

Confidentiality Policy

Valotel Alpine Management SA manages the website www.eringerhotel.ch and is therefore responsible for the collection, processing and use of your personal data, in accordance with the applicable data protection laws.

Your trust is important to us. That is why we take data protection seriously and we pay particular attention to appropriate security. We observe the legal provisions of the Swiss federal data protection law (LPD), the order on the federal data protection law (OLPD), the telecommunications law (LTC) and, where appropriate, other applicable provisions on data protection laid down by Swiss law or EU law, particularly the European General Data Protection Regulation (GDPR).

So that you are aware of the personal data we gather from you and what we use it for, please note the following.

If you have any questions regarding data protection, you may contact us at welcome@eringerhotel.ch.

I. Data processing with regard to our website

a. Browsing our website

When you visit our website, our server temporarily records each access in a log file. Without any further action on your part, the following technical data is then captured and stored by us until it is automatically deleted 30 days later:

- The IP address of the computer accessing the website;
- The name of the owner of the IP address (generally your Internet access provider);
- The date and time of access;
- The website from which you have accessed our website (reference URL) and any keywords searched;
- The name and URL of the file consulted;
- Your computer's operating system;
- The browser you use (type, version and language);
- The communication protocol used (e.g. HTTP/I.I.);
- Where appropriate, your username following registration/authentication.

This data is gathered and processed to allow use of our website (to establish a connection), to ensure the long-term security and stability of the system

and to allow optimization of our online offer, and for internal statistical purposes as well.

We also use cookies and pixels to display personalized adverts and to use Internet analysis services when you visit our website. For further details, please refer to paragraphs e. and f. of this confidentiality policy.

b. Use of our contact form

You may use a form in order to contact us. In order to do so, please provide the following information:

- Forename and surname
- Email address
- Telephone number
- Message

We only use this data to be able to reply personally to your request. This data processing is therefore necessary to carry out precontractual measures.

c. Booking via the website, by correspondence or by telephone

When you make a booking via our website, by letter (email or post) or by phone, we need the following data in order to make the booking:

- Title
- Forename and surname
- Postal address
- Email address
- Telephone number
- Your credit card details

We only use this data, and any additional data you provide voluntarily (e.g. date of birth, nationality, estimated time of arrival, vehicle registration number, preferences, special requests, comments, etc.) to make the booking. We process this data in order to register your booking as requested, to provide the services booked, to contact you in the event of any queries or problems, and to ensure that payment is correctly made.

If you make a booking on our website, we will have to share your personal data with D-Edge SAS, 66 rue des Archives, 75003 Paris, FRANCE, the booking engine, and with Protel AG, Bundesplatz 2, 6304 Zug, SWITZERLAND, which manages the property management system on our website (PMS). This system ensures the proper management of hotel

bookings, among other things. This data has to be processed for the performance of the contract we have arranged with you (booking).

d. Cookies

Cookies make it possible to make your visit to our website an easier and nicer experience in many ways. Cookies are files that contain information which your browser records automatically onto your computer's hard disk when you visit our website. For example, we use cookies to temporarily store the services you have selected and the information entered when you complete a form on our website so that you don't have to enter it a second time when you consult a subpage. Cookies may also be used to identify you as a registered user once you have registered on our website. This means that you don't have to reconnect when you visit another subpage. Most browsers accept cookies automatically. You may configure your browser, however, so that it doesn't store any cookies on your computer and a message appears each time you receive a new cookie. Be aware, however, that disabling cookies may prevent you from using all the functionalities of our website.

e. Tracking and retargeting tools

We use retargeting technologies on our website. Your user behaviour is thus analysed in order to be able to offer you advertising suited to your requirements. Your user behaviour is recorded under a pseudonym. Most retargeting technologies operate with cookies (please refer to paragraph e. above). We are thus able to receive the following data thanks to the tracking and retargeting tools we use:

- The browser path taken by the visitor on the website;
- The time spent on the website and on each of the web pages;
- The country, region or town from which the website is accessed;
- The device used;
- A return user or new user.

