

## **PRIVACY STATEMENT**

Effective Date: May 2018

This Privacy Statement applies to [www.studios-meliton.gr](http://www.studios-meliton.gr) owned and operated by Top Studios. This Privacy Statement describes how we collect and use the information, which may include personal data, you provide on our web site: [www.studios-meliton.gr](http://www.studios-meliton.gr). It also describes the choices available to you regarding our use of your personal data and how you can access and update this data. Time to time we may update our privacy policy so you are advised to check our privacy statement often in order to stay actually informed.

**Top Studios, strictly following the principles of personal data protection provided by relevant laws and international conventions, will not make any unlawful and unlicensed use of the information you have entered. Our company in no way reveals, publishes, sells, exchanges personal information and information you trust us. Exceptionally, your personal data may be disclosed by the company, subject always to the statutory procedure when required by a Public Authority, a court, etc. You may also, at any time, make any changes to the personal information you have given us limit or cancel the use of any of these items by completing the relevant online form.**

### **Data Collection**

The types of personal data that we collect include:

- Your first name, last name, email address, phone number and home address;
- Company name, VAT number and other tax information. Profession in case of invoice
- Credit card details (type of card, credit card number, name on card, expiration date and security code);
- Guest stay data, including date of arrival and departure, special requests made, observations about your service preferences (including room preferences, facilities or any other services used);
- Data you provide regarding your marketing preferences or in the course of participating in surveys, contests or promotional offers;

When you use our website, we also collect information automatically, some of which may be personal data. These include items such as language settings, IP address, location, device settings, device operating system, activity details, time of use, redirect URL, status report, user information (version information the browser, the browser, the browsing history, the user code on the Booking, the kind of data you've seen. We may also collect data through cookies. If, on the basis of these data, you are identified as a natural person, such data is considered to be personal data subject to this privacy policy.

You may always choose what personal data (if any) you wish to provide to us. If you choose not to provide certain details, however, some of your transactions with us may be impacted.

### **Processing Purposes – Why we collect and share your personal data**

We use your personal data for the following purposes:

- A. Reservations: We use your personal data to complete and administer your online reservation.
- B. Customer service: We use your personal data to provide customer service.
- C. Guest reviews: We may use your contact data to invite you by email to write a guest review after your stay. This can help other travellers to choose the accommodation that suits them best. If you submit a guest review, your review may be published on our website.
- D. Marketing activities: We also use your data for marketing activities, as permitted by law.
- E. Other communications: There may be other times when we get in touch by email, by post, by phone or by texting you, depending on the contact data you share with us. There could be a number of reasons for this:
  - a. We may need to respond to and handle requests you have made.
  - b. If you have not finalized a reservation online, we may email you a reminder to continue with your reservation. We believe that this additional service is useful to you because it allows you to carry on with a reservation without having to search for the accommodation again or fill in all the reservation details from scratch.
  - c. When you use our services, we may send you a questionnaire or invite you to provide a review about your experience with our website. We believe that this additional service is useful to you and to us as we will be able to improve our website based on your feedback.
- F. Legal and compliance: In certain cases, we need to use the information provided, which may include personal data, to handle and resolve legal disputes or complaints, for regulatory investigations and compliance, or to enforce agreement(s) or to comply with lawful requests from law enforcement insofar as it is required by law.
- G. Security, fraud detection and prevention: We use the information, which may include personal data, in order to prevent fraud and other illegal or infringing activities. We also use this information to investigate and detect fraud
- Improving our services: Finally, we use personal data for analysis purposes. This is in the context of our pursuit of improving our services and user experience as well as improving the functionality and quality of our online travel services.  
If we use automated means to process personal data which produces legal effects or significantly affects you, we will implement suitable measures to safeguard your rights and freedoms, including the right to obtain human intervention.

#### Legal Bases

- We rely on the performance of a contract: The use of your data may be necessary to perform the contract that you have with us. For example, if you use our services to make an online reservation, we will use your data to carry out our obligation to complete and administer that reservation under the contract that we have with you.

- We rely on its legitimate interests: We use your data for our legitimate interests, such as providing you with the best appropriate content for the website, emails and newsletters, to improve and promote our products and services and the content on our website, and for administrative, fraud detection and legal purposes. When using personal data to serve our legitimate interests, we will always balance your rights and interests in the protection of your information against our rights and interests.
- We rely on your Consent: We may rely on your consent to use your personal information for some direct marketing purposes. You may withdraw your consent at any time by contacting us at the addresses at the end of this Privacy Policy.

