



PRIVACY POLICY ALPENGOLD HOTEL

We are committed to protecting the privacy of users of our website (www.alpengoldhotel.com) and our services. Please therefore find below a detailed explanation on how we process personal data.

The data controller for this website is AlpenGold Hotel AG in Davos. AlpenGold Hotel AG complies with applicable data protection laws.

WHAT DO WE MEAN BY DATA PROCESSING?

For the purposes of this Privacy Policy, any handling of personal data is defined as data processing. This includes but is not limited to the:

- collection,
- storage,
- management,
- use,
- transfer,
- disclosure and
- erasure of personal data

The basic settings on our websites, forms, and apps only collect the information necessary for our services and are mandatory. If you refuse to provide this data, we may not be able to provide our services. The storage of this data is subject to legal legislation.

You voluntarily provide us with additional information for storage to offer you additional services and to increase the personal benefit. This data can be adjusted or deleted at any time through our contact.

Further data processing by third-party service providers, is to provide the service you have requested, and any other purposes described in this document and the Cookie Policy.

Unless otherwise specified in this document, personal data will be processed and stored for as long as it is necessary for the purpose for which it was collected and may be kept for longer periods if necessary to comply with a legal obligation or based on the user's consent.

WHY DO WE RECORD YOUR DATA?

To allow us to provide our services, we need to collect data concerning you. This enables us to offer a functional website and offer other content and individual services. Wherever possible, AlpenGold Hotel AG requests consent when it requires information that can personally identify you or could be used to contact you. In general information about you is recorded when you make room, restaurant, or Spa Nescens reservations, request additional information on a web offer, or apply to take part in a prize draw or competition. We only collect personal data if and to the extent necessary for the provision of the requested services or communication of relevant information relating to those services.

WHEN DO WE RECORD YOUR DATA?

Personal data may be recorded whenever we are in contact with you, or you are active on the website. We can be in contact with you in a range of situations. The list below therefore merely gives some examples:

- You use our customer support to obtain information or to book through the IHG central reservation service or our in-house reservation service;
- You sign up for our newsletter or other marketing related to our services;
- You communicate with us by telephone, fax, e-mail, voicemail, text message, video messaging or instant messaging.
- You use the Spa Nescens contact form to make a spa booking.

If you make a reservation online for a room or a table in one of our three restaurants, you will be directed to the relevant third-party service. Third-party services are covered by their own privacy policy and terms and conditions. You are advised to read through the privacy policies of third-party websites, as they may differ from ours. You can find more information hereafter:

- o Room reservations and registration over IHG Hotels & Resorts central reservation. Connection to www.ihg.com. The IHG privacy policy is available [here](#).
- o Table reservations via the restaurant management system "Aleno" with forwarding to www.aleno.me. The data protection regulations of Aleno can be viewed [here](#).

WHAT DATA DO WE COLLECT?

We may collect a range of different personal data. In line with the services provided, we collect a range of personal data from you either automatically or manually.

Data collected includes but is not limited to:

- Company name;
- Surname and first name;
- Gender;
- Address;
- Nationality;
- Billing address;
- Language preferences;
- Telephone numbers;
- E-mail addresses;
- Information on newsletters or other marketing to which you have subscribed;
- Consent to the receipt of marketing;
- Booking history;
- Room and/or food preferences/allergies and intolerances
- Each time you access our website, data are temporarily automatically recorded and a log file is created:



- o Information on the browser type and version used
- o The operating system of the user
- o The Internet service provider of the user
- o The IP address of the user
- o The date and time of access
- o Websites from which the user's system accesses our website
- o Websites accessed by the user's system through our website

WHY DO WE PROCESS YOUR DATA?

Personal data is processed for a range of different purposes. We make every effort to keep data processing to the minimum required. Processing can be broken down into the following purposes: We may process your personal data for individual purposes only or more than one purpose:

Processing in connection with the use of our services and access to our website

- Each time you access our website, data are temporarily automatically recorded, and a log file is created;
- For the provision of services (for example bookings);
- For the organization and provision of customer support.

Processing in connection with customer communication

- Personal data can be used to communicate important information, for example, modifications and changes to the terms and conditions and changes to services or prices that directly affect the customer;
- For administering and engaging in communication with customers by post or electronically, for example by e-mail.

