

# Impressum

Responsible for content of pages

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## Links to Other Websites

Some links on our website lead to third-party websites, which are completely beyond our control. Accordingly, we do not assume any responsibility for the accuracy, completeness, and legality of the contents of such websites, or for any offers and services contained. Following links to any off-site pages or other websites shall be at your own risk.

## Security on the Internet

Please remember that the World Wide Web is a freely accessible, open system. Each time you voluntarily enter personal information online, you do so at your own risk. Your data may be lost as they travel over the Internet, or they may fall into unauthorized hands. Grand Hotel National Ltd. cannot accept any responsibility and/or liability for data security and cannot guarantee that the content that can be accessed from any of its websites is free of viruses or other harmful components.

## Disclaimer of Liability

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provider of pages to which links point is solely responsible for any illegal, factually incorrect, or incomplete contents and for any losses sustained because of the contents of linked pages. This applies whether such losses are sustained directly or indirectly or are of a pecuniary nature or result from loss of data, downtime, or other causes.

# Privacy Policy

## Important Legal Information

Grand Hotel National Ltd. (for exact address, see above), is operator of the websites [www.grandhotel-national.com](http://www.grandhotel-national.com) and [www.apartments-national.com](http://www.apartments-national.com) and thus responsible for the collection, processing, and use of your personal data and the compatibility of data processing with Swiss law.

Your trust is important to us. Therefore, we respect privacy and to inform you about the data collected and stored, and your rights of access, correction, blocking and deletion. Please read this policy carefully before accessing the website or providing us with any personal information. By accessing and using this site, you accept the following privacy policy.

The address of our data protection representative in the EU:

VGS Datenschutzpartner UG  
Am Kaiserquai 69  
20457 Hamburg  
Deutschland

[info@datenschutzpartner.eu](mailto:info@datenschutzpartner.eu)  
[www.datenschutzpartner.eu](http://www.datenschutzpartner.eu)

## Purpose of Collecting and Processing Personal Data

Information you provide helps us to know and serve you better which is part of our Mission to completely delight and satisfy our guests.

Of course, we observe the statutory provisions of the Federal Data Protection Act (DSG), the Federal Data Protection Act (VDSG), the Telecommunications Act (FMG) and, if applicable, other data protection provisions the Basic Data Protection Regulation of the European Union (DSGVO). For you to know what personal information we collect from you and for what purpose we use it, please note the information below.

## Data Processing Operations in the Context of Our Website

### Calling up Our Website

Each time our website is visited, our servers temporarily save the access information in a log file. The following technical data is collected without your cooperation each time a connection is established to a web server and is saved by us:

- The IP address of the requesting computer
- The name of the owner of the IP address range (usually your Internet access provider)
- The date and time of access

- The name and URL of the retrieved file
- The website from which the access occurred (referrer URL) and, if applicable, the search word used
- The status code (e.g. fault message)
- The operating system of your computer and the browser you use
- The country from which you accessed and the language settings in your browser
- The transmission protocol used (e.g. HTTP/1.1) and
- Where applicable, your username from registration/ authentication data

The collection and processing of this data is for the purpose of enabling the use of our website (connection establishment), to ensure the long-term security and stability of the system, to optimize our website, and for internal statistical purposes. This is our legitimate interest in the processing of data within the meaning of Art. 6 para. 1 lit. f DSGVO.

In particular, the IP address is used to record the country of residence of the website visitor. Furthermore, the IP address is evaluated for statistical purposes when accessing the network infrastructure of [www.grandhotel-national.com](http://www.grandhotel-national.com) and [www.apartments-national.com](http://www.apartments-national.com) and, where applicable, will be used for identification within the framework of criminal proceedings as well as for civil and criminal action against the users concerned. This constitutes our legitimate interest in data processing within the meaning of Art. 6, Para. 1a of the GDPR:

### **Using Our Contact Form**

You have the option of using a contact form to contact us. We require the following information for this:

- Arrival
- Number of nights
- Number of adults
- Number of children
- First name, last name
- E-mail address

We use this information as well as information given voluntarily by you only so that we can reply to your contact request in the best way possible in a personalised manner. Processing this data is therefore required within the meaning of Art. 6, Para. 1 b of the GDPR for the purposes of implementing pre-contractual measures and is in our legitimate interest in accordance with Art. 6, Para. 1 f of the GDPR.