### **Data Sharing**

- Booking.com: We have teamed up with Booking.com B.V., located at Herengracht 597, 1017 CE Amsterdam, The Netherlands ([www.booking.com](http://www.booking.com)) (hereafter Booking.com) to offer you our online reservation services. While we provide the content to this website and you make a reservation directly with us, the reservations are processed through Booking.com. The information you enter into this website will therefore also be shared with Booking.com and its affiliates. This information may include personal data such as your name, your contact details, your payment details, the names of guests traveling with you and any preferences you specified when making a booking. To find out more about the Booking.com corporate family, visit [About Booking.com](#). Booking.com will send you a confirmation email, a pre-arrival email and provide you with information about the area and our accommodation. Booking.com will also provide you with international customer service 24/7 from its local offices in more than 20 languages. Sharing your details with Booking.com's global customer service staff allows them to respond when you need assistance. Booking.com may use your data for technical, analytical and marketing purposes as further described in the [Booking.com Privacy Policy](#). This includes that your data might also be shared with other members of the Booking Holdings Inc. group of companies for analysis to provide you with travel-related offers that may be of interest to you and to offer you customised service. If needed under applicable law, Booking.com will first ask your consent. If your data is transferred to a country outside the European Economic Area, Booking.com will make contractual arrangements to ensure that your personal data is still protected in line with European standards. If you have questions about the processing of your personal data by Booking.com, please contact [dataprotectionoffice@booking.com](mailto:dataprotectionoffice@booking.com).
- BookingSuite: Your personal data may be shared with BookingSuite B.V. located at Herengracht 597, 1017 CE Amsterdam, the Netherlands, the company which operates this website and the website [suite.booking.com](http://suite.booking.com). BookingSuite will provide your information which may include personal data to Booking.com for the purposes described above.
- Third-party service providers: We use service providers to process your personal data strictly on our behalf. This processing would be for

purposes as included in this Privacy Statement such as facilitating reservation payments, sending out marketing material or for analytical support services. These service providers are bound by confidentiality clauses and are not allowed to use your personal data for their own purposes or any other purpose.

- Competent authorities: We disclose personal data to law enforcement and other governmental authorities insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud.

### **Data Retention**

We will retain your information, which may include personal data for as long as we deem it necessary to provide services to you, comply with applicable laws, resolve disputes with any parties and otherwise as necessary to allow us to conduct our business including to detect and prevent fraud or other illegal activities. All personal data we retain will be subject to this Privacy Statement. If you have a question about a specific retention period for certain types of personal data we process about you, please contact us via the contact details included below.

### **Applicable security procedures to ensure personal data protection**

In accordance with applicable data protection laws, we use reasonable procedures to prevent unauthorized access to and abuse of your personal information. We use appropriate business systems and procedures to protect and safeguard the personal data we have in our possession. We also apply security, technical and physical limitations to access and use personal data on our servers. Only authorized personnel are allowed to access personal data during their work.

The transfer of personal data as described in this Privacy Policy may involve the transfer of personal data abroad to countries whose data protection laws are not as complete as those of the European Union. Where required by European law, we will transfer personal data only to recipients offering an adequate level of data protection. In such cases, we will make the necessary contractual arrangements to ensure that your personal data is still protected in accordance with European standards. You can ask to see a copy of these terms using the following contact details.

### **Your choices and rights**

We want you to be in control of how your personal data is used by us. You can do this in the following ways:

- You can ask us for a copy of the personal data we hold about you;
- you can inform us of any changes to your personal data, or you can ask us to correct any of the personal data we hold about you;
- in certain situations, you can ask us to erase or block or restrict the processing of the personal data we hold about you, or object to particular ways in which we are using your personal data;
- in certain situations, you can also ask us to send the personal data you have given us to a third party.

Where we are using your personal data on the basis of your consent, you are entitled to withdraw that consent at any time subject to applicable law.

Moreover, where we process your personal data based on legitimate interest or the public interest, you have the right to object at any time to that use of your personal data subject to applicable law.

We rely on you to ensure that your personal data is complete, accurate and current. Please do inform us promptly of any changes to or inaccuracies of to your personal data by contacting [meliton@studios-meliton.gr](mailto:meliton@studios-meliton.gr). We will handle your request in accordance with the applicable law.

If you have questions or concerns about our processing of your personal data, or if you wish to exercise any of the rights you have under this notice, you are welcome to contact us via [meliton@studios-meliton.gr](mailto:meliton@studios-meliton.gr). You may also contact your local data protection authority with questions and complaints.

**Who is responsible for processing your personal data?**

Studios Meliton, PORTO KOUFO, SITHONIA, HALKIDIKI, PC 63072. If you have any suggestion or comment about this privacy statement, please send an email to [meliton@studios-meliton.gr](mailto:meliton@studios-meliton.gr).