

Privacy Statement

This privacy statement ("Statement") applies to STAY HOSPITALITY GROUP Hotel Chain and all of its hotels and subsidiaries (collectively, "STAY" "we," or "us"). The security and privacy of your information are very important to us. Whether you are booking a room or are a member of one of our loyalty programs, we want you to trust us with managing and protecting the information that you have provided to us. We have prepared this statement to explain more about who we are and how we collect and manage your information. By using any of our products or services and/or by agreeing to this Statement, e.g., in the context of registering for any of our products or services or by any other means, you understand and acknowledge that we will collect and use personal data as described in this Statement.

1. Who we are and how can you contact us

STAY is the "Controller" for the purposes of EU General Data Protection Regulation ("GDPR").

Questions, comments, requests and complaints regarding this Statement and the information we hold are welcome and should be addressed to us at: info@staymars.com. All requests will be dealt with promptly and efficiently.

2. Information we may collect from you

We collect personal data from you voluntarily when you provide such personal data to us, or via our services with which you interact. We may also be given other personal data relating to you by other persons, or we may obtain such other personal data about you as may be provided to us in the course of our legitimate business activities. You do not have to provide us with your information although in some cases, if you do not, it may mean that you are unable to use our services. For example, we may be unable to complete any booking you may wish to make, or you may be unable to participate in our loyalty programs. In the course of providing services to you, we may collect and process data, including the following, which might contain your personal data (collectively "Personal Data"): your full name; your address; your email address; your phone number including mobile phone numbers; your nationality; details of your car registration number; details of your driving license; details of your passport; financial information about you, including your bank account details, credit card details, or other payment methods details; details of contracts you have entered with third parties for us to provide services to you; details of your relationship to other parties; details of your membership of professional or other organizations; your date of birth and/or anniversary; details of your children and other relations; medical details, including details of allergies and all other data which you ask us to process on your behalf, or which is necessary for us to process in order for us to fulfil our role as providing accommodation, gym, spa, leisure, retail or food-related services to you; any disabilities or other medical conditions disclosed to us in order to allow us to provide with appropriate service; media content you have watched or subscribed during your stay in our hotels. We may also use CCTV on our premises, to help us ensure the safety and security of both our staff and visitors. When you access our website or wi-fi facilities, your device's browser provides us with information such as your IP address, browser type, access time and referring URL which is collected and used to compile statistical data. This information may be used to help us to improve our website and the services we offer, and to offer services to you.

3. How we secure your information

We are committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access and use. However, the collection, transmission and storage of information can never be guaranteed to be completely secure. Yet, we take steps to ensure that appropriate security safeguards are in place to protect your information, and we will continue to revise policies and implement additional security features as new technologies become available.

4. The lawful basis for processing of your personal data

We will only collect, use and share your information after ensuring that we have an appropriate lawful basis to do this. Such lawful and legal basis can be any of the following:

4.1 Carry out our obligations arising from any contracts entered into between you and us. For example, making and managing your booking and operating and providing services in connection with any of our loyalty programs in accordance with the terms of our agreement with you;

4.2 Your consent for the process of your personal data;

4.3 our use of your information is necessary to meet responsibilities we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities;

4.4 our use of your information is in our legitimate interest as a commercial organization. For example, to operate and improve our services and to keep people informed about our products and services (including for profiling and targeted advertising). In these cases, we will look after your information at all times in a way that is proportionate and respects your privacy rights.

In any case in which you have provided your consent to our processing of your information, you can withdraw this consent at any time by contacting us through the contact details provided above.

5. Transfer and disclosure of Personal Data

We may disclose your personal data to third party service providers for the purpose of providing services to you, for example the processing and fulfillment of your booking. We may also disclose your personal data in other occasions in accordance with applicable law, e.g. when we have a legal obligation to do so, or when we are allowed to do so under our legitimate interests. In any such transfer we will take steps to make sure such transfer is carefully managed to protect your privacy rights:

5.1 transfers within our Group and affiliates will be subject to an agreement which contractually obliges each party to ensure that your data receives an adequate and consistent level of protection;

5.2 transfers to any subcontractor or processor will be subject to contractual terms ensuring the security and protection of any personal data, in accordance with applicable law provisions;

5.3 any transfer of data which originates in the European Union ("EU") to a country outside of the European Economic Area (EEA), shall be made in compliance with the provisions of chapter 5 of the GDPR, and the legal safeguards included there. Such transfer can be made to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights, as like the EU-US Privacy Shield; any requests for information we receive from law enforcement or regulators will be carefully validated before the disclosure of any Personal Data.

6. Links to other sites

Our website may contain links to and from other websites. If you follow such a link to any of those websites, please note that those websites have their privacy statements and that we do not accept any responsibility or liability for those statements. We encourage you to review the privacy statements of these third-party websites as their privacy practices may differ from ours.

7. Retaining your information in our systems

We generally only keep your information for as long as is reasonably required for the reasons explained in this privacy statement. We maintain a data retention policy which we apply to all the records we hold, ensuring minimization of retention periods. In some cases, we keep transactional records (which may include your personal data) for long periods if it is necessary to meet legal, regulatory, tax or accounting needs. We will also retain information if we reasonably believe there is a prospect of litigation.

8. Your rights under EU data protection laws - GDPR

As an individual, under EU law you have certain rights to apply to us to provide information or make amendments to how we process data relating to you. These rights apply in certain circumstances and are set out below:

8.1. right to access your personal data - you can ask us to confirm whether or not we have and use your personal data, and if so, you can ask for a copy of your data;

8.2. right to correct your personal data - you can ask us to correct any of your personal data which is incorrect, after verifying the accuracy of the data first;

8.3. right to erase your personal data - you can ask us to erase your personal data if you think we no longer need to use it for the purpose we collected it from you. you can also ask for such erasure in any case in which the process of your data was based on your consent, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data. any request for such erasure will be subject to our obligations under the law (e.g. our obligation to keep some records for tax or customs purposes);

8.4. right to restrict our use in your personal data - you can ask us to restrict our use of your personal data in certain circumstances;

8.5. right to object to how we use your personal data - you can object to any use of your personal data which we have justified by our legitimate interest if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information;

8.6. you can require us to refrain from using your data for direct marketing purposes;

8.7. you can ask us to transfer your information to another organization and/or provide you with a copy of your personal data. We may not always be able to do what you have asked, for example, if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way. However, we encourage you to contact us with any such request, and we will be happy to assist you.

9. Changes to this Privacy Statement

We reserve the right to change this statement from time to time at our sole discretion. If we make any changes, we will post those changes here so that you can see what information we gather, how we might use that information and in what circumstances we may disclose it. By continuing to use our site or our services or otherwise provide data after we post any such changes, you accept and agree to this statements as modified.

10. Notwithstanding all the above, the user agrees and acknowledges that the information provided by him to the company or to 3rd party websites and softwares, may be collected, gathered, used and disclosed to the company and third party software and services that allow the company to manage hotel operations (like PMS software) collect payments and accept online reservations.