### **Subscribing to Our Newsletter**

Our website gives you the option of subscribing to our newsletter. Registration is required to do this. The following information is to be provided for the purposes of registering:

- First name
- Last name
- E-mail address
- Your choice of newsletter

The data above is required for data processing. We process this data only so that we can personalise the information and offers we send to you as well as better align such information and offers with your interests.

Upon registering, you give us your consent to process the data provided for the purposes of regularly sending the newsletter to the address you provided as well as performing a statistical analysis of usage behaviour and optimising the newsletter. This consent represents our legal basis for processing your e-mail address within the meaning of Art. 6, Para. 1a of the GDPR. We are entitled to commission third parties with the technical implementation of advertising measures and are entitled to pass on your data for this purpose (cf. No. 13 below).

There is a link at the end of each newsletter; this link can be used to unsubscribe from the newsletter at any time. As part of the process of unsubscribing, you can choose whether to specify your reason for unsubscribing. Data is only processed further in an anonymised form for the purposes of optimising our newsletter.

### **Making a Booking Via the Website, Correspondence, or a Telephone Call**

If you make bookings either via our website, by correspondence (e-mail or letter post) or by telephone call, we require the following mandatory data for the processing of the contract:

- Title
- First name, last name
- Postal address
- Date of birth
- Telephone number
- Language
- Credit card information
- E-mail address

We will only use this data as well as any other data given voluntarily by yourself (e.g. expected arrival time, vehicle number plate, preferences and comments) for the purposes of performing the respective agreement, unless otherwise stated in this data protection declaration or you have not specifically consented to this. Specifically, we will process the data to register your booking as requested, provide the services booked, contact you in the event of any ambiguities or problems and ensure the respective payment transaction is correct.

The legal basis for processing data for this purpose lies in fulfilling an agreement in accordance with Art. 6, Para. 1 b of the GDPR.

### **Cookies**

In many aspects, cookies help to make your visit to our website easier, more convenient and useful. Cookies are information files that your web browser automatically saves on the hard drive of your computer when you visit our website.

We use cookies to temporarily save the services you selected as well as your entries when completing a form on the website so that you do not have to re-enter your details when calling up a different subpage. Where applicable, cookies are also used so that you can be identified as a registered user after registering on the website without you having to log in again when calling up a different subpage.

Most Internet browsers accept cookies automatically. However, you can configure your browser so that cookies are not saved on your computer or a message always appears when you receive a new cookie.

Deactivating cookies can result in not being able to use all the functions of our website.

## **Social Media, Plugins & Tools**

### **Instagram Plugin**

Our website contains functions of the Instagram service. These functions are offered by Instagram Inc., 1601 Willow Road, Menlo Park, CA 94025, USA. If you are logged into your Instagram account, you can click the Instagram button to link the content of our pages with your Instagram profile. This means that Instagram can associate visits to our pages with your user account. As the provider of this website, we expressly point out that we receive no information on the content of the transmitted data or its use by Instagram. For more information, see the Instagram Privacy Policy:

<https://instagram.com/about/legal/privacy/>.

### **Youtube**

Our website uses plugins from YouTube, which is operated by Google. The operator of the pages is YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. If you visit one of our pages featuring a YouTube plugin, a connection to the YouTube servers is established. Here the YouTube server is informed about which of our pages you have visited.

If you are logged in to your YouTube account, YouTube allows you to associate your browsing behaviour directly with your personal profile. You can prevent this by logging out of your YouTube account.

