



# LE MIRADOR RESORT & SPA

## PRIVACY POLICY

At Le Mirador Resort & Spa, we emphasize the importance of privacy and are committed to protect the personal information of our guests by adopting high standard procedures. Accordingly, this privacy policy informs users about the type, scope and purpose of data and use of information which we collect.

### **I. Visiting the website**

We collect information about the behavior of visitors to our Website for overall analysis in order to enhance the service we provide, maintain, and improve the Site and adhere to legal obligation. The following technical data will be saved without any action on your part, and stored by us until it is automatically deleted:

- IP address
- File, time and date of the inquiry
- Name and URL of the file
- Website from where the inquiry was made
- Operating system of your computer
- Location from which you made access
- Language setting in your browser
- Browser type and version
- Name of your internet provider

The processing of such data is carried out anonymously, it is, therefore, impossible to identify any individual person from this data.

#### **a. Social media buttons**

On our Website we use the following social media plug-ins: Facebook, Pinterest, Twitter, and Instagram. When you navigate on our Website, your personal data will initially not be collected by the providers of these social media plug-ins. Only if you click on one of the plugins your personal data will be transmitted.

#### **b. Subscription to our newsletter**

On our website, you have the option to subscribe to our newsletter. The following information needs to be provided as part of the registration:

- Title
- Name and first name
- E-mail address



In addition to these data, you may voluntarily provide further information (date of birth and country of residence). We use these data exclusively to personalize the information and offers that will be sent to you. There is a link at the end of every newsletter which allows you to cancel your subscription at any time. In addition, the click behavior of the newsletter recipient will also be recorded and evaluated. We use these data for statistical purposes and to optimize the newsletters in terms of content and structure.

### **c. Google Analytics**

Our Website uses Google Analytics, which is a web analytics service provided by the third party provider Google, Inc. ("Google"). Google Analytics is used for the purpose of evaluating your use of our Website, compiling reports on Website activity and other services relating to Website and internet usage. The information generated by the cookie about your use of the Website is usually transmitted to and stored by Google, on servers in the United States. This transfer is covered by Google's Privacy Shield certification and a separate data processing agreement that we have concluded with Google:

[https://support.google.com/analytics/answer/6004245?hl=de&ref\\_topic=2919631](https://support.google.com/analytics/answer/6004245?hl=de&ref_topic=2919631)

(information on Google Analytics and data privacy).

## **2. Data used for a reservation process**

When processing a reservation at Le Mirador Resort & Spa or on our website [www.mirador.ch](http://www.mirador.ch), some personal information is necessary such as:

- Name and first name
- Postal and billing addresses
- E-mail address
- Credit card information
- Telephone number
- Your preferences regarding your hotel stay e.g. bed size or special requirements
- Other relevant data

We will use this information for Le Mirador Resort & Spa business purposes only. We may, therefore, send information about special offers or promotions by postal mail to your home or by using your e-mail address to mail you.

## **3. Sharing of personal information**

We collect personal information in order to:

- Establish and maintain a responsible commercial relationship with you and to provide ongoing service.
- Understand your needs and preferences. We maintain a record of the products and services you receive from us and we may ask for additional information so that we can serve you better. For example, we may record your preference for type of room.



- Develop, enhance market or provide products and services. For example, we look at our guests' use of our services so that we can better understand how to improve our services.
- Manage and develop our business and operations. For example we analyze guest patterns of usage of our hotels and services to help us manage them efficiently and plan for future growth.
- Meet legal and regulatory requirements.

We disclose personal information only in these limited circumstances:

- We may disclose a guest's personal information to a person who, in the reasonable judgment of Le Mirador Resort & Spa, is seeking the information as an agent of the guest - for example, a travel agent who is booking a reservation on behalf of the guest.
- Personal information will be shared with a third party involved in supplying the guest with the services they have purchased to the extent necessary to affect the supply and the processing of the transaction.
- Personal information may be shared with an agent retained by Le Mirador Resort & Spa to evaluate a customer's credit worthiness or in order to collect a customer's account.
- Personal information may be shared with a public authority or an agent of public authority if in the reasonable judgment Le Mirador Resort & Spa it appears that there is an imminent danger to life or property which could be avoided or minimized by disclosure of the information, or which disclosure is compelled by legal authority.

Any such disclosure of a guest's personal information by Le Mirador Resort & Spa to a third party will be made only on a confidential basis conditioned upon the information being used only for the purpose for which it has been disclosed.

#### **4. Transfer of personal data to a foreign country**

Le Mirador Resort & Spa is entitled to transmit your personal data to third-party companies abroad if this is required for the data processing described in this privacy policy. These third-party companies are bound to protect data to the same extent as we are. If the level of data protection in a country does not correspond to the Swiss or European level, we ensure through a contractual agreement that your personal data is protected at all times to the level corresponding with that in Switzerland and in the EU.