The data is used to evaluate use of the website, to draw up reports on activity on the website in question and to provide other services connected with activity on the website and Internet use within the scope of market studies. It is in our legitimate interests to process this data in order to constantly improve our website based on our customers' requirements.

This data may also be passed on to third parties if required by law or if the third parties are bound by contract to process this data. Third parties and/or Eringer Hotel may process or store personal data abroad, in which case we make sure that an adequate level of data protection is maintained.

We use the following tracking and retargeting tools:

- **Google Analytics**

We use the Google Analytics analysis service. Google Analytics is a service provided by Google Inc., a company belonging to the holding company Alphabet Inc., whose registered office is in USA. Before being passed on to the service provider, the IP address is abbreviated by enabling the IP anonymisation function. The anonymised IP address passed on by your browser is not compiled with other Google Inc. data. According to Google Inc., the IP address is not linked to other data associated with the user.

- **Google Tag Manager**

To manage the advertising service based on use, we use Google Tag Manager, which is another service provided by Google Inc. We use Google Tag Manager to manage the advertising services based on use. The Tool Tag Manager itself is a domain with no cookies that does not compile any personal data. By contrast, it deletes any other tags that may compile your data. If you disable the domain or cookies, this applies to all the tracking tags implemented with Google Tag Manager.

- **Google Remarketing**

Eringer Hotel has incorporated the Google Remarketing services into its website. Google Remarketing is a component of Google Ad-Words, which allows an enterprise to display adverts to Internet users who have already visited the enterprise's website. Consequently, the incorporation of Google Remarketing enables an enterprise to create user-based advertising and therefore to display adverts relevant to the Internet users concerned. In order to do this, Google Remarketing installs a cookie in the user's information system, which enables Google Inc. to recognize the visitor to the website when he consults other websites which are also members of Google's advertising network. On each visit to a

website on which the service has been incorporated by Google Remarketing, the user's web browser is identified automatically to Google Inc. During the course of this technical procedure, Google Inc. receives personal data, such as the IP address or the user's browsing behaviour, which Google Inc. uses in particular to insert adverts of interest to the user. The cookie is used to record personal data, such as the websites visited.

- **Google AdWords**

Eringer Hotel has incorporated the services of Google AdWords into its website. Google AdWords is a web-based advertising services that enables the advertiser to publish adverts in the results of the Google search engine and in Google's advertising network. Google AdWords enables an advertiser to predefine specific keywords through which an advert is displayed in the Google search results when the user uses the search engine to obtain a search result relevant to the keyword. In Google's advertising network, the adverts are displayed on relevant web pages with the aid of an automatic algorithm, taking previously defined keywords into account. Google AdWords enables us to promote our website by incorporating relevant adverts into third party websites and into the results of the Google search engine and by incorporating third party adverts into our website. If a user accesses our website via a Google advert, a conversion cookie is stored in the user's information system via Google Inc. A conversion cookie is no longer valid after 30 days if it is not used to identify the user. Until the conversion cookie has expired, it may be used to check whether certain subpages, such as the basket of an online store system, have been consulted. Thanks to the conversion cookie, Google Inc and Eringer hotel can both see whether a person accessing an AdWords advert on the website has generated sales, that is made or cancelled a sale. The data and information collected via the conversion cookie are used by Google Inc to create statistics on visits to the website. These statistics on visits are used to determine the total number of users who have been informed by AdWords adverts, to check the success or failure of each AdWords advert and to optimize these adverts for the

future. Neither our company nor other Google AdWords advertisers receive any information from Google Inc. that makes it possible to identify the user.

- **Facebook Pixel**

We also use a communication tool known as Facebook Pixel. A Facebook pixel with a personalized audience is a piece of JavaScript code installed on each page of your website that gathers and sends the data defined by the user to Facebook's marketing program. We use this service to gather data linked to the behaviour of users on our website. The information gathered by the pixel includes the user's browsing session which is sent to Facebook accompanied by the anonymised ID address and the URL visited by the user. Each Facebook user has a unique Facebook ID, regardless of the device used, which helps us to monitor visitors when they access our website from different types of devices. We use this data for commercial purposes and more particularly for targeting adverts with the Facebook advertising platform.

