

Responsible within the meaning of the Basic Data Protection Ordinance (DSGVO)  
Hotelbusiness Zug AG (nachfolgend –HBZ)  
vertreten durch den General Manager Stefan Gareis  
Industriestrasse 14  
CH-6302 Zug

We are pleased that you are using our HBZ websites (parkhotel.ch / citygarden.ch / cu-restaurant.ch / restaurant-baeren-zug.ch) and thank you for your interest in our services and products. The protection of personal data is very important to us. Therefore, please take note of the following information:

#### Collection, processing and storage of data

You can use our website without us collecting personal data from you. However, in order to make a reservation, purchase a voucher or to contact HBZ, personal data must be collected. This data is used without your express consent for any other use solely for the mentioned purposes. Furthermore, the use is only to the extent necessary for the specific purpose, e.g. room reservation, voucher purchase, Ticketing etc. Every time you access our website or download a file, log files are stored. These data cannot be assigned by us to specific persons. These data are not merged or compared with other data sources; the anonymized data records are also deleted after a statistical evaluation. Each data record consists of:

- the website from which the file was requested,
- the name of the file,
- the date and time of the request,
- the amount of data transferred,
- the access status (file transferred, file not found, etc.),
- a description of the type of web browser used,
- of the IP address.

Every time our websites are accessed and every time a file is retrieved, IP addresses are also recorded in a log file on the server and automatically stored. IP addresses can possibly allow conclusions to be drawn about the person of the user. Einstein neither carries out evaluations, nor does it use such data for its own advertising purposes, nor does it hold them available for use by third parties.

#### Use of cookies and Google Analytics

We use cookies to make visiting our website attractive and to enable the use of certain functions. These are small text files that are stored on your computer. Most of the cookies we use are deleted from your hard disk at the end of the browser session (so-called session cookies). Other cookies remain on your computer and enable us to recognize your computer on your next visit (so-called long-term cookies).

Google Analytics is provided by Google Inc, a company of the holding company Alphabet Inc, based in the USA. Prior to the transmission of the data to the Provider, the IP address will be reduced by activating IP anonymization on this website within the Member States of the European Union or in other countries party to the Agreement on the European Economic Area. The anonymous IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. In such cases, we provide contractual guarantees to ensure that Google Inc.

maintains an adequate level of privacy. According to Google Inc., under no circumstances will the IP address be associated with other data relating to the user.

Further information about the web analysis service used can be found on the Google Analytics website. Instructions on how you can prevent your data from being processed by the web analysis service can be found at <http://tools.google.com/dlpage/gaoptout?hl=en>.

## Newsletter

You will only receive our newsletter if you have expressly confirmed beforehand that we should activate it for you. This is done by the so-called double opt-in procedure. This means that before the first newsletter is sent, we will send you a confirmation e-mail asking you again whether you would like to receive our newsletter. If you confirm the contained link, we will send you our newsletter. We use personal data concerning the use of the newsletter, both for statistical purposes and for the optimized addressing of the reader in relation to information, products and services as well as advertising purposes of our company. The collected usage data e.g. click reactions, acknowledgements of receipt and read confirmations, will not be passed on to third parties or used for purposes other than those mentioned here. You can unsubscribe from the newsletter at any time free of charge via the link provided at the end of each newsletter. You can also contact us by e-mail or by post at the address given below. Your e-mail address and any data collected about user behavior will then no longer be used for the newsletter.

## Other applications / Websites / Chats

Our Websites may contain links, applications and/or other websites which are not under the control of HBZ. This Privacy Policy applies only to HBZ's services. HBZ is not responsible for the content of linked applications or websites and the processing of personal data within these offers.

## Booking on the website, by correspondence or by phone call

If you make bookings either via our website, by correspondence (e-mail or letter post) or by telephone call, we require the following data to process the contract:

- Salutation
- First and last name
- Postal address
- Date of birth
- Telephone number
- Language
- credit card information
- e-mail address

We will only use this data and other information you provide voluntarily (e.g. expected time of arrival, motor vehicle, preferences, comments) to process the contract, unless otherwise stated in this data protection declaration or you have given your separate consent. We will process the data in order to record your booking as requested, to make the booked services available, to contact you in case of ambiguities or problems and to ensure correct payment.

