

## Privacy Policy

### 1. INTRODUCTION

This privacy policy governs the use of the website mentioned in Section 4 below, which is exploited by the corporation LECRANS SA, a swiss law company limited by shares, registered under IDE CHE-114.381.128 in the trade register of the Valais central, and having its registered seat at Chemin du Mont-Blanc 1, 3963 Crans-Montana.

By accessing our website, you are likely to provide us with data such as, without limitation: your name and surname (physical person), business name (legal person), your email address, and the IP address from which you connected to the Internet.

These data and their processing are protected by the Swiss Federal Law on Data Protection of June 19, 1992 (LPD) and, to the extent applicable, by the new EU General Data Protection Regulation (GDPR) entered into force on May 25, 2018.

Data protection is a key concern for us. Personal data may only be processed lawfully and its processing must be carried out in good faith and must be proportionate. Personal data may only be processed for the purpose indicated at the time of collection, that is evident from the circumstances, or that is provided for by law. This privacy statement is intended to help you understand how we may use the data you provide to us, or which may be collected, as a user of our site.

All content on the website mentioned in Section 4 is proprietary of the hotel, it is protected by law, including copyright, and may not be used or copied without the prior consent of the hotel.

### 2. LEGAL BASIS

This privacy policy is based on the Federal Data Protection Act (FADP) and the European General Data Protection Regulation (GDPR) entered into force on May 25, 2018.

### 3. UPDATE

Our privacy policy may require periodic updates, including as part of the evolving regulatory framework for data protection. We invite you to check this page regularly to make sure you have read the latest version.

Last update: January 2022

### 4. OUR SITE URL

<https://lecrans.com>

# LECRANS

## 5. DEFINITIONS

### **Personal Data**

Any information relating to an identified or identifiable natural person (data subject). In particular, identification may occur through an identifier such as the name, the first name or the address, the email, the telephone number, etc.

Examples of personal data that may be processed in the context of the use of our website are name, surname, date of birth, country of residence, address, employer, profession, nationality, gender, passport number, credit card number, IP address, location, email address, phone number, etc.

### **CMS**

CMS is the acronym for Content Management System. This is the system for managing the content displayed on a website.

### **Consent**

Consent means any freely given, specific, informed, and unambiguous indication of the data subject's by which he or she, by a statement or by a clear affirmative action (such as clicking on a website), signifies his or her agreement to the processing of his or her personal data.

### **Cookies**

A cookie is a text file that the site you are visiting stores on the hard disk or in the browser memory of the computer that you use to access the internet. A cookie allows your computer to store various technical data allowing the general control of public access to a site (number of visits, duration of the visit, connection to other sites, etc.) or the customization of the displayed pages for your next interactions with the same site (your account, the most visited pages, etc.)

### **Privacy Impact Assessment (PIA)**

A PIA is a detailed study to establish the risk to privacy that personal data processing could have on the privacy of the data subject should an incident occur.

### **Purpose of Processing**

The purpose of processing is the reason why the personal data is collected.

### **Plugins**

A plugin or plug-in is a computer program designed to add functionality to other software (called host software). For example, the buttons of social networks. Equivalent terms; "Plug-in", "Add-in", "Add on".

### **Data Subject**

Any natural person is subject to the processing of personal data.

### **Data Controller**

The controller is the natural person or legal person on whose behalf the treatment is carried out. It determines alone or jointly the purposes of the treatment.

# LECRANS

## Data Processor

The processor is any natural or legal person, public authority, service, or other body that processes personal data on behalf of the controller. For example, a web host or an online service provider.

## Tag

Tag or HTML tags are the basic elements of the HTML coding of a web page. They are invisible to the user (except by activating the display of the source code). They are interpreted by the browser for the composition of the page. They allow the formatting and structuring of content and some are specifically taken into account by the algorithms of search engines for setting the score of the page on a query and the return of results.

## Processing

Any transaction or set of transactions involving personal data, whether or not performed using automated processes, including the collection, recording, organization, retention, adaptation, modification extraction, consultation, use, communication by transmission, dissemination or any other form of provision, reconciliation or interconnection, and limitation, erasure or destruction.

