



HKC HOTELS Privacy Policy

Within HKC Hotels Holding AB (org. no. 556420-1514) and all companies within the Group, we process personal data for our employees, suppliers and for other services. We respect and protect each individual's right to privacy, and we follow all applicable laws designed to protect you as a private person. Below, HKC Hotels Holding AB and all companies included in the group shall be collectively referred to as "**HKC Hotels.**"

HKC Hotels is considered a personal data manager with respect to the services we provide. Personal data refers to all information that can be directly or indirectly linked to a physical, living person.

We strive to maintain a high level of protection with regard to individual privacy and use personal data primarily to administer, provide, develop and maintain our services. By submitting your personal information to us and accepting the applicable terms and conditions, you consent to have your personal information processed in accordance with the respective service/position and in accordance with our privacy policy.

We inform of changes to our privacy policy by publishing an updated terms and conditions document on HKC Hotels' websites, and we recommend that you regularly review this document.

1. Collection and processing of personal data

HKC Hotels collects and processes your personal data, i.e. information that can identify you as an individual, only as permitted under the law. Data collection and processing may occur when making a reservation, registering for a newsletter, filling in guest questionnaires, signing agreements, etc. Where consent is explicitly required by law, we will first request your consent.

2. Information we collect

We only collect personal data that is relevant for the purposes described in the special terms and conditions for each service/position and in our privacy policy. We collect such information as names, addresses, phone numbers, email addresses, IP addresses, membership information, user history, travel information, booking references, payments, employment, emergency contacts, dietary restrictions, as well as your personal preferences and other information you have chosen to share with us. HKC Hotels' primary purpose for collecting and processing personal data is that it enables us to fulfil our commitments under the agreement and it improves your personal experience. HKC Hotels uses personal data to administer, provide, develop and maintain services.

This includes our communication during the booking process, such as booking notifications and follow ups regarding a recent stay. You have the right, at any time and at no expense to you, to declare that HKC Hotels may not use your personal data for marketing purposes.

3. Where we store and transfer your personal data

HKC Hotels stores personal data in accordance with the terms of our privacy policy and all applicable legislation. Personal data may be transferred between companies to be processed in accordance with the terms and conditions of our privacy policy. HKC Hotel employs subcontractors for, e.g., data operations management and personal data, may be transferred to these subcontractors. Our subcontractors will only process your personal information on behalf of HKC Hotels in accordance with our instructions and only after signing a personal data assistant agreement.

HKC Hotels may disclose your information to third parties such as a police or other authorities in connection with a criminal investigation, or if HKC Hotels is otherwise required to provide such information by law or under the order of a governmental authority.

4. Protecting and deleting/thinning personal data

HKC Hotels has taken appropriate technical and organisational measures to protect your personal data against, e.g. loss, manipulation or unauthorized access. We adapt our security measures on an ongoing basis according to the latest technological developments. HKC Hotels thins personal data in accordance with applicable laws and deletes or anonymises personal data when the original purpose for processing personal data is no longer applicable.

5. Other applications/website data

The services may contain links to other applications and/or web pages that are not managed by HKC Hotels. We are not responsible for the content of linked applications/websites and the processing of data that may be performed by the owners/operators of linked websites.

6. Cookies

HKC Hotels may collect information via cookies on our online services. Cookies are small text files stored on your computer or mobile by a website server. Cookies contain anonymous information such as a unique identifier and the name of the website. Cookies enable a website to remember your personal preferences and store products in your digital shopping cart. Under your web browser's help tab, you can find information on how to delete, block and manage cookies. If you choose to block cookies, it may mean that some sections of the website will become inaccessible or will not function properly.

7. Modify, delete and review your personal data

HKC Hotels takes measures to ensure that other companies within the group receive clear guidelines for handling personal data and defines the purposes for which HKC Hotels will use said personal data. If there are any changes to your personal information, please inform HKC Hotels by emailing the respective hotel, restaurant or your assigned contact person. HKC Hotels will respond to your request or contact you whenever HKC Hotels finds it necessary to correct or delete inaccurate or incomplete information. You also have the right to receive an extract free of charge showing the personal data that is being used. The request must be submitted in writing to the address listed in item 9. The letter must contain your name, postal address, telephone number, email address that has been used in communications with HKC Hotels and a copy of

your ID card. The extract will be sent to your registered mailing address. You may withdraw consent to further use your personal information at any time (non-retroactively) by contacting HKC Hotels at the address provided in section 9. HKC Hotels will prevent such information from being used further. Withdrawal of consent does not affect information received without consent, i.e., where we have a legal basis.

8. Transfer

If we sell, restructure or otherwise transfer all or part of our business operations, your personal data may be transferred in connection with such a change.

9. Contact

If you have any questions, comments or complaints regarding HKC Hotels' processing of personal data and compliance with the privacy policy's terms and conditions or applicable legislation regarding the handling of personal data, please submit a written letter to HKC Hotels Holding AB, Dataskyddsansvarig, Box 1776, 111 87 Stockholm Sweden.