The legal basis of data processing for this purpose is the fulfilment of a contract pursuant to Art. 6 para. 1 lit. b DSGVO.

## Data processing for the fulfilment of legal reporting obligations

On arrival at our hotel, we may need the following information from you and your escorts:

- First and last name
- Postal address and canton
- Date of birth
- Place of birth
- Nationality
- Official identification card and number
- day of arrival and departure
- Room number

We collect this information for the fulfilment of legal reporting obligations, which result in particular from the hospitality industry or police law. Where we are required to do so by applicable regulations, we will forward this information to the appropriate police authority.

We have a legitimate interest in the fulfilment of the legal requirements within the meaning of Art. 6 para. 1 lit. f DSGVO.

Please also note the information on data protection of the respective provider.

## Use of editorial information and content

All content transmitted by you for the purpose of publication (user generated content) is used by us exclusively within our websites and, if applicable, other online-based communication channels of HBZ - e.g. Facebook or Instagram etc.), whereby we cannot prevent external third-party websites from accessing this content through links. Editorial messages can be posts within the social media (Facebook). We reserve the right to edit the content forwarded to us prior to publication, in particular to correct errors and formatting. Shortenings and changes in content will not be made, however, without prior consultation with you.

## Collateral

We store your data on specially protected servers in Switzerland. Access to this data is only possible for a few specially authorised persons who have access to the areas necessary for their work in order to provide technical, commercial or editorial support for the data. We take precautions to ensure the security of your personal data. Your data is conscientiously protected against loss, destruction, falsification, manipulation and unauthorized access or unauthorized disclosure.

## Information, correction, blocking or deletion of stored data

You have a right to free information about your stored personal data and, if necessary, a right to correction, blocking or deletion of this data. The same applies to the revocation of consent given to the storage of your data. In the event of a revocation or request for deletion, your data will be deleted accordingly. Excluded from this are data whose deletion conflicts with legal and/or contractual retention periods. Furthermore, data are excluded which are necessary for the formation, execution and processing of contracts or which must be stored for billing purposes. For information, blocking, deletion and correction requests regarding your data or the revocation of declared consents, please contact the contact indicated at the bottom of the website.

## Storage period

We only store personal data for as long as it is necessary to use the tracking services mentioned above and the further processing within the scope of our legitimate interest. We keep contractual data for a longer period of time, as this is prescribed by legal storage obligations. Storage obligations, which oblige us to store data, result from regulations concerning the right to report, accounting and tax law. According to these regulations, business communications, contracts concluded and accounting records must be kept for up to 10 years. If we no longer need this data to perform the services for you, the data will be blocked. This means that the data may then only be used for accounting and tax purposes.

## Note on data transmission to the USA

For reasons of completeness, we would like to point out to users residing or domiciled in Switzerland that monitoring measures are in place in the USA by US authorities, which generally allow the storage of all personal data of all persons whose data was transmitted from Switzerland to the USA. This is done without differentiation, restriction or exception based on the objective pursued and without an objective criterion that enables the US authorities to restrict access to the data and their subsequent use to very specific, strictly limited purposes that are capable of justifying the interference associated with both access to the data and its use. Furthermore, we would like to point out that there are no legal remedies available in the USA for the data subjects from Switzerland which would allow them to gain access to the data concerning them and to obtain their correction or deletion, or that there is no effective legal protection against general access rights of US authorities. We explicitly point out this legal and factual situation to the person concerned in order to make a correspondingly informed decision to consent to the use of his data.

Users residing in an EU Member State are advised that the US does not have an adequate level of data protection from the point of view of the European Union, partly because of the issues mentioned in this section. If we have explained in this privacy policy that recipients of data (such as Google) are based in the USA, we will ensure that your data is protected by our partners at an appropriate level, either by contractual arrangements with these companies or by ensuring that these companies are certified under the EU or Swiss-US privacy label.

## Information on the rights of the customer and contacts

You have a right to free information about your stored data and, if necessary, a right to correction, blocking or deletion of this data. If you have any further questions about the collection, processing or use of your personal data, please contact us. The same applies to information, blocking, deletion and correction requests regarding your personal data as well as to revocations of consents given.

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