

ANNEX 2 - LIST OF PERSONAL DATA PROCESSING ACTIVITIES

In What Context Is Your Personal Data Collected?	What Personal Data May We Collect About You?	How and Why Do We Use Your Personal Data?	What Is Our Legal Basis for Processing Your Personal Data?
Hospitality Venue Reservation: Personal data collected when you reserve accommodation or services at one of our Hospitality Venues (e.g., guest house, SPA, restaurant), regardless of the booking channel used (e.g., website, call center, directly at the venue, or through a third-party travel agent)	- Contact details: name and surname, title, email address, phone number - Reservation details: venue name, stay/service dates, room or service type, rate, meal plan, booking channel - Personal preferences: room preferences (e.g., smoking/non-smoking, bed type), dietary or accessibility needs, travel companions	To: - Enable you to reserve accommodation or services at your selected Hospitality Venue - Verify availability and manage your reservation - Guarantee and confirm your booking - Send you communications regarding your reservation or related services - Personalize your stay or visit where applicable - Facilitate cancellations, modifications, or changes to your booking - Generate and send invoices and receipts - Manage, process, and settle payments, including fees in the event of a no-show - Maintain internal accounting records and ensure financial reporting accuracy - Conduct analytics and compile statistics to support revenue management and service improvement	- Performance of a contract: to create, manage, and fulfill your reservation - Your consent: to personalize your experience and store preference information - Legitimate interests: to improve service offerings, manage operational efficiency, and enhance guest engagement
Check-In and Check-Out at a Hospitality Venue: Personal data collected when you check in or check out of a guest house or similar Hospitality Venue	- Contact details: name and surname, title, email address, phone number, residence address - Biographical information: birthdate, state of residence, citizenship and its type, language - Billing/financial information: payment verification data - Identification documents: ID document type, series, number, issuing state, date of expiry, scanned copies of ID document (if required by law) - Vehicle information: car registration number, if the guest arrives with a vehicle	To: - Verify your identity and that of any accompanying guests - Register your arrival and departure - Issue room keys (physical or mobile) - Secure a payment guarantee or deposit - Create or update your guest profile in our property management system - Assess eligibility for upgrades and apply them where applicable - Process payments related to your stay - Generate and send invoices and receipts - Invite you to use online check-in and check-out functionalities - Monitor your stay to manage credit limits and avoid overcharges - Record and respond to on-site incidents, emergencies, or complaints - Monitor common areas via CCTV for safety and	- Performance of a contract: to facilitate your check-in/check-out and deliver the services booked - Legal obligation: to process ID information and respond to lawful requests from public authorities - Your consent: to customize your experience and send check-in/check-out notifications - Legitimate interests: to ensure guest safety, prevent fraud, manage risks, and improve guest services

		security purposes - Conduct analytics to forecast occupancy rates and enhance operational efficiency	
During Your Stay at a Hospitality Venue: Personal data collected throughout your stay at a guest house, SPA, restaurant, or similar hospitality venue	- Health-related data: dietary requirements, food allergies, mobility limitations, or disabilities (special category data) - Personal preferences: hobbies, interests (e.g., preferred newspapers/magazines, sports activities, cultural preferences, food and beverage choices) - CCTV recordings (video): captured in public and common areas - CCTV recordings (video and audio): captured in the reception and bar service areas	To: - Provide basic hospitality services (e.g., room cleaning, maintenance, restocking the minibar) - Provide specialized guest services (e.g., SPA treatments, in-room service, laundry services, valet parking, taxi reservations) - Personalize your experience and tailor services to your preferences during your stay - Perform operational analysis and prepare reports to improve services, operational efficiency, and revenue management - Ensure the health, safety, and security of guests, visitors, and staff, including through the use of video surveillance and audio recording in designated areas; - Assist in preventing, detecting, and investigating criminal, fraudulent, or other illegal activities; - Address complaints, disputes, and claims, and protect the company's legitimate interests	- Performance of a contract: to provide the services and accommodation you have requested during your stay - Legitimate interests: to ensure the safety of guests, visitors, and employees; to protect property; to prevent and investigate incidents; to address complaints and disputes; and to protect the company's legal interests - Your explicit consent: when processing health-related or other special categories of personal data that you voluntarily provide to ensure dietary requirements, accessibility needs, wellness services, or other requested accommodations - Protection of vital interests (where applicable): to protect your life or health or that of another person in emergency situations, including cases involving severe allergies or other health risks
Satisfaction Surveys: Personal data collected when you complete a satisfaction survey either during or after your stay at a hospitality venue	- Contact details: name, title, email address, phone number - Reservation information: venue name, dates of stay, meal plan, rate details - Feedback content: comments, opinions, ratings, and suggestions voluntarily provided in survey responses	To: - Evaluate the quality of services provided and identify opportunities for improvement - Respond to guest feedback and address concerns in real time where feasible - Analyze trends and expectations to enhance future guest experiences and offerings - Strengthen guest engagement and loyalty through continuous service refinement	- Legitimate interests: to assess guest satisfaction, improve service quality and operational standards, and build and maintain a strong brand reputation
Complaints Handling: Personal data collected when you submit a complaint regarding your stay or experience through any communication channel (e.g., online form, email, call center, or social media)	- Contact details: name and surname, title, email address, phone number, and social media handle - Reservation information: dates of stay, meal plan, rate - Stay details: check-in and check-out times, in-room call records, Wi-Fi usage data, food and beverage consumption (e.g., restaurant, bar,	To: - Investigate, address, and resolve your complaint - Improve our services, identify operational issues, and enhance the overall guest experience	- Performance of a contract: to respond to and manage your complaint - Legitimate interests: to monitor service quality, address guest concerns, and improve customer satisfaction and brand reputation