- **Facebook Custom Audience**

We use a communication tool known as Facebook Custom Audience. In general, a non-reversible and non-personal test value (fingerprint) is generated by Custom Audience based on your user data, which may be sent to Facebook for analysis and marketing purposes.

f. **Social plugins and integrated links**

We have incorporated links and social plugins such as Facebook, Instagram, LinkedIn ("Supplier") into our website. When you visit a page on our website that contains a social plugin, your browser establishes a direct connection with the Supplier's services. The plugin enables the Supplier to obtain information as to whether your browser has accessed the corresponding page or clicked on the social plugin icon on our website. This happens even if you do not have a profile with the Supplier or if you are not connected. This information (including your IP address) is sent from your browser directly to one of the Supplier's servers. If you are connected to one of the accounts, the Supplier can link your visit to our website to your profile. If you interact with the plugins, the corresponding information is also sent directly to the Supplier's server and is stored there. The information may also be published and visible to your contacts. We enable you to share the content of our



website directly with the Supplier by clicking on the corresponding button on the website. We cannot intervene with regard to data processed by these Suppliers, however. We therefore recommend that you check their respective confidentiality policies before accessing these social media platforms.

g. Google Maps

We use Google Maps Inc. By using our website and by accessing the services provided by Google Maps, you agree to the gathering, processing and use of automated data by Google Inc. and its agents, and by third parties.

2. Processing of data regarding your stay

a. Processing of data to fulfil legal declaration requirements

Upon your arrival at Hotel Eringer, we need you to provide the following information on yourself and on all persons accompanying you:

- Forename and surname
- Postal address
- Email address
- Telephone number
- Date of birth
- Nationality
- Official identity document
- Arrival and departure dates
- Room number

We collect this information in order to fulfil legal declaration requirements. If we are required to do so by the applicable regulations, we send this data to the police authorities in charge.

b. Processing of data on services

If you receive any additional services during your stay (e.g. purchasing an offer via our SuitePad), we enter the purpose of the service and the date on which you received it for billing purposes. We process this data to fulfil our precontractual and contractual obligations to you, in order to offer you the best possible service.

c. Processing of data to provide related spa services

If you book a service linked to the spa centre during your stay at our hotel, we enter the purpose of the service, the date on which you received it and the following information for billing purposes:



- Forename and surname
- Postal address
- Email address
- Telephone number
- Room number

We process this data and any additional data you provide voluntarily (e.g. preferences, information on health, etc.) in order to execute the contract we have arranged together and to offer you the best possible service.

3. Storage and exchange of data with third parties

a. Booking platforms

If you make a booking via a third party platform, the operator of the platform in question sends us your personal data. In principle, this is the data indicated in section 1 d. of this confidentiality policy. Any special requests concerning your booking may also be sent to us. We process this data to enter your booking and to provide you with the services booked in accordance with your request. This data has to be processed in order to execute the contract arranged with you.

Finally, the platform operators may also inform us of potential disputes connected with a booking. They then send us data on the booking process that may include a copy of the booking confirmation. Please note that we cannot intervene with regard to the data processed by the operators of these platforms. We therefore recommend that you check the confidentiality policies of the respective suppliers.

b. Centralized storage and linking of data

We record the data indicated in sections 1 and 2 in a centralized electronic data processing system. The data concerning you is then systematically entered and grouped with a view to processing your bookings and providing the contractual services. In order to do this, we use a program developed by the company Rebagdata AG "Protel", Einsiedlerstrasse 533, 8810 Horgen, Switzerland.

c. Filing of data and period of storage

We only keep personal data for as long as necessary,

- in order to use the tracking, advertising and analysis services mentioned above within the scope of our legitimate interests;



- in order to provide the services mentioned above, which you have requested or to which you have given your consent;
- in order to meet our legal obligations.

