



**Privacy statement of Relais de la Sarvaz SA**

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## **Privacy statement of Relais de la Sarvaz SA**

Please read the following conditions carefully. By using our services and products or visiting our website, you declare that you accept the following conditions.

Your trust is very important to us, which is why we take data protection very seriously and ensure appropriate security. It goes without saying that we comply with the legal provisions of the Federal Data Protection Act (DPA), the Ordinance on the Federal Data Protection Act (FDPA), the Federal Telecommunications Act (TCA) and any other data protection provisions of Swiss or EU law that may apply, in particular the General Data Protection Regulation (GDPR).

Mr Philippe Michellod runs the Relais de la Sarvaz SA hotel, campsite and restaurant in Saillon and is the operator of the [www.sarvaz.ch](http://www.sarvaz.ch) website. He is therefore responsible for collecting, processing and using your personal data and for ensuring that data processing complies with applicable data protection legislation.

So that you know what personal data we collect from you and for what purposes we use it, please read the information below carefully.

### **A. Data processing in connection with our website**

#### **1. Consultation of our website**

Please note that when you visit our website, our server does not record any technical data.

#### **2. Camping or hotel bookings on the website, by post or by telephone**

If you make a booking for a campsite or hotel via our website, by correspondence (email or post) or by telephone, we require the following data in order to fulfil the contract:

- title
- first name and surname
- address, postcode, town and country
- date of birth
- mobile phone number
- email address

We use this data, together with other optional information you provide (e.g. expected time of arrival, preferences, remarks), solely for the purpose of fulfilling the contract, unless otherwise stated in this privacy policy or unless you have given your separate consent. We will process this data in particular in order to enter your booking in accordance with your request, to provide the services booked, to contact you in the event of uncertainties or problems, and to ensure that payment is made correctly.

This data, together with other optional information (e.g. company name), is collected in order to provide you with direct, password-protected access to your basic data stored in our system. Here you can view your previous and current bookings or manage or change your personal data.

Your consent in accordance with Article 6(1)(a) GDPR forms the legal basis for the processing of data for this purpose.

### **3. Restaurant bookings on the website, by post or by telephone**

If you make reservations for a table in our restaurant via the Lunchgate AG Foratable website, by post (email or post) or by telephone, we require the following data in order to execute the contract:

- first name and surname
- telephone number
- e-mail address

We use this data, together with other optional information that you provide (e.g. estimated time of arrival, preferences, comments), solely for the purpose of fulfilling the contract, unless otherwise stated in this privacy policy or you have given your separate consent. We will process this data in particular in order to enter your booking in accordance with your request, to provide the services booked, to contact you in the event of uncertainties or problems, and to ensure that payment is made correctly.

The legal basis for the processing of data for this purpose is the performance of a contract in accordance with Article 6(1)(b) GDPR.

### **4. Cookies**

In many respects, cookies make your visit to our site easier, more pleasant and more useful. Cookies are files containing information that your web browser automatically saves on your computer's hard drive when you visit our site.

For example, we use cookies to temporarily store your selected services and information entered when you fill in a form on our site so that you do not have to enter it again when you consult a sub-page. Cookies can also be used to identify you as a registered user when you register on our site. This saves you having to log in again when you visit another sub-page.

Most web browsers automatically accept cookies. However, you can configure your browser so that it does not store any cookies on your computer or so that a message appears each time you receive a new cookie. The following pages explain how to configure cookie handling for the most commonly used browsers:

- Microsoft Windows Internet Explorer
- Microsoft Windows Internet Explorer Mobile
- Mozilla Firefox
- Google Chrome for desktop
- Google Chrome for mobile
- Apple Safari for desktop
- Apple Safari for mobile

Disabling cookies may prevent you from using all the features of our site.

## **5. Tracking tools**

### **a. General**

We use the Google Analytics audience analysis service to ensure that our website is properly presented and continually optimised. In doing so, we create pseudonymised usage profiles and use small text files stored on your computer ("cookies"). The information generated by the cookie about your use of this website is transmitted to the servers of the providers of these services, then stored and processed for us. In addition to the data indicated in section 1 below, we may receive the following information:

- the route taken by a visitor to the site,
- the duration of the visit to the site or page
- the page from which the visitor leaves the site
- the country, region or town from which access is gained,
- device (type, version, colour depth, resolution, width and height of the browser window) and repeat or new visitor.

The information is used to analyse the use of the website, to compile reports on website activities and to provide other services related to the use of the website and Internet for market research purposes and to adapt the presentation of this website. This information may also be passed on to third parties insofar as this is required by law or insofar as third parties are commissioned to process this data.

