiz.de

Hoteljob-Switzerland / -Germany and -Austria (HSHDHö) - the job board for the hotel and catering industry wants to offer its users a user-friendly site. While respecting your privacy and the protection of your personal data, you will find hotel and catering jobs mainly in German-speaking countries.

Because the use of our service requires the disclosure of general personal data, but not sensitive data as defined in the EU Data Protection Directive, HSHDHö requires its users to use the data exclusively in accordance with the purpose of our site.

Access to your data is password protected. Further details can be found in the terms of use. By agreeing to these terms and conditions, you agree that the data you have posted on the applicant/job profile and, if applicable, your photograph may also be viewed by third parties (employer/employee). You are responsible for the content you publish or make accessible. Responsible for the content of the pages is: PowerSearch Management Consulting Hoteljob-Switzerland internet jobservice, Rätusstrasse 23, CH-7000 Chur, info@jobshotel.ch

### n. Protel

Offers can be booked on our site via the Web Booking Engine (WBE) of Protel Hotelsoft wareGmbH, Europaplatz 8, 44269 Dortmund, Germany. As long as you do not access the booking engine, Protel will not be activated. Even though the WBE can be accessed via technology, it is still a separate system operated by Protel. You will therefore need to accept

## PONTRESINA

## SARATZ

a separate privacy policy for this part of the site. For further details on the WBE, please refer to the Protel privacy policy linked there.

### o. Simplebooking

Simple Booking is more than just a booking engine, it's a change of perspective. Elegant, intuitive and integratable with any system, it helps you successfully manage your reservations, increases direct sales and earnings by two digits. QNT S.r.l. a Single Shareholder - All rights reserved Registered office: Via Lucca, 52-50142 - Florence Personal data are processed for the following purposes:

Fulfilment of obligations provided for by laws, regulations or legislation; Activities related to the activity of QNT S.r.l., carried out by means of letters, telephone, advertising material, automated communication systems, etc., for which the data subject has the right to give or withhold consent. Any data subject therefore has the right to refuse or withdraw their consent to processing at any time, without this having any adverse consequences for the relationship or the provision of the services requested prior to the withdrawal.

### p. ReGuest

General information: ReGuest GmbH has drawn up this Internet privacy policy in order to act as a trustworthy partner for visitors to the website, which respects and guarantees the personal right to confidentiality.

In accordance with the DSGVO 2016/679, Michael Mitterhofer is the legal owner of the management or processing of personal data that may be collected via the website. The data controller manages and processes any data collected via the website ([www.reguest.io](http://www.reguest.io)) under the following conditions.

### q. Flickr

Flickr is an image host/photo community operated by SmugMug Inc, Suite 200, 67 E Evelyn Avenue, Mountain View, CA 94041, USA. Flickr collects device data, location data, third party data and data you provide when you access content, ads, web pages, interactive widgets, applications and other products (inside and outside the Services) where Oath's data collection technology, including web beacons (tracking pixels), development tools and cookies are present. This data includes the type of content or ads that are served, viewed or clicked on. For more information, please see Flickr's privacy policy.

### r. Aleno

Aleno is a table reservation system from Aleno AG, Aegertenstrasse 6, 8003 Zurich, Switzerland, +41 43 508 24 65. As a matter of principle, we only process personal data to the extent that this is necessary to provide a functioning application and to provide the services described in the terms of use. The type of processing and the responsibility depend primarily on whether the personal data are collected by us in order to configure the application or are transmitted to us in connection with the use of the application for the purpose of processing. With regard to the processing of personal data collected by us for the purpose of configuring the application (see Section III below), we are deemed to be the controller within the meaning of Article 4(7) of the GDPR, which decides on the purposes and means of the processing of personal data.

### s. Smart Host GmbH

Information on data protection at Smart Host GmbH  
Smart Host GmbH, Am Kupfergraben 6A, 10117 Berlin, [info@smart-host.com](mailto:info@smart-host.com) Enabling and executing the guest's booking; carrying out the guest's stay; tailoring the stay to the guest's wishes and interests; enabling the hotel to continue to offer services in line with the guest's interests; marketing in connection with the hotel's services and improving the hotel's services,

## PONTRESINA

## SARATZ

to service providers and their assistants who offer cloud-based software and data processing solutions for the hotel and evaluate and process the guest's data (for the above purposes) on behalf of the hotel.

### 5. Storage of data and exchange of data with third parties

#### 5.1. Bookings via third-party platforms

If you make bookings via a third-party platform, we receive various personal information from the respective platform operator. In addition, we may receive enquiries about your booking. We will process this data by name in order to record your booking as requested and to provide the booked services.

Finally, we may be informed by the platform operators about disputes in connection with a booking. In doing so, we may also receive data relating to the booking process, which may include a copy of the booking confirmation as evidence of the actual completion of the booking. We process this data to fulfil a contract and to protect and enforce our claims.

Please also note the data protection information of the respective provider.

#### 5.2. Storage of Data

We only process personal data for as long as necessary for the purpose or as required by law. If you have set up an account with us, we will store the specified master data without restriction. However, you can request the deletion of the account at any time (see heading "Your Rights"). We will delete the master data unless we are required by law to retain it. In the case of an order without an account, your master data will be deleted after the expiration of the guarantee period or the end of the service insofar as we are not obliged by law to retain it. This deletion can be carried out immediately or in the course of periodically carried out deletion runs.

Contract data, which may also include personal data, will be kept by us until the expiry of the statutory retention period of 10 years. Data retention obligations arise, among other things, from accounting regulations and tax regulations as well as the obligation to retain electronic communications. As far as we no longer need this data to carry out the services for you, the data will be blocked. This means that the data may then only be used for accounting purposes and tax purposes.

