

## **UNIQUE HOTELS PRIVACY POLICY**

Unique Hotels understands the importance of your privacy and respect that you want to safeguard the use to which your personal information is put. Consequently, we make it a high priority to ensure that your personal information (including credit card details) remains secure and confidential and is used only for the intended purpose. In this privacy policy we explain how we collect data about you and the nature of that data, how we use that data, who that data may be sent to and how you can amend data you have submitted to us. Our privacy policy applies to your personal data supplied or collected from our website ([www.uniquehotels.co.il](http://www.uniquehotels.co.il)) or any other web page or website with the Unique Hotels branding) or from the Unique Hotels app and to personal data supplied or collected over the telephone, by e-mail, by fax or by letter.

### **The personal data we collect and how we collect it**

We may collect or be provided with, store and use the following kinds of personal information:

- your first and last name, telephone number, postal and e-mail address, fax number.
- information about your computer and about your visits to and use of our website including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation.
- if you make a reservation or purchase any items using a credit or debit card then we need the card number, cardholder name, expiry date and CVV number.
- your membership details, hotel preferences and travel experiences.
- any survey responses or feedback.

We may ask you for personal information in a variety of circumstances, for instance:

- when you make a hotel reservation or purchase something from our website or on the telephone or by e-mail, letter, or fax.
- when you register with us, subscribe to our newsletter, enter competitions, or register for promotions; or
- when you join the Unique Hotels loyalty programme, INVITED; or
- when you take part in surveys or provide us with feedback.

We may be provided with personal information by third parties in connection with a reservation at any of Unique hotels, for instance, by a travel agent you may use to make a reservation or by the Unique hotel in connection with your reservation or stay.

We may also collect personal information in the course of telephone calls to and from our office or reservation service which may be recorded or monitored for the purpose of quality control and for staff training. Call recordings will be maintained as long as reasonably necessary and will then be deleted. Any personal information obtained from you during the call will be treated in accordance with the provisions of this privacy policy.

## **Using your personal information**

Unique Hotels may use your personal data in a number of ways, set out below.

### **Reservations**

Unique Hotels provides an online reservations facility on the Unique Hotels website and a telephone facility for making reservations at Unique Hotels. In the course of making and fulfilling a guest reservation it is necessary for Unique Hotels to collect and use personal data which will be subject to our Reservations Privacy Policy.

### **Unique Traveler Membership Programme**

If you become a member of the Unique Traveler programme then it is necessary for Unique Hotels to collect and use personal data which will be subject to the privacy policy set out below.

If you are a member of Unique Traveler, you are responsible for keeping your password and user details confidential. Unique Traveler will not ask you for your password.

The essential personal data that Unique Traveler will collect and use for your Unique Traveler membership is your:

- Full name
- Email address
- Country of residence
- Phone number
- Date of birth

The optional personal data that you may be asked to supply to Unique Hotels includes your:

- Social media account linking
- Vacation preferences
- Affiliate programme information (Avios, Amex etc.)
- Information from surveys, reviews etc.

Unique Hotels may process and use any of Unique Traveler member's personal data:

- to communicate with the member, for example, to provide information relating to Unique Hotels products and services or regarding stays/post stays or to contact members for customer satisfaction queries.
- for marketing purposes which may include using a member's personal data for personalised marketing or research purposes in accordance with applicable laws, for example, to conduct market research and to communicate Unique Hotels products, services, or promotions.
- for such purposes as targeted marketing and improvement of Unique Hotels products or services. SLH may also create aggregate and statistical information based on a member's personal data. Profiling includes automated processing of a member's personal data for evaluating or predicting a member's personal preferences or interests in order to, for example, send members marketing message concerning products or services most suitable for members.

Some of Unique Hotel's products and services may be used to promote products or services of other companies. However, Unique Hotels does not disclose a member's personal data to such companies for their marketing purposes without a member's prior consent.

When making a booking request using a Reward Night Voucher Unique Traveler member will be asked to provide Unique Hotels with certain information including:

- the number of adults and perhaps their personal details
- the number of children, their ages and perhaps their personal details
- current contact details for the Invited member making the booking.

This information will only be used for the purposes of the booking and will be subject to Unique Hotels Reservation Terms and Conditions and the Reservations Privacy Policy. All personal data collected by Unique Hotels in connection with membership of Unique Traveler is subject to the privacy rights listed in the section below headed "Your privacy rights".

