

Introduction

WF Swiss Hospitality GmbH, Via dil Parc 3, CH-7018 Flims-Waldhaus ("we") value your privacy. This Privacy Policy demonstrates our commitment to ensure the privacy and confidentiality of your personal data or personal data of other individuals you provide to us ("**Personal Data**") when you use our website, book a stay or spa treatment with us or otherwise request our services or communicate with us.

By accessing our website, booking a stay or spa treatment or using our services and/or communicating with us via the website forms, email or other channels, you consent to this Privacy Policy. To the extent you provide us with Personal Data of individuals other than yourself (in particular, if you book for other guests or register additional guests), you assure us that such individuals have consented to and been provided with a copy of this Privacy Policy.

In case you should not agree to any part of this Privacy Policy, you must inform us and discontinue using our website and services. We shall then no longer be in a position to provide any further information or services to you.

Personal Data we collect

We collect Personal Data that you voluntarily provide to us, for example when you communicate with us via email or other channels, when you sign up for or ask us to send you newsletters or other materials, and when you sign up for an event or make a reservation request or confirm a booking.

The Personal Data we collect may include your name, contact details, date of birth, country of residence, citizenship, passport copies, credit card information, language preference, job title and business affiliations and content of communication with us. In some cases your Personal Data will be supplemented by information retrieved from public sources, such as online media or employer websites, for the purpose of confirming your current address or obtaining further information to enable us to effectively communicate with you and offer our services to you.

Purposes for processing your Personal Data

We use Personal Data for the purposes of managing our relationship with you and providing our services to you, as well as communicating with you, including to send you newsletters, invitations to events, promotions, pre-/post-arrival or departure emails, guest-related surveys, to maintain our list of contacts and to provide you with other information you may request from us.

We do not sell or otherwise make your Personal Data available to third parties without your prior consent or as we are required under applicable laws or regulations, although some of our suppliers may have access to certain Personal Data when they perform services on our behalf, mainly to maintain and support our IT systems.

Cookies, Tracking Tools and Social Media Buttons

Our website (www.waldhaus-flims.ch) ("**Website**") uses cookies. Cookies are very small files that are placed on your device when you visit the Website and are stored in your browser's temporary files. They are used for purposes such as analysing user behaviour, statistical evaluations and improving the usability of websites. You can force your browser to block cookies in your browser settings. Please refer to your particular Internet browser's Help function for respective details.

Google Analytics

We use Google Analytics, a web analysis service provided by Google LLC ("**Google**"), which may create pseudonymized user profiles and use cookies. The information generated by the cookie about your use of the Website is transmitted to Google's servers in the U.S., stored and processed there for us and may include the following:

- navigation path taken by a visitor to the Website;
- length of stay on the Website or sub-page;
- the sub-page on which the Website is exited;
- the country, region or city from which the Website is accessed;
- end device (type, version, colour depth, resolution, width and height of the browser window); and
- returning or new visitor.

Above information is used to evaluate the use of the Website, to compile reports on Website activities and to provide other services associated with the Website and Internet usage for the purpose of market research and tailoring the design of the Website to suit our needs and those of our users. This information may also be shared with third parties if required by law or if third parties are processing the information on our behalf.

The IP address communicated by your browser within the scope of Google Analytics will be anonymized and, according to Google, under no circumstances be associated with other data relating to the user.

Google is certified under both, the Swiss-U.S. Privacy Shield Framework and the EU-U.S. Privacy Shield Framework (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>) and thereby provides for an adequate level of data protection.

For instructions on how to prevent your data being processed by Google Analytics, see <http://tools.google.com/dlpage/gaoptout?hl=de>.

On-site Targeting

In order to provide you with personalised services and information on our Website, we use and analyse the data that we collect (including through cookies) about you when you visit the Website. The analysis

of your behaviour may result in the creation of a user profile. Your usage data will only ever be consolidated using pseudonyms; we never use non-pseudonymized Personal Data for purposes of on-site targeting.