We keep the contractual data for a longer period, as required by the legal obligations on storage. The storage obligations, which require us to store data, derive from the accounting and tax regulations. According to these regulations, commercial communications, contracts concluded and accounting documents must be kept for 10 years. If we no longer need this data to provide you with our services, the data is blocked. This means that the data can only be used for accounting and tax purposes.

d. Transmission of data to third parties

We only pass on your personal data if you have given your express consent, if we are legally required to do so or if that is necessary to assert our rights. Moreover, we only pass on your data to third parties if that is necessary within the scope of use of the website and performance of the contract and in particular to process your bookings. Our web hosting company - Amazon Web Services (AWS) is a service provider to which we pass on personal data collected via the website, or which has access or may have access thereto. Data is passed on in order to provide and maintain the functionalities of our website.

Finally, if you pay by credit card via our website, we pass on your credit card details to the card issuer and acquirer. If you choose to pay by credit card, you must enter all necessary details. Please also check the confidentiality policies of your credit card issuer.

e. Transmission of personal data abroad

We are also authorized to pass on your personal data to third party companies (authorized service providers) abroad for the data processing described in this confidentiality policy. These enterprises are subject to the same level of protection as we are.

4. Further information

a. Right to information, to the rectification, erasure and restriction of processing; right to data portability

You have the right to request information on the personal data we store concerning you. You also have the right to rectify any incorrect data and to the erasure of your personal data, if that does not conflict with a legal

obligation to store the data or an authorization event enabling us to process the data. Pursuant to articles 18 and 21 of the GDPR, you also have the right to demand a restriction of the processing of data and to object to the processing of data.

You also have the right to retrieve the data supplied to us (right to data portability). On request, we also send data to a third party of your choice. You have the right to receive data in a common file format.

You may contact us for the purposes mentioned above on the email address welcome@eringerhotel.ch. We may, at our sole discretion, require proof of identity to deal with your requests.

b. Minors

We do not wish to gather personal data concerning minors; however, we are not always able to check the age of persons visiting and using our websites. If a minor provides us with his data without the consent of his parents or legal guardian, we ask the latter to contact us in order to delete this data and to prevent the minor from receiving any promotional material from us in the future. You may contact us on welcome@eringerhotel.ch in this respect.

c. Data security

We use appropriate technical and organizational security measures to protect the personal data concerning you that we record against any manipulation, partial or total loss or any unauthorized third party access. Our security measures are constantly improved based on technological progress. You must always keep your access details confidential and close the browser window when you have finished communicating with us, particularly if you are not the only person using the computer. We also take data protection very seriously within our company. Our collaborators and the service providers we appoint are subject to secrecy and to observing the legal provisions on data protection.

d. Notice regarding the transfer of data to USA

For the sake of completeness, we inform users whose domicile or registered office is situated in Switzerland that USA is subject to surveillance measures by the US authorities. These authorities generally allow the recording of all personal data on persons whose data has been sent from Switzerland to USA. We would also inform you that, in USA, for the persons concerned originating from Switzerland there are no recourse channels enabling you to



access the data concerning you and to obtain the rectification or erasure thereof, or effective judicial protection against the US authorities' general rights of access. We specifically draw the attention of persons concerned to this legal and factual situation so that they can make an informed decision on consent to the use of their data. We inform users domiciled in a Member State of the EU that, according to the EU, particularly on account of the matters mentioned in this section, USA does not have a sufficient level of data protection. As we have explained in our confidentiality policy that certain data recipients (e.g. Google) have their registered office in USA, we ensure through their certification via the EU-USA or Switzerland-USA privacy shield, that your data benefits from a reasonable level of protection with our partners.

e. Right to make a complaint to a supervisory authority responsible for the surveillance of data protection

You have the right to make a complaint to an authority responsible for the surveillance of data protection.

f. Amendment to the confidentiality policy

If certain parts of this confidentiality policy are not valid, that will not affect the validity of the rest of the confidentiality policy.

Moreover, we reserve the right to amend the confidentiality policy at any time to adapt it to a modified legal situation or to changes in our services or the data processing.

g. Applicable law and jurisdiction

The use of our website and the use of our services are subject to Swiss law. The competent court is the Court of the "district d'Hérens and Conthey".

Héréence, the 10th of November 2021