General Data Protection Policy

Vienna House Hotelmanagement GmbH

We thank you for your interest in our company and website www.viennahouse.com. Vienna House Hotelmanagement GmbH, business address Dresdner Straße 87,1200, Vienna, Austria, FN 283788k, (hereafter "VIENNA HOUSE"), operates an online portal at "www.viennahouse.com" for its customers and interested parties. More information on VIENNA HOUSE can be found in the <u>Legal notice</u> to this page.

The information in this data protection policy applies to all data processing performed in the name of *VIENNA HOUSE* in our subsidiary hotels or hotels under our management, as well as to customer offers, reservation websites and newsletter services displayed on the online portal.

VIENNA HOUSE is part of a corporate group. *VIENNA HOUSE* also uses other affiliated companies on a collaborative basis to fulfil its extensive obligations. A list of hotels operated under the VIENNA HOUSE brand, which fall within the scope of this data protection policy can be found here. This list is regularly updated.

Subject of the information

This general data protection policy describes and explains our basic commitment to data protection and general security measures. We fulfil our legal data protection obligations via data protection policies created especially for the individual customer offers, which form an integral part of this data protection policy. More information and a link to the documents can be found below under "Data protection information according to customer offers".

Personal data is information that relates to an identified or identifiable natural person. Examples of such data include your name, date of birth, residential address, telephone number among others, that are transmitted to VIENNA HOUSE when registering and setting up your customer account.

Our customer groups are:

- Newsletter customer
 "Newsletter" data protection policy
- Online services
 "Online services" data protection policy
 Cookie information
- Guest booking
 "Guest booking" data protection policy
- Smartbooker Club
 Smartbooker Club data protection policy

Security measures

VIENNA HOUSE respects the privacy of the users of its website. It is very important to us that data that could lead to your identity being uncovered is provided with special protection. VIENNA HOUSE's goal is to always meet the expectations of our customers for our products and services. This also includes handling the data entrusted to us as part of the customer relationship with the greatest care and due diligence. We are obliged to protect your data in accordance with applicable data protection laws. This also applies with respect to our collaboration with partners and third parties.

This is why we are constantly working to review and improve our technical and physical safety rules. We have implemented security measures within an Information Security Management System – "ISMS" for short – by means of rules and precautions in order to protect your personal data against unintentional loss, misuse or changes on all websites and servers operated by *VIENNA HOUSE* while it is subject to our control.

We ensure compliance with legal data protection requirements through regular training sessions for our personnel and by subjecting our employees and commissioned external data processors in writing to maintain data confidentiality.

Minors

We do not intend to gather personal data concerning minors without authorisation; however, we cannot always verify the age of individuals who access and use our websites. If a minor transmits their data to us without the consent of their guardian, we ask their guardian to contact us so that we can delete said data and prevent the minor from being contacted by us (e.g. advertising material). Contact: office@viennahouse.com

Data protection information according to customer groups

We have created separate data protection policies for our customer groups to fulfil our obligations to provide information on data protection and to improve readability and transparency. Clicking on the links displayed for the customer group "*Data protection information*" will take the user to the associated document.

The customer group-specific data protection information provides detailed information on

- Who we are and how you can get in contact with us
- To which products the data protection information refers
- Which categories of personal data we process
- The sources from which we draw data
- The purposes for which we process personal data (including within the corporate group as a whole)
- The legal basis upon which we do this
- To whom we may pass personal data
- How long we store personal data
- The rights to which you are entitled with respect to the processed personal data

If it is stated in the data protection information that we perform data processing on the basis of your consent, this of course depends on you having issued your consent effectively. If there is no consent, we will not process data concerning your person that requires your consent.

Our online offerings (websites) can of course also be visited without providing any personal information. However, their use, also by registered users, involves the saving of

access data which is not personally identifiable (e.g. name of the Internet service

providers, the site visited by the user prior to visiting the website, the anonymised IP

address, date and time of the visit). You can find data protection information on this

type of data processing under "Cookie Information". This information also features

details on "social plug-ins" using which the content of our website can be shared with

other websites.

Contact

If you would like to update your data, how your data is used, your preferred

communication channel, or you would like to no longer receive any marketing

communications from VIENNA HOUSE, you can get into contact with us as follows:

By email:

office@viennahouse.com

By telephone:

+43-1-333 73 73 -0

By post:

Dresdner Straße 87, 1200 Vienna, Austria

If you have any comments or questions about data protection at VIENNA HOUSE, or our

data protection policies, you can contact us via the options listed below:

By email:

dataprivacy@viennahouse.com

By telephone:

+43-1-333 73 73 0

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