Re-Targeting

We also use re-targeting technologies on our Website, whereby your pseudonymized user behaviour profile enables partner websites to offer you advertising that is individually tailored to your preferences. We use Google AdWords Remarketing, another service provided by Google, to display ads based on your use of previously visited websites. For this purpose, Google uses the so-called double-click cookie, which allows your browser to be recognised when you visit other websites. The information generated by the cookie about your visit to the Website (including your IP address) is again transmitted to a Google server in the U.S. and stored and processed there.

Google will use this information for the purpose of evaluating your use of the Website in terms of the advertisements to be displayed, to compile reports for the website operator on website activities and ads, and to perform other services associated with Website and Internet usage. Google may also share this information with third parties if required by laws or regulations or if third parties are processing this information on Google's behalf. However, Google will never associate your IP address with other Google data.

You can prevent re-targeting at any time by refusing or disabling the relevant cookies in the menu bar of your web browser.

Social Media Buttons

Our Website uses social media buttons containing links to third party social media sites, including Instagram, Facebook and Twitter ("**Social Media Sites**"). The respective buttons to connect to such Social Media Sites do not set cookies when our Website pages are loaded on your device. The Social Media Sites are not under our control and have each their own privacy policy describing the manner in which they process your personal data when you access their site. If you provide any personal data to any Social Media Sites or choose to communicate with us through our dedicated pages on Social Media Sites, the personal data you provide is processed and controlled by the privacy policies of respective Social Media Sites. We do not endorse or control and are not responsible for the privacy policies or practices of Social Media Sites. If you have any concerns or questions about the use of your personal data by Social Media Sites, please refer to their privacy policies and contact details provided therein.

Our basis for processing your Personal Data

When processing your Personal Data for the purposes described herein, we rely on your consent to this Privacy Policy, our legitimate interests in maintaining business-relationships and communicating with you, as a business contact, about our operations and our events and/or our performance of any contract or another ground for lawful processing of your Personal Data under applicable laws and regulations.

Protecting your Personal Data

We restrict the use and access to your Personal Data to those who have a need-to-know to provide you with our services or access to our website and/or to communicate with you. We employ appropriate technical and organizational measures to preserve the confidentiality and integrity of your Personal Data. We regularly review our security policies and procedures to ensure our systems are secure and protected.

Your choices and rights

We grant you all applicable individual data protection rights. In particular, to the extent provided by applicable data protection legislation, you may have the right to:

- know what Personal Data we process about you and to request a copy;
- to have incorrect or incomplete Personal Data affecting you corrected or completed;
- to delete your Personal Data; to object to certain Personal Data about you being processed;
- to request that processing be temporarily restricted in certain cases;
- to receive your Personal Data in a structured, commonly used and machine-readable format or have your Personal Data transferred to another data controller, where our processing is based on your consent or necessary for the performance of a contract with you and carried out by automated means; and
- to withdraw your consent, where our processing is based on your consent.

Please note that the restriction, objection or deletion of your Personal Data or withdrawal of your consent, as applicable, may mean we will no longer be able to provide our services or information described above or to communicate with you.

Retaining your Personal Data

We store your Personal Data only for as long as you are a prospective guest to us or as otherwise necessary for the purposes described in this Privacy Policy or as required under applicable laws or regulations or best practice retention requirements.

All business correspondence sent by email is archived for 10 years in encrypted form. The archived emails are automatically deleted after 10 years. Email data are stored in Switzerland.

Contacts

If you have any questions about how we process your Personal Data, please feel free to contact us at dataprotection@waldhaus-flims.ch.

In case you should be dissatisfied with our processing of your Personal Data, you may also contact our



EU representative, Mr. Stephan Ulrich via stephan.ulrich@simmons-simmons.com.

You may also contact the Swiss Federal Data Protection and Information Commissioner, the supervisory authority for data protection related matters in Switzerland or the responsible data protection supervisory authority in your country of residence if you reside in a member state of the European Economic Area.

June [●], 2020