

# Privacy Policy

Last Updated: October 2018

## 1. Introduction

1. 1.1. The Seven Hotel use your personal information to fulfil our commitment to providing you an unparalleled guest service experience in connection with all of our guest interactions. As part of that undertaking, we are committed to safeguarding the privacy of the personal information that we hold.
2. 1.2. The terms "we", "us" and "our" refer to The Seven Hotel;
3. 1.3. The terms "you", "your" and "guest" refer to you;

## 2. Personal Information

1. 2.1. Personal Information that we may collect about you is directly related to an individual and the type of information includes:
  - 2.1.1 Your name;
  - 2.1.2. Postal or Billing address;
  - 2.1.3. Email address;
  - 2.1.4. Telephone, Mobile or Fax number;
  - 2.1.5. Payment information;
  - 2.1.6. Identification (e.g. passport or ID card details);
  - 2.1.7. Hotel stay information;
  - 2.1.8. Your Preferences;

### 3. Use of Personal Information

1. 3.1. In order to access certain features, content or functions of the services, for example, account registration and reservations, you may be asked to provide personal information such as your name, surname, phone number, date and place of birth, gender, residing address, e-mail address, work contact details, business title, nationality, passport, visa information, profile picture and other personal information.
2. 3.2. Guest information will be recorded in our systems for the hotels where you have stayed, the dates of arrival and departure, any special requests made and notes regarding your service preference.
3. 3.3. If you are an employee of a corporate account, vendor or other type of business partner, you must provide us the details of employer and/or other relevant details to ensure that you are eligible to use the relevant services.
4. 3.4. When you purchase products and services from us, your payment information from credit, debit or other card types, including card number, expiration date and address may be collected by us and/or third-party payment processors.
5. 3.5. Your Information helps us to provide you with a better or more personalised level of service, including information and services from a third party;
6. 3.6. Your Personal Information may also be used to:
  - 3.6.1. provide and charge for hotel accommodation and other goods and services;
  - 3.6.2. respond to your requests for information and services including services from a third party;
  - 3.6.3. fulfil contractual obligations to you, anyone involved in the process of making your travel arrangements such as travel agents, group travel organisation, your employer and vendors;

- 3.6.4. meet legal and regulatory requirements;
  - 3.6.5. assist with the detection and prevention of fraud or infringement of our or and/or an third party's rights;
  - 3.6.7. establish and maintain a responsible commercial relationship with you and to provide ongoing service;
  - 3.6.8. respond to your questions, complaints, or reviews of our product or services or those of other member hotels;
1. 3.7. We can also use your personal information as is subject to this privacy policy as we believe to be necessary or appropriate as set out below:
- 3.7.1. Under applicable law including laws outside your country of residence;
  - 3.7.2. To comply with legal process;
  - 3.7.3. To respond to requests from public and government authorities, including public and government authorities outside your country of residence;
  - 3.7.4. To enforce other terms and conditions;
  - 3.7.5. To protect our operations or those of any of our affiliates;
  - 3.7.6. To protect our rights, privacy, safety or property and/or that of our affiliates, you or others;
  - 3.7.7. To allow us to pursue available remedies or limit damages that we may sustain.

## 4. Disclosure of your personal information

1. 4.1. Your personal information may be disclosed in connection with services that we provide.
2. 4.2. Personal information may be shared within our company so that we can better provide services to you.

3. 4.3. Limited personal information will be shared with third-parties involved in supplying guest services that guests have purchased to the extent necessary for the third-party to provide the service.
4. 4.4. Personal information may be shared with third-parties retained by us to perform functions on our behalf such as reservation handling.
5. 4.5. We retain your personal information including details of your stay, preferences, room/accommodation type and amenities used after your stay and this will not be sold or transferred to any party not involved with your stay with us. We may disclose your personal information to an authorised licensee in connection with the services, including with respect to a reservation you book through us, in connection with offerings of travel related services or to our developers, or to enable an authorised licensee to market and operate the business that it is licensed.

## 5. Security of use of your personal information

1. 5.1. We understand that the security of personal information is important to you and to us, therefore, we use software that encrypts your personal information that you provide to us.
2. 5.2. The personal information that we collect from you online is stored by us and/or our service providers on databases protected through a combination of physical and electronics access control, firewall technology and other reasonable security measures. However, the security systems cannot prevent 100% of all loss, misuse or alteration of personal information and we are not responsible for any damages or liabilities relating to any such incidents fully permitted by law.
3. 5.3. If you have reason to believe that your information with us is no longer secure, please notify us immediately in accordance with the "Contact us" or to the Information Officer at the address in Section 6.

## 6. Change or update your personal information

1. 6.1. If you would like or need to change and/or update your personal information that you have provided to us, you may contact us via:

Attention to: Violant Tarrach

Email: [manager@thesevenhotel.lu](mailto:manager@thesevenhotel.lu)

Address: The Seven Hotel  
50 Gaalgebierg  
L-4142 Esch-Sur-Alzette  
Luxembourg

## 7. Retention of your information

1. 7.1. We will maintain personal information for as long as we are required to execute by the applicable law, or for as long as necessary for the purposes described within this privacy policy.
2. 7.2. We will delete personal information when it is no longer needed and/or take proper steps so that you can no longer be identified from it unless we need to keep your information to comply with legal or regulatory obligations to which we are subject to.
3. 7.3. In any event, upon expiration of the maximum storage term set forth by applicable law.

## 8. Use of service by children

1. 8.1. We do not sell products and/or services to individual under the age of 18 years,
2. 8.2. Where the child is below the age of 18 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child

## 9. Updates to this privacy statement

- 9.1. We may change this privacy statement. The "LAST UPDATED" legend at the top of this page indicates when this privacy statement was last revised. Any change will become effective when we post the revised privacy statement on the Online Services. Your use of the Services following these changes means that you accept the revised privacy statement.

## 10. Contacting us

- 10.1. If you have any questions about this privacy statement, please contact us at [manager@thesevenhotel.lu](mailto:manager@thesevenhotel.lu) or mailing address as set out below:

Address: The Seven Hotel,  
50 Gaalgebierg  
L-4142 Esch-Sur-Azette  
Luxembourg

*the  
seven  
hotel*