



STEIGENBERGER  
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# Personal data policy for Alsik A/S

Revised December 2020

At Alsik A/S (“Alsik” or “we”), we place a high priority on data security and confidentiality. This personal data policy sets out clear guidelines for how we process personal information about our guests and visitors to our websites.

The personal data policy applies to all brands and websites under Steigenberger Alsik Hotel & Spa, including hotels, spas, Freias Spisestue, Syttende and Restaurant Alsik.

## Data controller

Alsik A/S, Nørre Havnegade 21, DK-6400 Sønderborg, CVR no: 37389609, is the data controller for the collection and processing of personal data.

## When do we collect personal data?

We collect, store and process personal data as part of our marketing and other activities.

We collect data e.g. when you contact us, make a reservation for a hotel stay or restaurant visit, use our website or contact us in any other way. We generally receive the information directly from you, but we may also receive information from other parties, such as booking portals.

How do we use your personal data?

Alsik processes personal data about you for the following purposes:

### **Booking of hotel stays or restaurant visits**

When we handle bookings for hotel stays or restaurant visits, we process information about you in order to deal with your request and check availability, complete the booking and send you a booking confirmation.

In this connection, we may process data including your name, e-mail address, telephone number, details of accompanying guests, and arrival and departure dates.



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We use Article 6(1)(b) of the General Data Protection Regulation (GDPR) as the basis for processing the data, as we need to process the information for the performance of a contract with you.

### **Your stay**

We process and store information about you in connection with your stay at our hotel in order to provide you with any services you may have booked and to give you the best experience during your time with us.

In this connection, we may process data including your name, position, place of residence, date of birth, nationality, e-mail address, telephone number, passport number or number of other travel document, details of accompanying guests, dietary needs, special preferences, etc.

We use Article 6(1)(b) of the GDPR as a basis, as certain information is necessary for us to fulfil a contract with you and to comply with the “balance of interests” rule in Article 6(1)(f) of the GDPR, as we have a legitimate interest in tailoring the services we provide to your needs and desires. The basis for processing your credentials is Article 6(1)(c) of the GDPR.

### **Booking of services at Alsik**

We collect and process information about you, including name, address, date of birth, telephone number, e-mail address and gender when you book fitness/yoga classes and/or spa and wellness facilities. We may also record the type of treatment, time and duration of treatment, any products included in your treatment, our recommendations etc.

Our processing of your personal data is based on Article 6(1)(b) of the GDPR, as the information is necessary for us to fulfil our contract for the service in question.

A further basis for the processing is our legitimate interest in being able to provide efficient delivery of our services to you, including managing agreements and appointments and recording sessions given in order to manage the course of treatment, cf. Article 6(1)(f) of the GDPR.



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### **Customer satisfaction surveys**

Please note that we may use your contact information to follow up on your satisfaction with your visit to us.

Our basis for this processing is the “balance of interests” rule in Article 6(1)(f) of the GDPR, as we have a legitimate interest in improving our services.

### **Marketing and newsletters**

If we have obtained your prior consent to this, we may process your personal information in order to send e-mails and newsletters from Alsik with e.g. latest offers, details of events and new facilities from Alsik. If at any time you do not wish to receive these e-mails and newsletters, you can unsubscribe using the unsubscribe link at the bottom of the newsletter or by sending an e-mail to [info.alsik@steigenberger.com](mailto:info.alsik@steigenberger.com). The basis for processing is your consent, cf. Article 6(1)(a) of the GDPR.

We may also issue service notices based on our legitimate interest in being able to keep you updated with important information, cf. Article 6(1)(f) of the GDPR.

### **Use of social media**

We use social media to keep in touch with interested users. We use the following social media:

- Facebook
- Instagram
- LinkedIn

You can get in touch with us via these social media and, in answering your inquiries, we will process any personal data that you enter in connection with your inquiry. Depending on your behaviour on our fan pages on social media, we and the social media provider may collect the following information about you when you visit the site:

- If you “follow” our page
- Any comments that you leave on our site



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- The fact that you have visited our site

We process your personal data on the basis of Article 6(1)(f) of the GDPR and hence of our legitimate interest in being able to answer your inquiries and improve our products and services. We share the role of data controller with each social media provider that we use to process personal data on our fan pages, and we therefore encourage you always to familiarise yourself with the provider's own personal data policy before using its functions and services.

We regularly take photos and/or videos in order to share our guests' experiences at our facilities. This is done in compliance with the applicable law, including the consent we obtain from you in accordance with Article 6(1)(a) of the GDPR if required.

### **Use of website**

We have access to information about visitors to the website as well as the visitors' use of the website and its functions. This includes the IP address, browser type and visitor behaviour.

The data collected is processed on the basis of our legitimate interest in gaining insight into users' use of the website so we can improve it, cf. Article 6(1)(f) of the GDPR.