YouTube is used to help make our website appealing. This constitutes a justified interest pursuant to Art. 6 (1) (f) DSGVO. Further information about handling user data, can be found in the data protection declaration of YouTube under <https://www.google.de/intl/de/policies/privacy>.

## **Tracking-Tools**

On our website, we use so-called tracking tools. These tracking tools will monitor your browsing behaviour on our website. This observation is made for the purpose of the needs-based design and continuous optimization of our website. In this context, pseudonymized usage profiles are created, and small text files stored on your computer ("cookies") are used. Information regarding your use of this website provided by the respective cookie is transmitted to the servers of the parties providing these services, where the information is saved and prepared for us. In addition to the information specified under „Calling Up Our Website“, we may receive the following information:

- The navigation path a visitor takes on the site
- The length of time spent on the website or subpage
- The subpage on which the visitor left the website
- The country, region, or city from which the website is accessed
- The country, region, or city from where an access is made,
- terminal device (type, version, color depth, resolution, width, and height of the browser window) and returning or new visitor

The information is used to analyse the use of the website, compile reports on website activities and to perform other services associated with website usage and Internet usage for the purposes of market

research and structuring our website in line with visitors' needs. If necessary, this information is also passed onto third parties, provided this is legally required or third parties process this data on our behalf.

The following tracking tools are used:

### **Google Analytics**

The provider of Google Analytics is Google Inc., an enterprise of holding company Alphabet Inc., which is based in the USA. Prior to transmitting data to the provider, the IP address is shortened within the member states of the European Union or in other contracting states part of the Agreement on the European Economic Area by means of activating the IP anonymization function ("anonymise IP") on this website. The anonymised IP address transmitted by your browser within the framework of Google Analytics is not combined with other data by Google. Only in exceptional cases is the full IP address transmitted by Google to a server in the USA and shortened there. In these cases, we use contractual guarantees to ensure that Google Inc. maintains an adequate level of data protection. According to Google Inc., the IP address will never be linked with other data concerning the user.

You can find more information of the web analysis services used on the Google Analytics website. You can find instructions on how to prevent your data from being processed by a web analysis service at <http://tools.google.com/dlpage/gaoptout?hl=de>].

### **Social Media Plug-Ins**

The website uses the social plugins described below. The plugins are disabled by default on our website whenever possible and therefore do not send any data. By clicking on the corresponding social media button, you can activate the plugins. If these plugins are activated, your browser will establish a direct connection with the servers of the respective social network as soon as you access one of our websites. The content of the plugin is transmitted by the social network directly to your browser and incorporated by this into the website. The plugins can be deactivated with a click. Further information can be found in the respective privacy statements of the providers.

### **TrustYou**

On our website, we use the Social Media Plugin of TrustYou Munich Center of Technology, Agnes-Pockels-Bogen 1, 80992 Munich. TrustYou is a service that collects reviews of hotels and processes them into reports. We use data from TrustYou to provide our visitors with an independent opinion. For more information, please refer to the [privacy policy of TrustYou](#)

### **Localina**

Localina is a table reservation service by localsearch, Swisscom Directories AG, Förrlibuckstrasse 62, 8005 Zürich. To provide the service, Localina places an entry in the website cookie. For more information, please refer to the [privacy policy of Localina](#)

### **TripAdvisor**

On our website, we use the social media plugin of TripAdvisor Inc., 400 1st Avenue, Needham, MA 02494 USA. TripAdvisor is an online travel industry company that collects reviews of its users on tourism deals and combines them with booking recommendations. We use the TripAdvisor widget to display customer opinions about us in a neutral manner. TripAdvisor we will place a cookie on your computer as soon as you open a page with the widget. [privacy policy of TripAdvisor](#)