### **Website and marketing**

Unique Hotels may also use your personal information to:

- (a) administer the website;
- (b) improve your browsing experience by personalising the website;
- (c) enable your use of the services available on the website.
- (d) send you goods purchased via the website and/or supply you with services purchased via the website.
- (e) send statements and invoices to you and track payments.
- (f) track your use of the reservation process and contact you once via email regarding your experience.
- (g) send you general (non-marketing) commercial communications.
- (h) send you e-mail notifications which you have specifically requested;
- (i) send you marketing communications relating to our business or the businesses of carefully selected third parties which we think may be of interest to you by post or, where you have specifically agreed to this, by e-mail or similar technology (you can inform us at any time if you no longer require such marketing communications);
- (j) provide third parties with statistical information about our users but this information will not be used to identify any individual user.
- (k) deal with enquiries and complaints made by or about you relating to the website.

Where you submit personal information for publication on the website, Unique Hotels will publish and otherwise use that information in accordance with the licence you grant to us.

Unique Hotels will not, without your express consent, provide your personal information to any third parties for the purpose of direct marketing.

### **Sharing your personal information**

Unique Hotels may disclose information about you to any member of our group, which means our subsidiaries, holding company and its subsidiaries, any employees, officers, agents, suppliers or sub-contractors including, but not limited to, Unique Hotels, insofar as reasonably necessary for the purposes as set out in this privacy policy.

It may sometimes be necessary for Unique Hotels to disclose your personal information in order to comply with a legal obligation, but we will only do so in accordance with data protection legislation and will ensure that the appropriate security measures are observed.

Except as provided in this privacy policy, Unique Hotels will not provide your information to third parties.

## **How long do we hold your personal information?**

Unique Hotels will only store your personal data for as long as is necessary for the legitimate purpose for which it was supplied, and it will be destroyed or deleted when it is no longer necessary for Unique Hotels to hold it. You can ask us to erase or delete all or some of your personal data at any time although that may impact upon the benefit you get from our website or other services.

## **Security of your personal information**

Unique Hotels will take reasonable legal, technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

Unique Hotels will store all the personal information you provide on its secure (password and firewall protected) servers. Reservations you make with Unique Hotels will be encrypted using SSL technology.

In the course of processing or transmitting your credit card CVV number Unique Hotels will observe and fully comply with the current Data Security Standard of the PCI Security Standards Council.

You accept that data transmission over the Internet is inherently insecure and Unique Hotels cannot guarantee the security of data sent over the Internet.

## **International data transfers**

Personal information that Unique Hotels collects or holds may be transferred to, and stored at a destination outside to the European Economic Area ("EEA"). It may also be processed by staff operating outside to the EEA who work for Unique Hotels or for one of its suppliers. This includes staff engaged in, amongst other things, the fulfillment of any reservation, the processing of your payment details and the provision of support services.

Personal information which you provide may be transferred to countries (including the United States of America) which do not have data protection laws equivalent to those in force in the European Economic Area. However, wherever possible Unique Hotels has implemented the appropriate legal and security measures to ensure that your personal data is protected.

In addition, personal information that you submit for publication on the website will be published on the Internet and may be available, via the Internet, around the world.

Unique Hotels cannot prevent the use or misuse of such information by others.

You expressly agree to any such transfers of personal information.

## **Your privacy rights**

You have the rights listed below in relation to personal data we hold about you:

- Delete data: You can ask us to erase or delete all or some of your personal data.
- Change or Correct data: You can ask us to change, update or fix your data in certain cases particularly if it is inaccurate.
- Object to, or Limit or Restrict our Use of data: You can ask us to stop using all or some of your personal data or to limit our use of it.
- Right to Access and/or Take your data: You can ask us for a copy of your personal data to be provided in machine readable form.

- Complaint: You have the right to lodge a complaint with Unique Hotels supervisory authority which is the Israeli Information Commissioner's Office.

If you wish to exercise any of these rights, you can contact our Data Protection Team by email at [info@uniquehotels.co.il](mailto:info@uniquehotels.co.il)

### **Data Controller and Contact**

The data controller responsible in respect of the information collected on the website or otherwise in the course of your dealings with us is Unique Hotels whose registered office is at Kibutz Shefayim ,Israel

Any queries regarding Unique Hotels use of your personal data should be addressed to us by e-mail: [info@uniquehotels.co.il](mailto:info@uniquehotels.co.il).

### **Our use of 'cookies'**

To make Unique Hotelswork even better for you, we also use 'cookies' to collect information about your use of the website. You should read our Cookies Policy for full details.

### **Policy amendments**

Unique Hotels may update this privacy policy from time-to-time by posting a new version on the Unique Hotels website and, as appropriate, this will be notified to you by email. You should check this page when using the Unique Hotels website to ensure you are happy with any changes.