# **Privacy Policy**

At Costa Navarino, we are dedicated to protecting your privacy and safeguarding your personally identifiable information. Our mission is to consistently exceed our guests' expectations in terms of the products and services we provide to our business and leisure travelers. We strive to create an experience that is responsive to our guests' needs by using the information you entrust us with responsibly. TEMES S.A. is committed to respecting your privacy and adhering to the principles of applicable Greek and European data protection and privacy laws.

We have provided this Privacy Policy as an explanation of the information we collect, how we use it, and how the use of this information can benefit your experience on our web-sites and during your relationship with us. We wish to help you make informed decisions, so please take a moment to read the sections below.

### Types of information we collect

TEMES S.A. collects information about our guests and visitors to our web-sites so that we can provide an experience that is responsive to our guests' and visitors' needs. We endeavor to collect information only with your knowledge and with your permission if necessary. The types of personally identifiable information that we collect may include your name, home, work and e-mail addresses, telephone and fax numbers, credit card information, date of birth, gender, and lifestyle information such as room preferences, leisure activities, names and ages of children, and other information necessary to fulfill special requests (e.g., health conditions that require special room accommodations).

TEMES S.A. may also collect non-personally identifiable information about you, such as your use of our web-site, communication preferences, travel habits, aggregated data relative to your stays, and responses to promotional offers and surveys.

Purpose for collection, processing, and disclosure

### Collection & Use

TEMES S.A. is fully committed to providing you with information about the collection and use of personally identifiable information (PII) furnished by, or collected from, visitors while using

our web-sites, products and services. It is our practice not to ask you for information unless we need it or intend to use it. Some of the primary purposes for collecting your PII are as follows:

- providing services such as processing a transaction (e.g., making a reservation, fulfilling a request for information, or completing a product order)
- marketing and communications with you in relation to the products and services offered at Costa Navarino by TEMES S.A., our strategic marketing partners, and other trusted third parties
- performing market research via surveys to better serve your needs, improve the
  effectiveness of our web-sites, your experience, our various types of communications,
  advertising campaigns, and/or promotional activities

You will always be offered the choice not to submit your PII or to decide what communications you want to receive from us.

## **Processing and Disclosure**

In most cases, the information you provide is added to a local or global database. In the course of processing your information, it may be necessary to transfer your PII to our affiliates, properties within the Costa Navarino system and/or third party service providers located in Greece and throughout the world for the purposes outlined within this Privacy Policy. TEMES S.A. does not sell, rent, or give physical possession of your PII to unaffiliated third parties outside the Costa Navarino system. Situations in which TEMES S.A. may disclose your information to others include:

- § when we have received your consent to do so
- § in situations where sharing or disclosing your information is required in order to offer you products or services you desire (e.g., reservations)
- § when companies or services providers that perform business activities on behalf of TEMES S.A. require such information subject to your consent
- § to comply with legal or regulatory requirements or obligations in accordance with applicable law or court order
- § in case of emergency such as to safeguard the life, health, or property of an individual

If information is shared as mentioned above, we seek to limit the scope of information that is furnished to the amount necessary for the performance of the specific function. Unless otherwise precluded by legal process, we require third parties to protect your PII and abide by applicable privacy laws and regulations.

### Consent

As part of our commitment to keep you informed, we may mail, e-mail, telephone, or contact you by other means to notify you of new Costa Navarino products and services, or upcoming Costa Navarino special offers, events, enhancements, or other relevant information that may be of interest to you. Subject to your consent, you may also receive mailings or other communications from carefully selected third parties. We always offer you the option to decline any or all of these communications by following the directions included in our e-mails or other communications, or by contacting TEMES S.A. directly. We would like to keep all of our guests and visitors informed and equally able to take advantage of the benefits offered by TEMES S.A. and its strategic marketing partners.

In some cases your permission will be implied from the nature of the service requested or transaction undertaken. For example, TEMES S.A. may collect and use personally identifiable information that you volunteer, or behavioral data or information collected in the aggregate. In addition, your permission will be deemed given for communications from us that are necessary to fulfill transactions and services that you request.

#### Access to personally identifiable information

To ensure that your personally identifiable information (PII) is accurate and up to date, we encourage you to regularly review and update your information as appropriate (e.g., in the event your home or e-mail address changes, or you wish to add an additional method for us to communicate with you). If, upon review, you wish to remove your PII from our database, we will endeavor to honor your request consistently with applicable law. Occasionally, information that you request to be removed will be retained in certain files for a period of time in order to properly resolve disputes or to troubleshoot technical problems.

# Security safeguards

TEMES S.A. recognizes the importance of information security, and is constantly reviewing and enhancing our technical, physical, and logical security rules and procedures. All TEMES S.A. owned web-sites and servers have security measures in place to help protect your personally identifiable information against loss, misuse, and alteration while under our control. Although "guaranteed security" does not exist either on or off the Internet, we safeguard your information using both procedural and technical safeguards, including password controls and "firewalls".