## **Google Maps**

On certain pages you will find maps that are embedded from Google Maps. Google Maps is a product of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The maps are displayed by means of I-frame. This means that a third-party website is accessed in that area of the website. The data processing in this iframe is beyond our control. Google will associate the access with your Google account. Google Maps will write a cookie as soon as the page is loaded. If you would like to prevent this behavior, you can use the links given under "Option to Opt-Out/Opt-In" to disable the activation of Google cookies for your browser. For more information, please refer to Google's privacy policy

## **Newsletter usage evaluation**

For sending our newsletter, we use third party email marketing services. Therefore, our newsletter can contain a so-called Web Beacon (counting pixel) or similar technical means. A web beacon is a 1x1 pixel, non-visible graphic that is related to the user ID of each newsletter subscriber. The use of corresponding services enables the evaluation of whether the emails with our newsletter have been opened. In addition, the click behaviour of the newsletter recipients can also be recorded and evaluated. We use this data for statistical purposes and to optimize the content and structure of the newsletter. The counting pixel is deleted when you delete the newsletter. To prevent the use of tracking pixels in our newsletter, please set your email program so that in messages no HTML is displayed.

## **Data Processing Operations in the Context of Your Stay**

### **Data Processing Operations to Fulfil Statutory Reporting Obligations**

When staying at our hotel, we require the following information from you and any people accompanying you:

- First name, last name
- Postal address and canton (or region if you live outside of Switzerland)
- Date of birth
- Place of birth
- Nationality
- Official identification card and number (or identification document if you live outside of Switzerland)
- Day of arrival and departure
- Room number

We collect this information to fulfil statutory reporting obligations that come from hospitality or police legislation. Insofar as we are obligated in accordance with applicable regulations, we pass this information onto the responsible police authorities.

Complying with legal requirements constitutes our legitimate interest within the meaning of Art. 6, Para. 1 f of the GDPR.

### **Performing Related Services**

If you pay for addition services during your stay (for example, if you use items from the mini-bar or make use of the 'pay TV' service), the service and the time the service was procured are recorded for invoicing purposes. Processing this data is required to perform the agreement with us within the meaning of Art. 6, Para. 1 b of the GDPR.

## **Saving and Exchanging Data with Third Parties**

### **Booking Platforms**

If you make a booking via a third-party platform, we receive various personal information from the respective platform operator. Generally, the information provided is the data listed under No. 5 of this data protection declaration. In addition, any enquiries regarding your booking are forwarded to us. In specific terms, we will process the data to register your booking as requested as well as provide the services booked. The legal basis for processing data for this purpose lies in fulfilling an agreement in accordance with Art. 6, Para. 1 b of the GDPR.

Finally, we may be informed of any disagreements in relation to a booking by the platform operators. In this case, we may also receive information on the booking process, which can also include a copy of the booking confirmation as evidence that the respective booking was completed. We process this data to maintain and enforce our claims. This constitutes our legitimate interest within the meaning of Art. 6, Para. 1 f of the GDPR.

Please also observe the data protection information of the respective provider.

### **Saving and Linking Data Centrally**

We save the data specified above in a central electronic data processing system. Your personal data is systematically recorded and linked for processing your bookings and processing contractual services. For this purpose, we use software provided by Oracle Switzerland, Rainstrasse 1, 8143 Stallikon. We process this data within the framework of the software based on our legitimate interest within the meaning of Art. 6, Para. 1 f of the GDPR regarding ensuring customer-friendly and efficient customer data management.

### **Storage Period**

We only save personal data for as long as is necessary to make use of the tracking services mentioned above as well as the other processing operations within the scope of our legitimate interest. We store contract data for a longer period as this is stipulated by statutory storage obligations. Storage obligations that oblige us to store data come from regulations regarding reporting right and invoicing as well as from tax law. In accordance with these regulations, business-related communication, concluded contracts and accounting records are to be stored for up to ten years. If we no longer need this data to perform services for you, the data is locked. This means that the data may only be used for invoicing activities and tax purposes.