## **5. Data security**

We take data protection within the company very seriously. This is why we have strengthened our technical measures to protect your data against accidental loss, theft or any unauthorized processing. We ensure that group companies and service providers authorized by us adhere to the relevant legal data protection regulations.

## **6. Use of cookies**

Cookies are information files that your web browser saves automatically on the hard drive of your computer when you visit our website. Cookies help to make your visit to our website easier as they verify your identity during your visit to our website and personalize your experience on our site. Nonetheless, cookies cannot read data from your hard disk or read cookie files created by other sites and all user data collected is anonymous. Most Internet browsers accept cookies automatically. However, you are able to configure your browser, giving you the opportunity to decide whether to accept it or not.

## **7. Retention of data**

You are always free to refuse to provide personal information to us. However, in either case, this may limit our ability to serve you.

Furthermore, we store personal data only as long as it is necessary:

- To use the above-noted advertising and analytical services for the purpose of our legitimate interests
- To perform to the services that you requested or for which you have given your consent
- To comply with our legal obligations.

If we no longer require this data to perform services for you, the data will be blocked. This means that the data may then only be used for accounting and tax purposes.

## **8. Deletion of data**

We will maintain personal information for as long as we are required to do so by applicable law(s), or for as long as necessary for the purpose(s) described above for which it is processed. We will delete personal information when it is no longer needed and/or take steps to properly anonymize it 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 Le Mirador Resort & Spa is subject). At any time, you may ask us to discontinue use of the information you have provided and request that we refrain from sending any further communications. In cases of consent being given and as long as it is technically and legally possible, we will totally block or partially block your personal data.



## 9. Children

Le Mirador Resort & Spa does not knowingly collect personal information from children under the age of 16, and users under the age of 16 should not submit any personal information to Le Mirador Resort & Spa. If Le Mirador Resort & Spa has actual knowledge that personal information about a child under 16 years old has been collected, then we will take the appropriate steps to delete this personal information.

## 10. General

This page was last updated on 01 September 2023. We will provide notice of any material changes to this Privacy Policy by posting a prominent notice on our Site and/or emailing you. If you have any questions or requests relating to our privacy practices, do not hesitate to contact us at [reservations@mirador.ch](mailto:reservations@mirador.ch)

## 11. Update of the new legislation 01.09.2023

We are committed to complying with the applicable provisions regarding data protection in accordance with the revised data protection law (nLPD) as well as the European General Data Protection Regulation (EU GDPR). The principles governing the processing of personal data are defined in Article 6 of the revised data protection law and include the following essential obligations, which we are aware of:

- Personal data can only be processed in accordance with the law.
- Their processing must be done in good faith and must be proportionate.
- Personal data can only be collected for a specific and identifiable purpose by the concerned individual; they can only be processed in a manner compatible with this purpose.
- Personal data are destroyed or anonymized as soon as they are no longer necessary for the purpose of processing.
- Anyone processing personal data must ensure their accuracy. They must take all reasonable measures to rectify, erase, or destroy data that is inaccurate or incomplete with respect to the purposes for which they are collected or processed. The adequacy of the measures depends on the nature and extent of the processing, as well as the risk that the processing poses to the personality or fundamental rights of the individuals concerned.

We confirm the following in particular:

### I. Register of Processing Activities

If we have 250 employees or more (per capita), or if we process sensitive data on a large scale or engage in high-risk profiling, we maintain a record of our activities.



## **2. Data Protection Declaration**

Any planned collection of personal data that is not required by law is subject to a Data Protection Declaration (DPD). We draw the attention of individuals to the DPD (general conditions, forms, applications, etc.). It is available on our website if we have one.

## **3. Data Processor**

If we entrust the processing of our data to an IT provider or another party, we establish an "OTD" (Agreement for Order Data Processing).

## **4. Notification of Data Security Breaches**

If the confidentiality, integrity, or availability of personal data is violated AND the risk of negative consequences for individual persons is high, we send a notification to the Federal Data Protection and Transparency Commissioner (PFPDT).

## **5. Respecting the Rights of Concerned Individuals**

We correctly identify the individual beforehand. We provide an individual with information about their own personal data and, upon request, certain other information. Any individual can request the correction of their data. Any individual can request the deletion of their data. In some cases, we must transmit personal data.

## **6. Data Protection by Default**

In apps, on websites, etc., privacy settings are limited to a minimum to ensure that the processing of personal data is limited to the minimum necessary for the intended use.

## **7. Confidentiality**

We keep confidential the personal data entrusted to us that are necessary for the exercise of our profession, or we clearly indicate in advance that we will not keep such data confidential.