## 6. PROCESSING YOUR DATA

We only process and collect data lawfully, notably, only those that you either (i) choose to transmit to us and for which you explicitly consent to the treatment or (ii) that are in the direct connection with the conclusion or the performance of a contract concluded between you and us.

### Contact Form

Through our website, you can fill out a generic contact form to obtain information on our services or ask general questions. Your request will be notified to one of our employees. The following personal data will be requested from you to use the contact form:

- Last name
- First Name
- E-mail address
- Phone number
- Country of residence

You have the opportunity to write a message related to your contact request, by doing so you consent to the processing of the above-mentioned personal data and other elements of your request (such as the content of your specific requests, smoking status, special diet, presence of pets, health-related information, etc...). We recommend that you remain concise in your message and not provide us with any personal information that is not directly necessary to the treatment of your request.

# LECRANS

## Newsletter

You can also choose to receive our newsletter by ticking the option provided for this purpose. You will then receive a request for consent by email which will clearly indicate the purposes of processing your personal data that you can alternatively accept or refuse.

If you have subscribed to our newsletter and do not wish to receive it anymore, you can at any time unsubscribe by clicking on the "unsubscribe" link at the bottom of the newsletter. By doing so, you will receive an automatic confirmation of unsubscription and your email address will be automatically deleted from the file provided for this purpose (our distribution list).

## 7. PURPOSES OF TREATMENT

We essentially treat your data in order to best meet your expectations and personalize our offer of services. We do not sell or otherwise commercially exploit in another fashion your personal data, nor make it available to third parties except in cases where we use subcontractors to process the data. Your data may be collected and/or stored in a digital manner or in the form of hard support.

In the collecting of your personal data, two purposes stand out:

### 1. Operational purposes

- Respond to requests for contacts or information
- Establishment of (an) offer(s)

### 2. Marketing purposes

- Sending newsletters or other information about the hotel
- Sending commercial offers

## 8. DURATION OF CONSERVATION OF PERSONAL DATA

Your data is safely stored in our systems for the time necessary for the intended treatment. After processing, the data is archived and it may be coded, anonymized, or destroyed.

## 9. TRANSFER OF YOUR DATA

To process your data, as well as for the maintenance and support of our IT systems, we may use qualified professional subcontractors (service providers) based in Switzerland and abroad.

When the servers of our subcontractors are located abroad we, as far as practicable, strive to ensure that they are located in a state whose data protection legislation is equivalent to the FADP and the GDPR and that our subcontractors apply organizational and technical measures consistent with the FADP and the GDPR.

We nevertheless and in spite of our efforts draw your attention to the fact that the servers of our subcontractors and/or data processors may be located in states where the local applicable legislation does not guarantee an adequate level of protection, as compared to the LPD or the

# LECRANS

GDPR most notably, the USA). As a consequence, the privacy of the data subject could be seriously endangered.

If this is the case, we ensure that our subcontractors and/or data processors, provide data protection safeguards and that they apply equivalent or LPD/GDPR-compliant standards, regardless of their geolocation or one of their servers.

## 10. DATA PROTECTION MEASURES

We strive to maintain a high level of security in the collection, processing, and retention of data by relying on appropriate organizational and technical measures and taking the necessary precautions regarding the nature of the personal data that you are likely to communicate to us or are likely to be collected. We consider the risks associated with their treatment in order to preserve the security of your data and preserve these in such a way that they are not altered, damaged, destroyed or that unauthorized third parties have access to it.

## 11. COOKIES & PLUGINS

Our website uses plugins and cookies that may automatically record information. Their use aims to make the use of the site more pleasant by improving its ergonomics from the data collected.

This data can also be used for statistical measurement, user behavior analysis, and geolocation analysis, in order to personalize our commercial offer.

When you browse our site, the computer you use will interact with a server that provides all the requested resources by automatically saving each operation to a specific file in which the computer used is identified by its IP address. This is how the browser that you use gives us some standard data, including the browser used and its features, the operating system of the computer, tablet or smartphone used, third-party sites (Facebook, LinkedIn, etc.) from which you may have logged in as well as the dates and times of access to our site.