### **Video surveillance**

We carry out video surveillance at our locations, including all communal areas and publicly accessible areas both outdoors and indoors. The video surveillance is based on our legitimate interest in preventing or investigating crime, cf. Article 6(1)(f) of the GDPR and Section 8(3) of the Danish Data Protection Act. We have put up signs around the areas that are CCTV-monitored.

The recordings will only be accessed and viewed where there is some suspicion of criminal acts, breaches of our internal policies or in connection with internal/external controls. The recordings may also be viewed where we need to analyse safety and security-related incidents.

The recordings are stored on a secure server, to which only a limited number of employees have access.

The recordings may be passed on to the police to assist them in their enquiries, cf. Section 8(4) of the Danish Data Protection Act, or if we are legally required to disclose them. If it is necessary to pass on the recordings for any other purpose, we will ask for your consent to this if you appear in the recordings.



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## **Communication**

When you contact us, we process the information you provide in order to respond to your inquiries. We urge you not to disclose any sensitive personal information (such as health information) to us unless it is strictly necessary for us to handle your inquiry.

Our basis for this processing depends on the nature of your inquiry. However, the basis will often be that the processing is necessary for us to fulfil a contract, cf. Article 6(1)(b) of the GDPR.

## **Other purposes**

In addition to the above, we may also process your personal data for the purpose of complying with legal requirements, or where it is needed for a legal claim to be determined, asserted or defended.

## **Who do we share your personal data with?**

In order to fulfil the purposes set out above, we may provide third parties with access to your personal information where they provide relevant services on the basis of a contractual relationship with Alsik, e.g. IT providers, e-mail providers and marketing service providers. Such service providers will only process personal data in accordance with our instructions, under formal data processing agreements.

Alsik may also pass on your personal information to subcontractors when necessary to fulfil the contracts we have entered into with you. For example, your credit card information is processed by our payment provider when you book online. In certain circumstances and in accordance with the law, it may be necessary to pass on personal data to accountants, lawyers, public authorities or the police. For example, information may be passed to the police in cases where there is suspicion of credit card fraud.

If your personal data is transferred to data processors or data controllers established in countries outside the EU/EEA which do not have an adequate level of protection, the transfer will normally be based on the standard contract provisions published by the European Commission.

## **How is your information stored?**

Whether your personal data is stored and processed physically or digitally, Alsik has taken the necessary precautions to ensure that your information is stored securely and protected against misuse.



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Alsik provides for secure storage and processing of your personal data at all times. We also ensure that only relevant employees have access to your information.

## How long do we store your information?

Your personal data will be deleted or anonymised when it is no longer necessary for us to store it for the purposes described in this policy.

We retain the personal information that we have recorded about you in connection with visits to our restaurants for 1 year from the last restaurant visit.

Guest information collected in connection with bookings and stays at our hotels will be stored for 2 years from the most recent stay for Danish guests and 1 year for foreign guests.

If you have signed up for our newsletter, we will store personal information related to this for 2 years from the date you unsubscribe from the newsletter, as we are required to be able to show your consent during this period.

Video materials from surveillance are deleted after 30 days, unless the recordings are to be used to investigate a crime or to handle specific disputes. In these cases, the recordings will be deleted when further storage/processing is no longer required.

Information relating to accounting material is stored for 5 years from the end of the financial year to which the information relates.

Job applications with supporting documents are stored for 6 months after the application deadline, unless we receive consent for further storage.

We may process your personal data for a longer period than stated above in anonymised form, or if we are required to do so under the applicable law.

## Cookies

Our web pages use cookies to optimise the use of our website. Please refer to our cookie policy, which can be found at [Alsik.dk](https://www.alsik.dk).



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## Your rights

You have the following rights in relation to our storage and processing of your personal data:

- You have the right to access the personal information we process about you.
- You have the right to object to our collection and continued processing of your personal data
- You have the right to have your personal data corrected and deleted, but with certain statutory exceptions.
- You have the right to ask us to restrict your personal data.
- In certain circumstances, you can also ask to receive a copy of your personal information, and to have the personal information you have provided to us transferred to another data controller (data portability).
- You can revoke any consent you may have given at any time. You can unsubscribe to our newsletter by clicking on the link at the bottom of the newsletter.

## Contact

If you have any questions about this personal data policy, or if you want to complain about the way in which we process your personal information, you are welcome to contact us at [info@alsik.steigenberger.dk](mailto:info@alsik.steigenberger.dk).

If you want to appeal about our processing of your personal information, you can contact the Danish Data Protection Agency, Carl Jacobsens Vej 35, DK-2500 Valby, tel. +45 33 19 32 00, e-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk).

## Other websites

Our platforms and communications may contain links to other platforms. We accept no liability for content on these platforms. We encourage you to read the personal data policy on these sites.

## Changes to the Personal Data Policy

This page is being constantly updated and will always reflect the current personal data policy.