

Privacy Notice for Hotel Guests

Thank you for your interest in our hotel and for the trust you place in us. We handle your personal data responsibly and process it in accordance with applicable data protection law, in particular the General Data Protection Regulation (GDPR) and the revised Swiss Federal Act on Data Protection (revFADP). In this Privacy Notice, we mainly refer to the GDPR; the same principles apply accordingly under the revFADP.

1. Scope of this Privacy Notice

This Privacy Notice informs you about the processing of your personal data and your rights in connection with:

- your hotel booking and stay (including related services),
- your participation in events (including related services),
- marketing communications,
- the establishment, exercise or defence of legal claims.

2. Controller and Contact Details

The controller within the meaning of Art. 4(7) GDPR and other applicable data protection laws is the respective operating company of the hotel in which you make a booking, stay overnight or use services.

The contact details of the respective responsible operating company can be obtained from the relevant hotel or via the data protection contact details set out below.

If you have any questions about data protection, you can contact us at: dataprivacy@revo-h.com

The relevant hotel should be named in your enquiry so that it can be assigned to the responsible operating company.

Data Protection Officer: intersoft consulting services AG, Beim Strohause 17, 20097 Hamburg, e-mail: DSB-HRG-Hotels@intersoft-consulting.de

3. Purpose and Scope of Processing

3.1. Booking, Stay and Related Services

We process your personal data to manage your booking and stay, to comply with legal obligations (e.g. statutory registration requirements) and to ensure the safety and security of our hotel.

This includes, in particular, the processing of your personal data for:

- reservation management, (online) check-in/check-out and digital guest services (e.g. digital guest directory and, where applicable, the ordering and payment of additional services such as minibar items). You will receive the link to our web app by e-mail before your arrival.
- payment processing,
- communication with you before, during and after your stay,
- use of additional services (e.g. gastronomy, guest card, wellness, leisure activities),
- guest Wi-Fi access, voucher sales and lost property management,

- compliance with statutory reporting obligations,
- security measures (e.g. CCTV/video surveillance in clearly marked public areas, incident documentation),
- internal purposes (e.g. quality management and statistical analyses, where possible anonymised or pseudonymised)

In particular, we process the following categories of data: identification and contact data (e.g. name, contact details, date of birth), booking and contract data (e.g. stay details, guest requests), payment information, communication content (e.g. e-mail correspondence relating to your booking or stay), legally required registration data, information on the use of additional services (e.g. gastronomy), security-related data and technical usage data (e.g. when using guest Wi-Fi, such as IP address, MAC address and time of use).

3.2. Event Management

For the planning, delivery and follow-up of events, we process your data in particular to:

- event planning and organisation,
- participant communications,
- payment processing,
- participant list management,
- handling enquiries and complaints

Processed data categories: identification and contact data (e.g. name, contact details), event and service data, communication content (e.g. e-mail correspondence relating to your event booking or participation), security-related data and, where applicable, photo or video recordings (e.g. for marketing purposes, subject to the applicable legal requirements).

3.3. Marketing

3.3.1 Marketing Communications by E-Mail and Post

We may send you information about similar products and services. You can object at any time, in particular:

- **E-mail advertising to existing customers:** If you have previously stayed with us, we may send you information about our offers by e-mail (Sec. 7(3) German Act Against Unfair Competition (UWG) in conjunction with Art. 6(1)(f) GDPR).
- **Postal advertising:** Based on our legitimate interests (Art. 6(1)(f) GDPR), we may inform you by post about current offers and news.

You can object to the use of your data for advertising purposes at any time by e-mail to the contact details mentioned above or via the unsubscribe link in our e-mails.

3.3.2 Guest Surveys and Feedback

To improve our services, we regularly conduct guest surveys and satisfaction analyses – online, on site or via external review platforms. If you participate in a satisfaction survey conducted by a franchisor or another cooperation partner in relation to our hotel, the respective provider may forward the survey results to us. We evaluate the information received as part of our quality management. This usually includes information about your stay and, where applicable, your contact details. Participation is voluntary; anonymous participation is usually possible.

3.3.3 Competitions and Sweepstakes

We occasionally run competitions and sweepstakes in which you may participate voluntarily. In this context, we process the personal data required to administer the respective competition or sweepstakes (e.g. name, contact details, participation details and, where applicable, winner details). The terms and conditions applicable to the respective competition or sweepstakes are provided separately and include information on the data processing.

3.4 Debt Collection, Credit Checks and Legal Enforcement

In the event of payment default or legal disputes, we process personal data to establish, exercise or defend legal claims.

If we provide services in advance (e.g. for invoice-based bookings or longer stays), we may carry out a credit check to safeguard our legitimate interests.

Enforcement of our right of admission / house rules: In the event of serious misconduct (e.g. violence or repeated non-payment), we may issue a ban from our premises ("house ban") and may include the guest concerned on an internal exclusion list. As a rule, we process the guest's name, where applicable the date of birth, and information about the incident and the house ban. Affected guests will be informed about the house ban, the reasons for it and the data processed.

Our legitimate interests are to protect the company, our employees and our guests. The data will only be stored for as long as is necessary to enforce the house ban or to fulfil legal obligations.