## On-line technologies

TEMES S.A. may use cookies, invisible pixels, and web beacons to obtain information about you while visiting our web-sites. A cookie is a very small text file that is sent to your browser from a web server and stored on your computer's hard drive. It assigns the computer with a unique identifier, which in turn, becomes your identification card whenever you return to the Costa Navarino web-site.

Cookies are designed to save you time because they help us to provide you with a customized experience without you having to remind us of your preferences each time you return to our web-pages. Cookies of the Costa Navarino web-site are not designed to damage your files, nor can they read information from other files on your computer hard drive.

Cookies can also help us provide you with a personalized on-line experience in the following ways:

- they remember your user name and password for future visits so log-in is easier and faster
- they ensure you are provided with the appropriate frames and content
- they ensure you obtain all requested information
- they help us deliver communications that are relevant and responsive to your interests and location

Cookies of the Costa Navarino web-site are limited to this web-site only, and are not designed to follow you when traveling on the Internet after leaving the Costa Navarino web-site. We track the usage of our web-site in order to better meet your needs and to help make it easier for you to find information in the future. Please note that in addition to TEMES S.A. cookies, various third parties may also place cookies on your computer's hard drive as you navigate throughout other webpages on the web. TEMES S.A. is not responsible for the presence or absence of third party cookies, or for the technological capabilities or practices employed by third parties in connection with third party cookies.

If you would prefer not to have the benefits of cookies, your Internet browser can be adjusted to treat cookies in different ways. Depending upon the type of browser you are using, you may be able to configure your browser so that: (i) you are prompted to accept or reject cookies on an individual basis or (ii) you may be able to prevent your browser from accepting any cookies at all. You should refer to the supplier or manufacturer of your web browser for specific details about cookie security. However, you should also understand that rejecting cookies might affect your ability to perform certain transactions on our web-sites and our ability to recognize your browser from one visit to the next.

TEMES S.A. also uses invisible pixels, sometimes called web beacons, to count how many people visit certain web pages. Information collected from invisible pixels is used and reported in the aggregate and does not contain personally identifiable information. TEMES S.A. may use this information to improve marketing programs and content.

#### Links to other web-sites

In order to anticipate your needs, the Costa Navarino web-site provides links to other web-sites for your convenience and information. TEMES S.A. is not responsible or liable for any content presented by or contained on any independent web-site, including, but not limited to, any advertising claims or marketing practices. Please note that while TEMES S.A. will protect your information on TEMES S.A. owned and operated web-sites, we cannot control and will not be responsible for the privacy policies of third party web-sites, including web-sites owned or controlled by operators, third party owners of hotel, resort, interval ownership, or residence properties that may use the name of a Costa Navarino brand, or web-sites not controlled or authorized by TEMES S.A.. Third party web-sites that are accessed through links on our web-site have separate privacy and data collection practices, and security measures. We have no responsibility or liability for the practices, policies and security measures implemented by third parties on their web-sites. We encourage you to contact them to ask questions about their privacy practices, policies and security measures before disclosing any personally identifiable information. We recommend that you review the privacy policies of linked web-sites to understand how those web-sites collect, use and store information.

### Minors

TEMES S.A. does not seek to obtain nor does it wish to receive personally identifiable information directly from minors; however, we cannot always determine the age of persons who access and use our web-sites. If a minor (as defined by applicable law) provides us with his/her data without parental or guardian consent, we encourage the parent or guardian to contact us to have this information removed and to unsubscribe the minor from future Costa Navarino marketing communications.

## Contact us

If you would like to access and/or correct your PII, object to the processing of your PII by TEMES S.A., update your information, modify your communication preferences, or if you do not want to receive marketing communications regarding Costa Navarino or other projects of TEMES S,A. in the future, or if you have comments or questions regarding TEMES S.A.'s data privacy practices or this Privacy Policy, you may contact TEMES S.A. by choosing the most convenient method from the following:

Costa Navarino Web-Site - <u>www.costanavarino.com</u> - Privacy Policy

by e-mail: info@temes.gr

by telephone: +30 210 9490 221

by fax: +30 210 9490 218

by writing to us at:

TEMES S.A.

5 Pentelis Street

17564 Athens

Greece

Attention: Marketing - Consumer Affairs - Privacy

**Updates to the Privacy Policy** 

TEMES S.A. may amend this Privacy Policy from time to time in order to meet changes in the regulatory environment, business needs, or to satisfy the needs of our guests, properties, strategic marketing partners, and service providers. Updated versions will be posted to our web-site and date stamped so that you are always aware of when the Privacy Policy was last

updated.

Revised: November 23, 2009