

# PRIVACY POLICY

## Introduction

Welcome to "<https://www.alkimathens.com>" the website (hereinafter referred to as "**Website**") of the private capital company under the name "**MARGARITA KONTZIA MONOPROSOPI IDIOTIKI KEFALAIOUCHIKI ETAIREIA**", having its registered seat in Athens, Tompazi Street no. 10, with Tax Identification Number 801194883 and with a GEMI number 151486701000, as legally represented [hereinafter "**the Company**" or "**we**"], through which the (non-primary) hotel accommodation of the Company is promoted with the distinctive title "**ALKIMA ATHENS**" (furnished rooms for rent, 5-key classification) and reservation and related services are provided.

The use of the Website is subject to the **Website Terms and Conditions of Use** ([link](#)), the **Transaction/Booking Terms and Conditions** ([link](#)) and this **Privacy Policy** and the **Cookies Policy** ([link](#)) which is an integral part of the Privacy Policy.

By using the Website and our services, you unconditionally declare that you have reviewed, understood and accepted all the terms of the Website. If you do not agree with any of the terms contained in these terms (e.g. the Website License Terms and Conditions and/or the Privacy Policy), you should refrain from visiting and using the Website and its services.

The Privacy Policy may be subject to amendments and adjustments, from time to time, whenever deemed necessary and without prior notice to you, which will apply from the date they are published on the Website. We therefore recommend that you review the Privacy Policy regularly.

The Privacy Policy describes how our Company, as a "**Data Controller**" within the definitions of the applicable legislation on the protection of personal data (General Data Protection Regulation (EU) 2016/679 or simply "GDPR", Law 4624/2019), collects and processes personal data and other information about you, the users of the Website and our services, as well as how our Website uses cookies and any other identification technologies/trackers.

## Company Details

The full details of our Company, which is responsible for the Processing of your personal data, are as follows:

Name: **MARGARITA KONTZIA MONOPROSOPI IDIOTIKI KEFALAIOUCHIKI ETAIREIA**

Headquarters/Postal Address: **TOMPAZI 10, ATHENS, ATHENS / CENTRAL SECTOR OF ATHENS, 10553**

VAT number: **801194883**

GEMI Number: **151486701000**

Contact Phone: **+30 2103210888, +30 6980328095**

Email: **info@alkimathens.com**

## Scope & Purpose of the Privacy Policy

The Company is committed to safeguarding the confidentiality of your personal data. The Privacy Policy is intended to help you understand, among other things, the following:

- the purpose for which we process your personal data,
- the categories of your personal data that we collect and process,
- the retention period of your personal data,
- the categories of recipients of your personal data, if any,
- if we transfer such data to a country outside the European Union (EU)/European Economic Area (EEA);
- if we make automated decision-making or profiling, and
- the rights you have in relation to the processing of your personal data, as well as how you can exercise them.

The Privacy Policy is categorized into separate sections/chapters to facilitate your information and explains:

1. What data we collect about you, how we collect it, and how we use it?
  - 1.1. Data we collect directly from you
  - 1.2. Data collected through the use of cookies and other tracking technologies
  - 1.3. Data collected by third parties
  - 1.4. Anonymized - statistical data
  - 1.5. Special Data Categories
2. On what legal bases is the processing of your personal data based?
3. How long do we keep your personal data?
4. To whom do we disclose and/or transmit your personal data?
5. How do we ensure the security of your data?
6. What rights do you have in relation to your personal data?
7. Links to Third Party Websites
8. How can you contact us?

## 1. What data we collect about you, how we collect it, and how we use it?

### 1.1. Data we collect directly from you

**Communication:** When you communicate directly with us for any reason (e.g. through our Website, or based on our other contact details), we process certain categories of your personal data to respond to the communication between us. In particular, when we communicate in any way (e.g. by email, through any available contact form) we collect and process the information you provide to us directly, which may include: your full name, your email address, your telephone number, and the message you send to us. We will use this information to contact you and respond to your question and/or request.

**Services:** When we provide our services to you, we process certain categories of personal data in order to fulfil the contract/business relationship between us. When you make a reservation or order a service (e.g. through the Website or by telephone or email), we process certain data about you, such as your name, email, address, telephone number, date of birth, booking details (e.g. date of arrival, etc.), travel information (e.g. visa, passport), special comments (e.g. dietary preferences) and payment details (e.g. invoice), in order to manage your booking and provide you with the services you ordered and agreed upon.

**Subscription to Newsletter:** Users who wish to be informed about our Company's services and news can subscribe to our newsletter through the Website. When you subscribe to the list of recipients of our newsletter, we process specific categories of your personal data, specifically your email address, in order to provide you with the relevant material.