You can object to the processing of your data in accordance with Art. 21 GDPR if there are reasons arising from your particular situation that speak against the processing.

3.5 Legal Basis for Processing

We rely on the following legal bases to process your data:

- **Performance of a contract (Art. 6(1)(b) GDPR)** – We process your data to carry out your booking, stay or participation in events, based on the contract with you or pre-contractual measures (e.g. to process payment data to complete your booking).
- **Compliance with legal obligations (Art. 6(1)(c) GDPR)** – We process your data to comply with legal requirements (e.g. collect registration data for authorities, retain invoices in accordance with the German Commercial Code (HGB) and the German Fiscal Code (AO), and respond to official requests and investigations).
- **Legitimate interests (Art. 6(1)(f) GDPR)** – We may process your data where we have a legitimate interest that is not overridden by your interests or fundamental rights and freedoms (e.g. quality management, advertising, security measures, debt collection, credit checks or issuing a house ban).
- **Consent (Art. 6(1)(a) GDPR)** – Where required, we process your data based on your consent (e.g. creating and publishing photo or video recordings).

4. Storage Period

We store your personal data only for as long as necessary to fulfil the purposes for which we collected it or as long as statutory retention periods apply. Once the purposes no longer apply and there are no statutory retention obligations, and provided no exception under Art. 17(3) GDPR applies, the data will be deleted or anonymised.

Examples of retention periods:

- Registration forms: at least 12 months (§ 30 para. 4 BMG)
- Commercial and business letters: 6 years (§ 257 para. 4 HGB / § 147 para. 3 AO)
- Accounting records (e.g. invoices, payment receipts, receipts): according to the applicable retention periods under commercial and tax law
- Video recordings (without incident): 72 hours

5. Recipient Categories and Transfers to Third Countries

5.1. Categories of Recipients

We only share your personal data with third parties where this is necessary to fulfil contractual or legal obligations, or where we have a legal basis to do so (in particular your consent or our legitimate interests).

The recipients of your personal data include, in particular: IT service providers; payment service providers; service providers for marketing measures, such as e-mail providers, printing service providers or lettershops; group companies providing central services, such as accounting and legal advice; franchisors and other cooperation partners, where necessary for hotel-related services, quality management, guest surveys or loyalty programmes; and lawyers, tax advisers, debt collection service providers and credit agencies, where necessary for the establishment, exercise or defence of legal claims and address verification.

5.2. Transfers to Third Countries

Generally, we process your data within the European Economic Area (EEA). If personal data is transferred to recipients outside the European Union (EU) or the EEA, this will only take place where an adequate level of data protection is ensured. Depending on the circumstances, we rely in particular on an adequacy decision of the European Commission and/or the EU Standard Contractual Clauses. Further information is available upon request.

6. Automated Decision-Making

We do not use automated decision-making, including profiling.

7. Sources and Provision of Personal Data

We collect your personal data either directly from you, for example when you book directly with the hotel, or receive it from third parties such as booking portals, franchisors, travel agencies or other cooperation partners. These third parties usually act as independent controllers and transmit the personal data required for your booking, such as your name, contact details, travel dates and payment information, on the basis of their own privacy notices.

The provision of personal data is generally voluntary. However, for certain services (e.g. booking a stay or using specific offers), we require certain mandatory information. If you do not provide this data, we may not be able to provide the respective service. We or the relevant booking platform or travel intermediary will inform you which information is required.

8. Rights of Data Subjects

As a data subject, you have the following rights under the GDPR:

- **Right of access:** You can request information about whether and how we process personal data about you, including the purposes of processing, the categories of data concerned, the recipients and the envisaged storage period (Art. 15 GDPR). If you specify your request, we can respond more quickly and in a more targeted manner.
- **Rectification:** You can have inaccurate personal data rectified and incomplete data completed (Art. 16 GDPR).
- **Erasure:** You can request the erasure of your data under certain conditions, for example if it is no longer necessary for the purposes for which it was collected, or if you have withdrawn your consent (Art. 17 GDPR).
- **Restriction of processing:** You can request restriction of processing in certain cases, for example if you contest the accuracy of the data or if an erasure request is being examined (Art. 18 GDPR).
- **Objection:** You can object to the processing of your data on the basis of our legitimate interests for reasons arising from your particular situation (Art. 21 GDPR).
- **Data portability:** You can receive the data you have provided us with in a common, machine-readable format and, if necessary, have it transmitted to another controller (Art. 20 GDPR).
- **Revocation of consent:** You can revoke a previously given consent at any time for the future (Art. 7 para. 3 GDPR).
- **Complaint to a supervisory authority:** You have the right to complain to a data protection supervisory authority. The Berliner Beauftragte für Datenschutz und Informationsfreiheit, Alt-Moabit 59–61, 10555 Berlin, e-mail: mailbox@datenschutz-berlin.de, is the competent supervisory authority for our hotel.

To exercise your rights, you can contact us at any time by e-mail at dataprivacy@revo-h.com. Please include the name of our hotel in your request so that it can be assigned more easily.

9. Changes to this Privacy Notice

We regularly review this notice and update it in the event of changes in applicable law or our processing activities.

Last updated: May 2026