Processing for analyzing customer behavior

- For the analysis of our website;
- For evaluation of services used and customer behavior;
- For statistical analysis based on anonymized user data

Processing for marketing purposes

- For providing information on new products and services;
- For sending individual, personalized marketing by post, telephone, fax, e-mail, voicemail, text message, multimedia messaging (MMS), video messaging, or instant messaging (where consent has been given).
- If you have signed up for our newsletter or agreed to electronic communication of information on our products and services in any way, we can send you information electronically. When you subscribe to our newsletter, you will periodically receive news and information about new offers and events relating to AlpenGold Hotel. The data you provide when you sign up (title, name, e-mail address, and language) shall only be used to send the newsletter. To send the newsletter, we use the e-mail address you provided and require your confirmation that you, the owner of the email address, consent to receipt (double opt-in). You can unsubscribe at any time using the unsubscribe option provided in the newsletter or at privacy@alpengoldhotel.com.



WHAT IS OUR LEGAL BASIS FOR PROCESSING PERSONAL DATA?

- All data processing has a legitimate legal basis. The legal bases for processing your data are as follows:
- Data are saved and processed to provide a functional website based on the legitimate interest of AlpenGold Hotel AG.
- If you contact us to use a service or make an inquiry or booking, the legal basis for data processing is the performance of a contract.
- The legal basis for data processing for marketing purposes, including but not limited to newsletters, is your consent.

WHEN DO WE DISCLOSE DATA TO THIRD PARTIES OR DATA PROCESSING COMPANIES?

For the purpose of service provision, it can be necessary to involve external companies. In such cases, data may be provided by us to external companies and/or saved by those companies. For example, we use an external data center in Europe for the operation of the website. We only disclose data that are necessary for the provision of the services.

The hotel is operated by Michel Reybier Hospitality. For booking inquiries, you are directed straight to the IHG Hotels & Resorts booking portal at www.ihg.com. That booking portal is not provided by AlpenGold Hotel AG and is governed by the privacy policy of the IHG Hotels & Resorts which can be viewed [here](#).

To allow you to make online reservations in our restaurants, our website is also linked to the online booking tool "Aleno". As soon as you have entered your reservation details, you are automatically directed to www.aleno.me. Reservations are made by Aleno's terms and conditions. The Aleno privacy policy can be viewed [here](#).

We send our newsletter through the server of "Mailchimp". Mailchimp is a registered trademark of Rocket Science Group. The external companies we use are bound to process data exclusively as per our instructions and for the purposes specified by us. Said external companies also must undertake the necessary organizational and technical measures to ensure data protection. The Mailchimp privacy policy can be viewed [here](#).

For the purchase of vouchers, you will be connected to the platform of "E-Guma". You can find the data protection regulations of this provider [here](#).

In exceptional cases, we disclose data if we have a statutory obligation to do so or if we are required to do so by a court or public authority as part of court or other proceedings. We may also disclose data if this is necessary for the protection and defense of the rights or property of AlpenGold Hotel AG, including the security of our products and services.

LINKS TO OTHER WEBSITES

Our websites and applications may contain links to websites that are maintained and/or controlled by third parties. In some instances, these websites may be co-branded and display our logos or other trademarks. You can always tell whether you are on one of our



websites by checking the uniform record locator ("URL") on the page that you are visiting. We encourage you to review the privacy policies of these third-party websites as their privacy practices may differ from ours.

FOR HOW LONG DO WE STORE YOUR DATA?

We store personal data for as long as necessary to achieve the purpose in question or for any statutory retention period. We immediately delete personal data that are no longer required. Personal data are deleted at the end of the statutory retention period at the latest.

ARE YOUR DATA SAFE WITH US?

We use an external data center for website operation and for the storage of data. We carefully selected and instructed the data center and monitored its compliance with the agreed security regulations. The operator of the data center has undertaken to employ appropriate safeguards to protect the data collected and to store said data on secure servers. We have suitable technical and organizational measures in place to safeguard against loss, destruction, and manipulation. Your data are also protected from access, modification, and distribution by unauthorized persons. Sensitive data is encrypted for transfer and may be sent over various channels, including the Internet. Although we employ all suitable and reasonable safeguards, you should be aware that the transfer of information over the Internet is always subject to a certain security risk and that we are therefore unable to guarantee absolute security.