## **b. Google Analytics**

The provider of Google Analytics is Google Inc, an Alphabet Inc. holding company based in the USA. Before the data is transmitted to the provider, the IP address is abbreviated by activating IP anonymisation ("anonymizeIP") on this website within the Member States of the European Union or in other signatory states of the Agreement on the European Economic Area. Google will not associate the anonymised IP address transmitted by your browser within the framework of Google Analytics with any other data. In exceptional cases, the full IP address will be transmitted to a Google server in the USA and then abbreviated. In this case, we provide contractual guarantees that Google Inc. complies with an adequate level of data protection. Google Inc. does not associate the IP address with any other user data.

Further information on the web analytics service used can be found on the Google Analytics website. To find out how to prevent your data being processed by the web analytics service, please visit <http://tools.google.com/dlpage/gaoptout?hl=fr>.

## **B. Processing of data relating to your stay**

### **1. Processing of data to meet legal obligations to provide information**

When you arrive at our hotel, we need the following information about you and the people accompanying you:

- first name and surname
- postal address and canton
- date of birth
- nationality
- official identity document and number
- day of arrival and departure
- room number

We collect this information in order to meet our legal obligations to provide information, in particular under police and hotel legislation. Insofar as we are obliged to do so under the applicable provisions, we pass on this information to the competent police authority.

We have a legitimate interest pursuant to Art. 6 para. 1 let. f RGPD in fulfilling the legal requirements.

### **C. Data processing in connection with our customer relationship management system**

The personal data mentioned in the previous paragraphs is stored centrally in our system. The data contained in this system is processed for the purposes of managing customer relations and their stay and not for advertising purposes. We process your data in the CRM system in particular to fulfil our contractual obligations towards you. Our legitimate interest lies in fulfilling these obligations.

#### **1. Recording of services provided**

If you receive additional services as part of your stay (e.g. use of our pay-TV service), we record the purpose of the service and the date on which you received it for billing purposes. The processing of this data is necessary for the performance of your contract with us in accordance with art. 6 al. 1 let. b RGPD.

#### **2. Use of Wi-Fi**

10.1 When you use our Wi-Fi network, certain technical information may be collected automatically, such as your IP address, the duration of your session, the websites visited and the files downloaded. This information is collected in order to ensure the proper functioning of the network and to prevent any misuse.

10.2 We do not collect personally identifiable information, such as your name or e-mail address, when you use our Wi-Fi network.

10.3 We use the information collected when using Wi-Fi solely for the purposes of technical management of the network, security, improving our services and complying with legal obligations.

10.4 We do not share your Wi-Fi information with third parties unless this is necessary to ensure the proper operation of the network, to comply with legal obligations or if you have given your prior consent.

#### **3. Video surveillance**

11.1 In certain areas of our establishment (campsite), we use a camera system. These are for information purposes only (weather) and only film the landscape. No faces are recognisable.

11.2 Videos are not recorded.

11.3 Video recordings are not used for individual surveillance purposes.

#### **4. Rights of data subjects**

In accordance with the provisions of data protection legislation, you have the right to access your personal data collected in connection with the use of Wi-Fi and video surveillance, to request their correction or deletion, and to object to their processing. Please contact us at [info@sarvaz.ch](mailto:info@sarvaz.ch) to exercise your rights.

## **C. Storage and exchange of data with third parties**

### **1. Booking platforms**

If you make a reservation via a third-party platform (e.g. Booking.com), the operator of the platform in question will send us various items of personal information. In principle, this includes the data listed in section 5 of this privacy policy. We may also receive requests relating to your booking. We process this data in particular in order to process your booking in accordance with your request and to provide the services you have booked. The legal basis for processing data for this purpose is the performance of a contract in accordance with Article 6(1)(b) GDPR.

Finally, the platform operators may inform us of any disputes relating to a booking. In this case, they also send us data relating to the booking process, for which a copy of the booking confirmation may serve as proof that the booking has actually been completed. We process this data to protect and enforce our rights. We base this processing on our legitimate interest pursuant to Article 6(1)(f) GDPR.

Please also take note of the privacy policies of the respective suppliers.

### **2. Centralised storage and linking of data**

We store the data specified in sections 2-5 and 8-10 in a centralised electronic data processing system. Your data is then systematically recorded and combined for the purpose of processing your bookings and fulfilling the contractual services. To do this, we use software from [company name, address, country]. The processing of this data by the software is based on our legitimate interest under Article 6(1)(f) GDPR in customer-friendly and efficient management of customer data.

### **3. Storage period**

We only store personal data for as long as is necessary for the use of the above-mentioned tracking services and for further processing based on our legitimate interest. We retain contractual data for a longer period if this is required by legal retention obligations. The retention obligations that require us to retain data arise from the provisions relating to the right to notify the authorities, financial accounting and tax law. In accordance with these provisions, commercial communications, contracts concluded and accounting documents must be kept for up to 10 years. If we no longer need this data to provide our services, it will be blocked. This means that the data may only be used for accounting and tax purposes.