If we wish to refuse further business contacts with a data subject due to abuse, payment default, or other legitimate reasons, we will retain the corresponding personal data for a period of five years or, in the event of a recurrence, for ten years.

#### 5.3. Sharing of your data with third parties

We share your personal data if you have expressly consented, there is a legal obligation, or if it is necessary for the enforcement of our rights, in particular for the enforcement of claims arising from the relationship between you and HOTEL SARATZ AG (e.g. collection agencies, authorities, or lawyers). We may share your data with third parties as far as required in the context of the use of the technology for the provision of the desired services (e.g. outsourcing partners, web hosts, companies through which we offer the services on our technology (e.g. for bookings, rent, purchase, etc.), companies that advertise on our behalf) as well as the analysis of your user behaviour.

When sharing your data with third parties, we provide sufficient contractual guarantees that such a third party uses the personal data in accordance with legal requirements and exclusively in our interest.

## PONTRESINA

# SARATZ

If the technology contains links to third-party websites, HOTEL SARATZ AG no longer has any influence on the collection, processing, storage, or use of personal data by the third party after clicking on these links and assumes no responsibility.

## 5.4. Transfer of personal data abroad

Hotel Saratz is entitled to transfer your personal data to third parties (contracted service providers) abroad if this is necessary for the data processing described in this privacy policy. They are obliged to data protection to the same extent as we are. If the level of data protection in one country does not correspond with Swiss or the European standards, we contractually ensure that the protection of your personal data corresponds to that in Switzerland or the EU at all times.

## 6. Your rights

### 6.1. Right of access, rectification, erasure and restriction of processing; right of data portability, objection and complaint

Upon request, we provide information to each data subject as to whether and, if so, which personal data is being processed about them (right to confirmation, right to information). At your request:

- We waive all or part of the processing of personal data (right to revoke your consent to the processing of non-essential personal data, right “to be forgotten”). Your request to be forgotten will be shared with third parties we have previously shared your personal information with.;
- We correct the corresponding personal data (right to rectify incorrect data);
- We restrict the processing of the relevant personal data (right to restriction of processing, in which case we will only save your personal data or use it to protect our legal rights or to protect the rights of another person.);
- You will receive the relevant personal data in a structured, common and machine-readable format (right to data portability).

To make such a request to exercise any of the rights described in this section, such as when you no longer wish to receive email newsletters or to cancel your account, use the feature on our website or contact our Privacy Officer/or point of contact as stated at the beginning of this Privacy Policy.

If we fail to comply with a request, we will inform you of the reasons for doing so. For example, we may, in a legally permissible manner, deny deletion if your personal data is still needed for the original purposes (for example, if you still receive a service from us) if the processing is based on a compelling legal basis (for example, legal accounting rules) or if we have an overriding interest (such as in the case of litigation against the data subject). If we assert an overriding interest in the processing of personal data, you have the right to object to the processing, provided that your particular situation leads to a different balance of interests compared to other data subjects (right to object). For example, this could be the case if you are a person in the public eye or the processing causes the risk that you will be harmed by a third party. If you are not satisfied with our response to your request, you have the right to lodge a complaint with a competent regulatory authority, for example in your country of residence or at the registered office of Hotel Saratz (right to complain)..

### 6.2. Possibility to Opt-Out

If you do not agree that we evaluate your usage data, you can disable it. Switching off the tracking is done by filing a so-called “opt-out cookie” on your system. If you delete all your cookies, please note that the opt-out cookie will also be lost and may have to be renewed.

Please note that the list below is a list of opt-out options that sometimes includes trackers used by our partners that are not necessarily used on the website:

# PONTRESINA

# SARATZ

- Browser Add-on to disable Google Analytics.
- Turn off the DoubleClick Cookie

A good way to configure a large number of cookies can be found at [youronlinechoices.com](http://youronlinechoices.com) or [optout.aboutads.info](http://optout.aboutads.info) or install the browser extension Ghostery, which is available for every popular browser.

## 7. Further Information

### 7.1. Automated decision-making / Profiling

As a matter of principle, we (or the third parties commissioned by us) do not make any automated decisions that affect your personal data or have legal effects on you or significantly affect you in a similar way.

### 7.2. Data security

We use appropriate technical and organisational security measures to protect your stored personal data against manipulation, partial or total loss, and against unauthorised access by third parties. Our security measures are continuously improved in line with technological developments. You should always keep your information confidential and close the browser window when you stop communicating with us, especially if you share the computer with others. We also take corporate privacy very seriously. We have obliged our employees and the service companies commissioned by us to secrecy and to comply with data protection regulations.

### 7.3. Applicable Law and Jurisdiction

This Privacy Policy and the agreements that are concluded based on or in connection with this privacy policy are governed by Swiss law unless the law of another state is necessarily applicable. Jurisdiction is at the headquarters of Hotel Saratz AG unless another jurisdiction is mandatory.

### 7.4. Final provisions

Should individual parts of this data protection declaration be invalid, this shall not affect the validity of the rest of the data protection declaration. Due to the further development of our technology and offers or due to changed legal or official requirements, it may become necessary to change this data protection declaration. The current data protection declaration is published on our technology.

This document was last amended on 26.08.2023. If you have any questions or comments about our legal notices or data protection, please contact us at [direktion@saratz.ch](mailto:direktion@saratz.ch) or at the contact details listed at the beginning of this data protection declaration.

# PONTRESINA