	minibar) - Additional information: any other details you voluntarily provide during the complaint process		
Meetings and Events: Personal data collected when you inquire about or arrange a meeting, conference, or event at one of our Hospitality Venues	- Contact details: name and surname, title, address, email address, phone number - Biographical information: birthdate, language, employer details, and professional role (for business-related bookings) - Event details: information necessary to plan and deliver the meeting or event (e.g., venue, date, number of participants, special requests, technical or catering needs)	To: - Communicate with you regarding the planning, organization, and delivery of the meeting or event, including providing proposals, quotes, and logistical details - Create and maintain a customer profile to support current and future event arrangements	- Performance of a contract: to manage your inquiry and facilitate the organization of your meeting or event - Legitimate interests: to streamline event management, improve service delivery, and enhance client relationship management
Newsletter and Marketing Subscription: Personal data collected when you subscribe to receive marketing communications via email or other channels	- Contact details: name, email address, phone number	To: - Send you marketing communications, including newsletters, promotional offers, and product updates (if you've subscribed) - Personalize marketing content based on your preferences and profile - Maintain an up-to-date suppression list if you opt out of marketing communications - Conduct analytics to assess the effectiveness of marketing campaigns and improve targeting	- Your consent: to send you marketing communications tailored to your interests and preferences - Legal obligation: to maintain suppression lists and comply with data protection laws - Legitimate interests: to improve our marketing efforts and enhance user engagement
Online Browsing and Use of Our Mobile App (if available): Personal data collected when you browse our website, use our mobile app (if available), or interact with us on third-party websites/apps that deploy cookies, pixels, or similar technologies	- Technical Information: IP address, browser type, device type, and operating system - Usage Data: source of arrival, login details, approximate location, browsing behavior (e.g., pages viewed, clicks/taps, scroll or mouse movements—non-identifying), time spent on pages, hotels or destinations searched or selected	To: - Maintain security and manage access to our systems, website, and mobile app (if available) - Collect insights into how you interact with our platforms to personalize communications and improve user experience - Measure the performance and effectiveness of our services, website, and mobile app (if available) - Maintain up-to-date systems and data security measures - Ensure core technical functionality of our website and mobile app (if available) - Tailor our services and communications to your interests and preferences (e.g., recommend hotels or destinations, personalize ads or	- Legitimate interests: to improve our digital platforms, personalize your experience, engage with you more effectively, prevent fraud, and ensure platform security - Your consent: to store and retrieve cookies, pixels, and other similar tracking technologies on your device (as required by applicable law)