DO WE USE COOKIES AND ANALYTICAL TOOLS?

Yes, we use cookies and web beacons. We automatically collect data with cookies and web beacons. Cookies are small files that are saved on your computer or mobile device when you use our website. Web beacons are small graphic images on our website that enable log file recording and log data analysis.

What types of cookies do we use and how do we use them:

We use three primary types of cookies, which include:

- **Functional Cookies** - These cookies support the use of the website and applications and enable certain features to enhance your experience. For example, we use functional cookies to facilitate your reservation and to remember your selections as you move from page to page. We also use functional cookies for remembering things like your sign-in information and hotel preferences to avoid you having to re-enter it.
- **Performance Cookies** - these cookies collect information needed to support the website and our applications and allow us to improve our website and identify any problems that you faced while visiting us. For example, performance cookies may provide us with information about how you came to our website and how you navigated around our website during your visit. We also use these cookies to



provide us with certain statistical and analytics information, such as how many visitors came to our website or how effective our advertising is.

- Targeting Cookies - these cookies are used to collect information from you to help us improve our products and services as well as serve you with targeted advertisements that we believe will be relevant for you. We use targeting cookies across our websites and applications for various marketing initiatives and campaigns. For more information, please see the "Targeted advertising" section below.

Managing cookies and opting out:

At your initial visit to our website, a notification will automatically pop up, requesting your permission for the usage of cookies. You can choose to visit our websites without cookies,

but in some cases, certain services, features, and functionality may not be available. To visit without cookies, you can configure your browser to reject all cookies or notify you when a cookie is set. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

Other technologies:

Other technologies such as pixels and web beacons may also be used on our websites, mobile applications, email messages, and other areas of our business. These technologies are used to improve our products and services as well as our marketing efforts.

Mobile Applications:

We receive information about you when you use our mobile applications. Some information such as your device manufacturer and type are collected automatically, while other information is only collected if you choose to provide it, such as your location information. Where we process and use your personal information in connection with any mobile applications, we will do this in line with the general principles outlined in this Statement unless we tell you otherwise.

Google Analytics:

This website uses Google Analytics, a web analysis service provided by Google Inc. ("Google"). The information about your use of this website (including your IP address) that is created by the cookie is transferred to a Google server in the USA and stored there. Google uses this information to analyze your use of the website, to compile reports about website activity for the website operator, and to provide further services in connection with the use of this website and the Internet. This information may also be provided to third parties if legally required or if third parties process this data on behalf of Google. Google will never associate your IP address with any other Google data. By accepting cookies, you agree to the processing of the data collected by Google, concerning you in the manner and for the purpose described above.

More information is available here:

<http://tools.google.com/dlpage/gaoptout> or
<http://www.google.com/intl/de/analytics/privacyoverview.html>.

LUDE SOCIAL NETWORK PLUGINS?



Yes, our website includes direct links to the following social media channels:

- [Facebook.com/alpengoldhotel](https://www.facebook.com/alpengoldhotel)
- [Instagram.com/alpengoldhotel](https://www.instagram.com/alpengoldhotel)
- [linkedin.com/alpengoldhotel](https://www.linkedin.com/alpengoldhotel)
- <https://www.youtube.com/watch?v=78zHLzRjKxU>

Online Channels:

We may use information from online sources, such as websites, social media, and information-sharing platforms. This information may be used to help tailor and improve our services and communicate with you effectively, as we know many of our customers use a range of media channels to communicate and share information.

We may use various social media features such as the Facebook "Like" button on our websites and mobile applications. Certain information may be shared or otherwise provided to us through your use of these features in conjunction with our services and programs. Subject to your account and privacy settings, we may also be able to see information that you post when using these social media platforms whether you are using one of our services or not. In some instances, depending on the circumstances, we may contact you on these social media platforms. The information you post on social media sites as well as the controls surrounding these disclosures are governed by the respective policies of these third parties.

Where we use information from these sources, we will respect any permissions you have set about how you would like your information to be used for each source.

WHO IS THE DATA CONTROLLER?

We -AlpenGold Hotel AG- are the data controller.