**Job Applicants' Requests:** We collect and process specific information about you when you send us your CV by applying for a job in our Company through our Website or any other available means (e.g. via email). More detailed information on the processing of candidate employees' personal data can be found in the specific **Job Applicants Privacy Policy** of our Website (available [here](#)).

## 1.2. Data collected through the use of cookies and other tracking technologies

We also use cookies and collect information about how you use the Website, technical information, including information about access time, amount of information transmitted, transmission status, browser type, version and language, browser plug-in type and version, IP address, operating system and system interface, time zone and location setting; and information such as the referring website, pages you visit, actions taken, patterns of visits and navigation on a website. Please see in detail the **Cookies Policy** of our Website, which is available [here](#). The **Cookies Policy** is an integral part of this Policy and also governs the use of the Website.

## 1.3. Data collected by third parties

Your personal data that we collect from third parties is in particular technical data, which relates to the details of your device (e.g. manufacturer, model, display features, operating system, etc.), or financial data (e.g. tokens with some details of the card through which you pay for a reservation at our hotel, which means that we do not know the full details of your card, your card is stored pseudonymously for the purpose of facilitating your future transactions through the Website), as well as statistics or elements of your behavior (e.g. clicks, choices). For example, we receive some of the above-mentioned technical data from statistical data providers, such as Google.

## 1.4. Anonymized- statistical data

We may process anonymized and statistical data for any purpose, in particular for statistical purposes and to improve the services – information provided by the Website. Although this data may be derived from your personal data, it is not considered personal data as long as it does not directly or indirectly reveal your identity (for example, we may collect anonymous, statistical data about the use of the Website in order to calculate the percentage of users who have access to certain elements of the Website).

## 1.5. Special Data Categories

As a general rule, we do not knowingly collect and process through the Website special categories of personal data ("sensitive" personal data), such as information about your health, race or ethnicity, religious or philosophical beliefs, your sex life, etc. We may collect health data that you provide to us directly in case we need to fulfill a request of yours during your stay at our hotel (e.g. if you have a mobility problem or suffer from allergies or eating disorders and we need special care).

## 2. On what legal bases is the processing of your personal data based?

- 2.1.** We process your personal data when the law allows us to do so, that is, when there is a legitimate basis, in accordance with the applicable legislation, such as in the following cases:
- 2.2. Performance of Contract:** The processing is necessary for the performance of a contract between us in accordance with case (b) of par. 1 of art. 6 GDPR, or in order to take steps at your request before the conclusion of the contract (e.g. when you book a room).
- 2.3. Consent:** You have provided your consent, in accordance with case (a) of par. 1 of art. 6 GDPR, for the processing of your personal data for one or more specific purposes such as when you contact us directly through the Website, when you subscribe to our newsletter, or when you consent to the installation and use of specific, optional types of cookies (see more details **Cookies Policy**).
- 2.4. Legal Obligation:** The processing of your personal data is necessary for us to meet our legal obligations in accordance with case (c) of para. 1 of Art. 6 GDPR, e.g. in case a competent judicial authority requests access to your personal data, or when we provide you with paid services and we have to meet the requirements of tax legislation law (e.g. processing necessary data for the issuance of the tax document required by law).
- 2.5. Legitimate Interests of our Company:** The processing is necessary for the purposes of legitimate interests pursued by our Company, provided that your fundamental rights do not override those interests, in accordance with par. (f) of par. 1 of art. 6 GDPR. Such legitimate interests include: (a) controlling the effective and secure operation of our Website, as well as safeguarding it from malicious actions, (b) optimizing our Website, (c) monitoring its operation.
- 2.6.** Please note that we do not use automated decision-making without human intervention, including profiling, in a way that produces legal consequences concerning you or otherwise materially affects you.

## 3. How long do we keep your personal data?

- 3.1.** In general, we keep your personal data for as long as necessary by law, depending on the purpose and type of processing.
- 3.2.** In particular, your personal data will be retained for as long as it is necessary to achieve the purposes for which we collect them, e.g. for as long as it is necessary to provide you with functions of our Website and services requested. Once the purpose for which the data processing has been achieved, we will either delete your personal data or anonymise your personal data, unless there are legal grounds for retaining them.

Especially:

- We retain your personal data that we collect from you when you contact and/or interact with us through our Website or any other available means of communication for the necessary period of time until the final resolution of your relevant issue for which you have contacted us (e.g. submitting a request or query), and until any related claims are time-barred.
- We retain your personal data that we collect from you when you subscribe to the Newsletter, for as long as you remain subscribed and we delete them in case you withdraw your consent and request your deletion from the list of recipients of our Newsletter.

- We retain your personal data that we collect from you when you contract with us for as long as the contractual relationship between us lasts, as well as for the maximum period of time required from its expiration to meet our legal obligations under the legislation governing our Company's activity (e.g. keeping tax documents) and until any related claims are time-barred.