### **Passing Data onto a Third Party**

We only pass on your personal data if you have expressly consented to this, there is a legal obligation to do so, or this is required to enforce our rights – particularly to assert claims resulting from the contractual relationship. Furthermore, we pass your data onto third parties if this is required within the framework of using the website and performing the agreement (including beyond the website) – specifically, processing your bookings.

The service provider to whom the personal data collected via the website is forwarded or the service provider that has or can have access to this data is our web hosting service provider iWay AG, Badenerstrasse 569 in 8048 Zürich. The website is hosted on servers in Switzerland. Data is passed on for the purposes of providing and maintaining the functions of our website. This constitutes our legitimate interest within the meaning of Art. 6, Para. 1 f of the GDPR.



Finally, if you make a credit card payment on the website, we forward your credit card information to your credit card issuer as well as the credit card acquirer. If you choose to make a credit card payment, you are asked to enter all the information required. The legal basis for forwarding data lies in fulfilling an agreement in accordance with Art. 6, Para. 1 b of the GDPR. Regarding your credit card information being processed by these third parties, please also read the general terms and conditions as well as the data protection declaration of your credit card issuer.

### **Transferring Personal Data Abroad**

Grand Hotel National Ltd. is also entitled to transfer your personal data to third parties (commissioned service providers) abroad if this is necessary for the data processing described in this privacy policy. They are obliged to data protection to the same extent as we are. If the level of data protection in one country does not correspond to Swiss or European standards, we contractually ensure that the protection of your personal data always corresponds to that in Switzerland or in the EU.

### **Further Information**

#### **Right to information, correction, deletion, and restriction of processing; Right to data portability**

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

You can reach us for the purposes at our e-mail address [info@grandhotel-national.com](mailto:info@grandhotel-national.com). We may, at our sole discretion, require proof of identity to process your requests.

#### **Data security**

We use appropriate technical and organizational security measures to protect your stored personal data against manipulation, partial or complete loss, and unauthorized access by third parties. Our security measures are continuously improved in line with technological developments. You should always keep your information confidential and close the browser window when you have finished communicating with us, especially if you share your computer with others. We also take internal privacy very seriously. Our employees and the service companies commissioned by us have been sworn to secrecy and to comply with data protection regulations.

#### **Information on Data Transfer in the USA**

For the sake of completeness, we would like to point out to users with a apartments or registered office in Switzerland that there are supervision measures implemented by US authorities in the USA; these measures generally enable all the personal data of any person whose data has been transferred to the

USA from Switzerland to be saved. This takes place without any differentiation, restriction, or exception based on the pursued objective and without an objective criterion, which enables US authorities to access the data and restrict later use of the data to very specific and strictly limited purposes that justify any operations associated with accessing and using this data. Furthermore, we would like to draw attention to the fact that there are no judicial remedies in the USA for affected persons from Switzerland that allow them to receive access to the data concerning them and to correct or delete the data – in other words, there is no effective judicial protection against the general access rights of the US authorities. We are making those concerned explicitly aware of this legal and factual situation so that they can make a correspondingly informed decision as to whether they give their consent for their data to be used.

We would like to point out to users with a residence in an EU member state that – from the perspective of the EU – the USA does not offer an adequate level of data protection for a few reasons, including the issues referred to in this section. Insofar as we have explained in this data protection declaration that the recipients of the data (such as Google) are based in the USA, we will either make use of contractual agreements with these companies or ensure that these companies are certified in line with the EU or Swiss-US Privacy Shield to make sure that your data is adequately protected by our partners.

#### **Right to Lodge a Complaint with a Data Protection Supervisory Authority**

You have the right to lodge a complaint with a data protection supervisory authority at any time.

#### **General information**

This page was last updated in April 2021. If you have any questions or comments about our legal notices or data protection, please contact us at [info@grandhotel-national.com](mailto:info@grandhotel-national.com).