This data and in particular the IP address from which you logged in do not allow us to identify you directly.

### **Marketing Analysis and Targeting Plugins**

Our site uses marketing analysis and targeting services. The data generated by the cookie about your use of the website, including your IP address is transmitted and stored on servers that may be located abroad, including in a country offering a lower level of data protection compared to Switzerland or the European Union. If this is the case, we ensure that our subcontractors and/or data processors, provide data protection safeguards and that they apply equivalent or LPD/GDPR-compliant standards, regardless of their geolocation or one of their servers.

The provider will use this information for the purpose of evaluating your use of the site, compiling reports on website activity, and providing other services relating to website activity and internet usage. The supplier is likely to communicate this data to third parties in case of a legal obligation or

# LECRANS

when these third parties process these data for their own account, including in particular the publisher of the site.

Our site uses the following analytics and advertising services:

- Smartlook de Smartsupp.com, s.r.o
- Google Tag Manager de Google Inc.
- Google Maps de Google Inc.

## Plugins of Social Networks

Our website uses social plugins ("plugins"). These plugins are marked with logos.

If you open a page of our website containing one of these plugins, your Internet browser then establishes a direct link with the servers of the social network concerned. The content of the plugin is directly transmitted by the social network concerned to your Internet browser and integrated into the web page.

By virtue of the inclusion of cookies on the pages of our site, the social network concerned is informed that you have consulted one or more pages of our website. If you are connected to a social network when you visit our site, it is able to attribute your visit to our site to your account at home. If you interact with plugins, eg. By clicking on the "Like" button or by entering a comment, the corresponding information is sent directly by your Internet browser to the social network and saved on their servers.

To know the purposes and scope of the collection and processing of data by the social networks of which you are a member, as well as your rights in this area and the possibilities of setting up your account to protect your privacy, we recommend that you consult their privacy policy.

The following social plugins are installed on our site:

- Instagram.com from Instagram Inc.
- Facebook.com from Facebook Inc.

## 12. THIS MEANS YOU HAVE TO CONTROL YOUR TRACES

You have the option to disable plugins and cookies via the console provided for this purpose. This is accessible through the cookies banner that appears on the bottom of the home page when you visit our website. To customize or disable plugins and cookies, select the "customize" button.

Recent versions of the main browsers allow not only to oppose the registration of cookies but also to perform browsing sessions at the end of which all cookies installed during this session are automatically deleted regardless of their lifespan provided, thus providing better protection for traces.

# LECRANS

## 13. YOUR RIGHTS

### **Right of Information**

You have the right to be informed about your personal data, including the nature of the data and the purpose of the processing.

### **Right to Access Data**

You have the right to request access to your data at any time.

### **Right to Rectify Data**

You have the right to request the correction or updating of your data.

### **Right to Data Erasure (Right to be forgotten)**

Under the GDPR EU nationals can request the complete and definitive erasure of their data. In order to apply the measures that are most favorable to you, we extend this right to Swiss residents.

### **Right of Limitation of Data Processing**

You have the right to limit the processing of your data, particularly as regards the nature, purpose, and duration of processing.

### **Right to Portability of Data (transmitted to a third party on your instruction)**

Under the GDPR, EU nationals have the right to request that their data be passed on to third parties. In order to apply the measures that are most favorable to you, we extend this right to Swiss residents.

### **Right to Oppose Data Processing**

You have the right to oppose at any time the processing of your data.

### **Right not to be Subject to an Automated Individual Decision**

You have the right not to be subject to a decision resulting exclusively from automated processing that has legal effects that affect you or affect you significantly. Profiling is expressly included.

## 14. EXERCISE YOUR RIGHTS & INFORMATION, DATA PROTECTION OFFICER

You can exercise your rights or request information by contacting us via the email address [cornelia.destouches@lecrans.com](mailto:cornelia.destouches@lecrans.com) or by post to the address below. We will do what is necessary to answer you as soon as possible.

Data controller: Cornelia Destouches

Address: LeCrans Hotel, Chemin du Mont-Blanc 1, CP-179, Plans-Mayens, 3963 Crans-Montana, Switzerland