WHAT RIGHTS DO YOU HAVE REGARDING YOUR DATA?

You have the right to request access to the personal data we hold concerning you at any time. In the event of errors in that data, you have a right to obtain its rectification if you are unable to rectify the data yourself via the website. You also have a right to object to data processing and a right to the erasure of data.

You have the right, for reasons arising from your particular situation to object at any time to the processing of your data that is either based on public interest or the legitimate claim of interest by AlpenGold Hotel AG.

Should the processing of personal data be necessary for the monitoring or provision of services, we can neither erase the data nor cease to process it. Our contact details are provided at the end of this Privacy Policy. We reserve the right to communicate electronically (particularly by e-mail).

CAN THIS PRIVACY POLICY BE AMENDED?

We reserve the right to amend this Privacy Policy at any time. Changes shall come into effect 14 days after their publication on the website. The latest privacy policy can always be viewed at www.alpengoldhotel.com/en/privacy-policy/.

WHO CAN YOU CONTACT WITH DATA PROTECTION QUERIES?

Please do not hesitate to contact us for more information about data protection. For questions regarding the above Privacy Policy or your data held at the hotel level, please contact us as follows:

E-Mail: privacy@alpengoldhotel.com

Telefon: +41 81 414 04 00

Via post:

AlpenGold Hotel Davos

Baslerstrasse 9,

7260 Davos Dorf

Switzerland

FURTHER CONTACTS TO THE MOST USED THIRD-PARTY PROVIDERS

- Room booking:
"InterContinental Hotels Group" (IHG) is an international hotel group. The main EU office for GDPR purposes is in Frankfurt am Main in Germany. You can find the privacy policy [here](#).

"Oracle Hospitality OPERA" is a management solution for hotels & venues. The privacy policy can be found [here](#).

- Restaurant Reservation:

"Aleno AG" operates the website www.aleno.me ("Website") and is deemed to be the controller within the meaning of the GDPR, which decides on the purposes and means of the processing of personal data in the context of the use of this Website. The data protection regulations are compiled [here](#).

- Booking confirmation

When you make a booking, you will receive a confirmation via the "RIMS" system. The data protection provisions of RIMS can be viewed [here](#).

- Newsletter

"Mailchimp" is a marketing automation and email marketing platform and belongs to "Rocket Science Group". Newsletters are generated with this platform. More information on the handling of personal data at Rocket Science Group can be found [here](#) in their Rocket Science Group privacy policy:

- Customer Relation Management

In the area of customer relation management, we use the software solutions of "SalesForces". The privacy policy can be found [here](#).

- Statistics

Via "Feratel" we communicate with the destination Davos Klosters. This is used, for example, to generate the registration form or the guest card. The data protection regulations are summarised [here](#).

- Video surveillance

For your safety, the public areas of the hotel are video monitored and recorded ~~via video surveillance~~. The recorded data is stored in the hotel itself and is not connected to the internet. The data is automatically deleted after 2 months. This service is provided via "Wisenet WAVE" with the data protection regulations, which you can view [here](#).

- Internet access

For Internet access, we offer you the W-LAN service of "Sunrise" and "at-vision", to which the data protection regulations for Sunrise are linked [here](#) and for at-vision [here](#). ~~In parallel~~, You are free to choose from the other providers offering mobile data coverage in Davos.

- SPA Health Questionnaire

For your health, we need to know the most important key data for a SPA treatment. You decide how long the data is stored and can adjust it at any time together with our staff. We use the "TAC" system for this purpose, for which you can find the data protection regulations [here](#). The data collected is stored in the hotel itself and is not connected to the Internet.

- Vouchers

For the purchase of vouchers, you will be connected to the platform of "E-Guma". You can find the data protection regulations of this provider [here](#).

- Digital Signage

In the banquet area, we work with the guest information system of "at-vision". The data protection regulations for at-vision are linked [here](#).

- Social Media

We also use social media platforms for interactions. These essentially include the platforms "Facebook", "Instagram", "LinkedIn" and "YouTube".

The data protection provisions of these platforms can be found as follows:

[Facebook, data protection regulations of Meta](#)

[Instagram; data protection regulations of Meta](#)

[LinkedIn; privacy policy](#)

[YouTube: Privacy Policy](#)