		content) - Deliver targeted advertising across third-party platforms based on your profile and past browsing behavior - For more details, refer to our Cookies Policy	
User Generated Content: Personal data collected when you submit or share content (e.g., images, testimonials, reviews) via our website, mobile app (if available), social media platforms, or other media platforms; or when you give us permission to re-use content you originally posted on social media	- Contact Details: name or alias, email address, phone number - Biographical Information: birthdate, language, and photograph - Social Media Information: social media handle, account ID, profile photo, content posted, associated sentiment, and any publicly visible comments	To: - Publish or share the content you submitted or approved for reuse - Promote our brand and services using the submitted content, including testimonials, reviews, or images - Use your content in accordance with specific terms you accepted (e.g., for marketing, advertising, or internal publications)	- Your consent: to use and share the content you created and made available, including reposting on our official channels or in promotional/informational materials
Enquiries: Personal data collected when you contact our customer care, reservations team, or account management to ask questions about our guest houses, services, your bookings, membership account, or your rights	- Contact Details: name and surname, title, mailing address, email address, phone number - Additional Information: any other personal data you voluntarily share with us during your enquiry, including the content of your question, preferences, or specific concerns	To: - Respond to and manage your questions, requests, or concerns - Log your enquiry and link it to your guest profile to better understand your needs and provide personalized support - Run internal analytics and generate statistics to monitor service quality and improve customer support	- Performance of a contract: to respond to and fulfill your enquiry, especially when related to a reservation or account - Legitimate interests: to improve our products and services, to better engage with you, to prevent fraud or criminal activity
Telephone Calls with the Customer Care Center: Personal Data collected when you contact our customer care center by telephone	- Contact details: name, surname, telephone number (where available), reservation number, or other information required to identify you - Telephone call data: audio recording of the telephone call (where the call is recorded), call date, time, duration, and other technical information related to the call - Additional information: any other information you voluntarily provide during the telephone call	To: - Respond to your questions and requests - Process reservations, reservation amendments, or cancellations - Ensure the quality of customer care and staff training - Handle complaints, claims, and disputes - Protect your and our rights and legitimate interests - Prevent, detect, and investigate fraudulent or other unlawful activities - Monitor and improve customer care processes and service quality	- Performance of a contract: to provide the requested information or services and to process your reservation or other request - Legitimate interests: to ensure the quality of customer care, protect your and our rights and legitimate interests, handle complaints and disputes, and prevent, detect, and investigate fraudulent or other unlawful activities
Contests and Sweepstakes: Personal data collected when you participate in a contest or sweepstake (if any) either online or at one of our Hospitality Venues	- Contact details: name, title, email address, phone number - Additional information: any personal information you voluntarily provide as part of your participation in	To: - Enable you to participate in the contest or sweepstake - Manage the contest or sweepstake, including winner selection, notification, and prize delivery	- Your consent: to allow you to participate in the contest or sweepstake

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	the contest or sweepstake (e.g., answers to questions, choices, etc.)		
Social Media Platforms: Personal data collected from your activity on social media platforms and online review sites	- Social media information: your social media handle name, account number, profile photo, sentiment, and any publicly available comment made (e.g., on platforms like Facebook, Instagram, or Twitter) - Additional information: any information publicly provided by you, such as online reviews concerning our services	To: - Address your questions or complaints regarding our services - Monitor our online reputation and public sentiment - Improve our services and identify opportunities for improvement based on feedback - Engage with you on social media platforms regarding our products and services	- Legitimate interests: to improve our products and services, to better engage with you, to monitor our brand image and reputation, to identify trends and areas for service improvement
SPA Reservation, Treatment Booking, and Service Delivery: Personal Data collected when you book or participate in SPA services at our Hospitality Venues, whether online, by phone, or in person, including services such as massages, beauty treatments, wellness consultations, and other therapeutic sessions. Data may also be collected during your stay for ongoing treatments or wellness programs.	- Contact details: name, title, email address, phone number - Reservation details: appointment date/time, service type, therapist preference - Health-related data: relevant medical history, allergies, injuries, mobility limitations (special category data) - Billing/financial information: payment verification data	To: - Book and manage your SPA appointment - Personalize treatments based on health information and preferences - Process and confirm payments - Send appointment reminders and relevant communications - Maintain internal accounting and service quality monitoring - Ensure safety and adapt treatments to health needs	- Performance of a contract: to book and provide SPA services - Explicit consent: to process health-related data for personalized care - Legitimate interests: to improve services, operational management, ensure safety and service quality
Restaurant Reservation, Dining Experience, and Related Services: Personal Data collected when you reserve a table or dinner at one of our Hospitality Venues, whether through our website, by phone, via a third-party booking platform, or directly onsite. Data may also be collected during the meal service to accommodate specific dietary preferences or special requests.	- Contact details: name, title, email address, phone number - Reservation details: date, time, number of guests, seating preferences - Personal preferences: dietary restrictions, allergies, food/beverage preferences - Billing/financial information: payment verification data	To: - Manage and confirm your dining reservation - Personalize menu options based on dietary requirements - Provide high-quality customer service and hospitality - Facilitate payments, billing, and receipts - Perform analytics for service improvements and customer satisfaction tracking	- Performance of a contract: to manage your dining reservation and service delivery - Explicit consent: to process dietary or allergy information for personalized service - Legitimate interests: to improve operations, enhance guest experience, and manage customer relationships