### **4. Forwarding of data to third parties**

We will only pass on your personal data if you have given your express consent, if we are under a legal obligation to do so or if this is necessary to enforce our rights, in particular to enforce our rights arising from the contractual relationship. We also pass on your data to third parties insofar as this is necessary for the use of the website and

the performance of the contract (including outside the website), in particular for processing your bookings.

Our web host Infomaniak, Rue Eugène-Marziano 25, 1227 Geneva, is a service provider to whom we transmit personal data collected via the website, or who has access or may have access to such data. The website is hosted on servers in Switzerland. The purpose of transmitting the data is to provide and maintain the functionality of our website. This processing is based on our legitimate interest under Article 6(1)(f) GDPR.

Lastly, we transmit your credit card details to the issuer and acquirer of your credit card when you pay by credit card on our site. If you choose to pay by credit card, you must enter all the necessary information. The legal basis for the transfer of data is the performance of a contract in accordance with Article 6(1)(b) GDPR. With regard to the processing of your credit card information by these third parties, please also read the general terms and conditions and the privacy policy of your credit card issuer.

Please also note the information in sections 7-8 and 10-11 regarding the transfer of data to third parties.

## **5. Transmission of personal data abroad**

We are also entitled to transfer your personal data to third-party companies (contracted service providers) abroad for the purposes of processing the data specified in this Privacy Policy. These companies are subject to the same level of data protection as we are. If the level of data protection in a given country does not correspond to the Swiss or European level, we will ensure by contractual means that the protection of your personal data corresponds to that of Switzerland or the EU.

## **6. Right to information, rectification, erasure and restriction of processing; right to data portability**

**Right to information:** You have the right to request free access at any time to your personal data stored by us if we process it. This gives you the opportunity to check what personal data we are processing about you and to confirm that we are using it in accordance with the applicable data protection regulations.

**Right of rectification:** You have the right to have inaccurate or incomplete personal data rectified and to be informed of the rectification. In this case, we will inform the data recipients concerned of the corrections made, unless this is impossible or involves a disproportionate effort.

**Right to erasure:** You have the right to have your personal data erased in certain circumstances. In particular cases, for example in the case of legal retention requirements, the right to erasure may be waived. In this case, if the conditions are met, the data may be blocked instead of deleted.

**Right to restrict processing:** You have the right to request that the processing of your personal data be restricted.



Right to data portability: You have the right to receive from us the personal data you have communicated to us, free of charge and in a readable format.

Right to object: You may object to the processing of your data at any time, particularly in the context of direct marketing (e.g. advertising e-mails).

Right of withdrawal: In principle, you have the right to withdraw your consent at any time. However, processing activities based on past consent will not become unlawful as a result of your withdrawal.

Right of appeal: You have the right to lodge a complaint with a competent supervisory authority, for example against the way in which your personal data is processed.

To exercise these rights, please send us an email to the following address: [info@sarvaz.ch](mailto:info@sarvaz.ch)

## **7. Data security**

We use appropriate technical and organisational security measures to protect your personal data stored by us against manipulation, partial or total loss and against unauthorised access by third parties. Our security measures are constantly being improved in line with technological developments.

You should always keep your access data confidential and close the browser window when you have finished communicating with us, especially if you are not the only person using the computer.

We also take data protection very seriously within our company. Our employees and the service providers we appoint are bound by confidentiality and data protection legislation.

## **8. Note on data transmissions to the United States**

For the sake of completeness, we inform users whose domicile or registered office is in Switzerland that the United States are subject to surveillance measures by the American authorities. These measures generally allow the recording of all the personal data of persons whose data has been transferred from Switzerland to the United States. This is done without any differentiation, limitation or exception based on the aim pursued and without any objective criterion making it possible to limit the access of the American authorities to the data and their subsequent use to very precise and strictly limited purposes likely to justify the harm involved in accessing and using this data. In addition, we would like to inform you that in the United States, for data subjects from Switzerland, there is no legal remedy enabling you to have access to data concerning you and to obtain its rectification or deletion, nor is there any effective legal protection against general rights of access by the American

authorities. We explicitly draw the attention of the data subject to this legal and factual situation so that he or she can make an informed decision on whether to consent to the use of his or her data.

Users domiciled in an EU Member State are advised that, according to the EU, the USA does not have an adequate level of data protection, particularly in view of the issues raised in this section. Insofar as we have explained in this privacy policy that certain data recipients (e.g. Google) are based in the United States, we will ensure, either through contractual arrangements with these companies or through their certification under the EU-US or Swiss-US Data Protection Shield, that your data is afforded a reasonable level of protection by our partners.

#### **9. Right to lodge a complaint with a supervisory authority responsible for monitoring data protection**

You have the right to lodge a complaint with a data protection supervisory authority.

***Last update: August 2023***