**3.3.** Regarding cookies/trackers' retention times/duration, please refer to **Cookies Policy**, available [here](#). Regarding the retention periods of the personal data that you disclose to us as a prospective employee in the context of your application for a job in our Company, please refer to the **Job Applicants Privacy Policy**, also available [here](#).

## 4. To whom do we disclose and/or transmit your personal data?

**4.1. Service Providers:** Our Company may appoint external/third-party service providers (e.g. internet service providers, providers of advertising services, technical support of the Website, e-mail, data hosting), who will provide us with support services and who may process specific categories of your personal data during the provision of the services acting as "Processors" in accordance with the applicable legislation on the protection of personal data. Our Company ensures that third-party service providers are contractually bound to protect your personal data in accordance with the applicable legislation.

**4.2. Other recipients:** Our Company may disclose, in compliance with the applicable legislation on the protection of personal data, your personal data to judicial and/or prosecuting authorities, independent authorities, government authorities, if required in accordance with applicable legislation.

**4.3. Data transfers outside the European Union/European Economic Area:** In the event that to the extent, in the context and for the needs of the aforementioned purposes, your personal data needs to be transferred outside the European Union, the transfer of these data will be done in accordance with the applicable legislation and our Company will ensure an adequate level of data protection. By entering into appropriate contracts for the transfer of data based on Standard Contractual Clauses, which we may disclose to you at your request, or by taking other measures to provide an adequate level of data protection, our Company ensures or confirms that the recipients provide an adequate level of protection of your personal data.

## 5. How do we ensure the security of your data?

Taking into account the latest developments, the costs of implementation and the nature, scope, context and purposes of the processing, as well as the risks of different likelihood and severity for the rights and freedoms of natural persons resulting from the processing, we implement appropriate technical and organizational measures to ensure a level of security commensurate with the risks of the processing.

## 6. What rights do you have in relation to your personal data?

Under the conditions provided for in the applicable legislation, you have the following rights regarding your personal data:

**6.1. Right of access:** You can contact us in order to inform you and explain whether and what personal data we hold about you, as well as how we process it. You can also request a copy of your personal data, if they are processed.

**6.2. Right to rectification:** If you believe that your data is inaccurate or needs to be updated, you have the right to request the rectification of inaccurate personal data and the completion of incomplete information.

**6.3. Right to erasure:** Under certain conditions, such as when the data is no longer necessary, you have withdrawn your consent, the data has been unlawfully processed, you can ask us to delete it.

**6.4. Right to restriction of processing:** If you consider that your data is inaccurate or that its processing is unlawful or you consider that the data is no longer needed by us or you have objections to automated processing, you have the right to request the restriction of processing.

**6.5. Right to object:** You can object to the processing of your personal data by us on grounds that concern you and are related to your particular situation, unless, among other things, there are compelling and legitimate grounds for the processing, which override your interests, rights and freedoms. You also have the right to object where a decision concerning you is based solely on automated processing, including profiling, and that decision produces legal effects or significantly affects you (statutory exceptions apply).

**6.6. Right to data portability:** You can request to receive your data in a structured, commonly used and machine-readable format, as well as to have your data transmitted to another organization (controller), which you will indicate to us.

**6.7. Right to withdraw consent:** In the event that the processing of your personal data is based on your consent (e.g. in the case of subscribing to our newsletter), you have the right to withdraw it at any time. The withdrawal of consent shall be without prejudice to the lawfulness of the processing carried out prior to such withdrawal.

**6.8. Right of Appeal:** We inform you that you have the right to appeal to the Personal Data Protection Authority (HDPa) for issues related to the processing of your personal data. The HDPa is based in Athens (1-3 Kifisias Street, P.C. 115 23). Regarding the competence of the HDPa and how to submit a complaint, you can visit the website of the HDPa ([www.dpa.gr](http://www.dpa.gr)).

**6.9. Exercising Rights:** In order to exercise your rights, you can contact us at our following e-mail address: [info@alkimathens.com](mailto:info@alkimathens.com).

## 7. Links to Third Party Websites

The Website may include links to other websites, platforms and/or applications that we do not control (hereinafter referred to as "Third Party Websites"). The Privacy Policy does not cover information collected by Third Party Websites that you visit through links that may be located on the Website. The aforementioned Third Party Websites have their own Privacy policies and terms and conditions of use. We recommend that you read them before navigating and/or using these Third-Party Sites.

## 8. How can you contact us?

We remain at your disposal for questions and clarifications. Contact us at our contact details:

**Email:** [info@alkimathens.com](mailto:info@alkimathens.com)

**By phone:** +30 2103210888, +30 6980328095