

Privacy Notice and Cookie Policy

INTRODUCTION

Welcome to the Leonardo Hotels' Privacy Notice.

Leonardo Hotels (as further explained below) respects your privacy and is committed to protecting your personal data. This privacy notice will inform how we collect and process your personal data. This includes when you, or someone on your behalf, makes a booking, requests information from us, contacts us (or we contact you), uses our website(s)/apps, links from our website(s)/apps, connects with us via social media, through our contact centre or hotels, or any other engagement we have with you (regardless of where you are based). It also tells you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Leonardo Hotels collects and processes your personal data in our dealings with you, including in providing accommodation and other services to you, including any data you may provide through our website, including by cookies.

This general privacy notice may be supplemented by other special notices, we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data (such as for the AdvantageCLUB members, where you find a special notice under <https://www.leonardo-hotels.com/leonardo-advantage-club-terms-and-conditions>). This privacy notice supplements our other special notices and is not intended to override them.

CONTROLLER

Leonardo Hotels is made up of different legal entities which are operated by Sunflower Management GmbH & Co. KG (“**Leonardo Management**”) and its affiliates within Europe (together “**Leonardo Hotels**”). Leonardo Hotels is part of Fattal Hotels Group. This privacy notice is issued on behalf of Leonardo Hotels so when we mention “Leonardo Hotels”, “we”, “us” or “our” in this privacy notice, we are referring to the relevant company in the Leonardo Hotels group responsible for processing your data. All companies of Leonardo Hotels operated by Leonardo Management are listed in [Annex 1 to this Policy](#). The Leonardo Hotels’ affiliate operating the hotels in which you stay or receive our services is the controller for the data processing of such accommodation service or other services’ receipt, together with Leonardo Management. You can book on this website other hotels of the Fattal Hotels Group which are not operated by Leonardo Hotels. The companies operating these hotels are listed in [Annex 2 to this Policy](#). Leonardo Management is the controller and responsible for this website.

Leonardo Management has appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice and the processing of your data by Leonardo Hotels. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

CONTACT DETAILS

Email address: dataprotection@leonardo-hotels.com

Postal address: Leonardo Hotels c/o Sunflower Management GmbH & Co. KG, Landsberger Allee 117a, 10407 Berlin, Germany

Telephone number: +49 (0) 30 6883220

You have the right to make a complaint at any time to the data protection authority supervising us, the Berlin Data Protection Authority (*Berliner Beauftragte für Datenschutz und Informationsfreiheit*, Friedrichstr. 219, 10969 Berlin, <https://www.datenschutz-berlin.de/>). We would, however, appreciate the chance to deal with your concerns before you approach the Authority so please contact us or our DPO in the first instance.

PLEASE INFORM US OF CHANGES

This version was last updated on 15.05.2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites nor their data processing. When you leave our website, we encourage you to read the privacy notice of every third-party website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth, place of birth, nationality, passport or ID card number, gender and car number plate.
- **Contact Data** includes billing address, home address, email address and fax and telephone numbers.
- **Special Requirements Data** includes health, disability and religious or dietary requirements if you notify us of any special needs and provide this information.
- **Booking and Transaction Data** includes bank account or payment card details and details about payments, purpose of stay and other details of your bookings, stays and other services you have purchased from us, and comments and responses to surveys you provided relating to our service.
- **Technical Data of your Visit to this Website** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **AdvantageCLUB and other Profile Data** includes your e-mail address registered for the AdvantageCLUB and password, membership number for Advantage Club any partner programs (e.g. Miles & More) services provided to you, your interests and preferences, feedback and survey responses. If you are an Advantage Club member, please also see the Leonardo AdvantageCLUB membership: [Data privacy notice \(https://www.leonardo-hotels.com/leonardo-advantage-club-terms-and-conditions\)](https://www.leonardo-hotels.com/leonardo-advantage-club-terms-and-conditions), which covers more detailed all aspects of our processing of data relating to the Advantage Club and prevails this privacy notice in this respect.
- **Usage Data** includes information about how you use our services, or link with us via social media and our website.

We will not collect all the data referred to above in each case, but only such data required for the specific [Legal Ground](#).

In the normal course, we will only collect **Special Categories of Personal Data** about you (this includes details about your religious beliefs, or information about your health needs and disabilities ("**Special Requirements Data**") to the extent that it is volunteered by you or on your behalf and is needed to cater to your requirements during your stay with us or other use of our facilities or services. We may also, however, need to process such information in the event of an accident or a medical or other emergency during your stay or your other use of our facilities.

We obtain limited information about **children** who are booked in to stay at our hotels (number, age, and where legally required other data such as name, date of birth, place of birth).

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with accommodation or our other services). In this case, we may have to cancel a booking or other service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Booking and Transaction Data by filling in forms or by corresponding with us by post, phone, email, via our website, on social media or otherwise. This includes personal data you provide when you:
 - make a booking at one of our hotels, whether for overnight stays, functions or conferences;

- check in to one of our hotels;
 - attend a function, conference or otherwise use the facilities at one of our hotels;
 - sign up to our Advantage Club;
 - subscribe to our newsletter and/or other publications;
 - request a brochure or other promotional or marketing materials to be sent to you;
 - enter a competition, or respond to a promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website or via social media, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, e-mails, server logs and other similar technologies. Please see our [Cookie Policy](#) for further details.
 - **Travel agencies or other third parties acting on your or your employer's behalf.** We may receive personal data about you if a booking is made for you by a travel agency, online portal or another third person, who may be a family member or travelling companion, or agent or other intermediary, working for you or, where you are travelling on business, your employer or other third party on your behalf (tour operators, Online Travel Agencies, Global Distribution Systems) reservation systems, and similar, Contact, Booking and Transaction Data from providers of technical, payment and delivery)
 - **Other third parties or publicly available sources.** We may receive personal data about you from third parties and public sources as set out below:
 - Web and social media analytics providers
 - Advertising networks
 - Web interaction technology providers
 - Identity and Contact Data from publicly available sources such as trade registers of EU member states
 - **Monitoring.** We may monitor and/or record:
 - (a) telephone calls;
 - (b) transactions and activities at all points of contact;
 - (c) web, social media and app traffic and activities

These are to ensure that we carry out your instructions accurately, for training purposes and to improve our services, and to ensure security and prevent fraud. For the greater security of our guests and patrons, and to prevent and detect crime, we use CCTV in and around our premises. To obtain information about our use of CCTV [contact us](#).

- **Business Contacts.** If you are a business contact of Leonardo Hotels, we may receive your data as you interact with our website, from trade fair visit/ workshops, personal meetings, corresponding with you through emails and phone, through contractual negotiation and agreements

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances (each a “**Legal Ground**”):

- **Performance of contract:** Where we need to provide the booked accommodation and services, or otherwise perform the contract we have entered into with you (or are about to enter into).

- **Consent:** Where you provide us your explicit consent to.
- **Legitimate interests:** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- **Comply with obligation:** Where we need to comply with a legal or regulatory obligation.
- **Vital interests:** In the case of any accident or a medical or other emergency, to protect your or another individual's vital interests, where you or they are not able to give consent.

For any processing that is based on your consent (mainly applying to online advertising to you), you have the right to withdraw such consent at any time by [Contacting us](#).

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We collect and process your personal data for purposes such as and:

- To make a booking, including reserving disability adapted accommodation, to provide accommodation and other services to you including meeting your specific health, disability, dietary and religious requirements, to manage your stay at the hotel and to monitor the use of our services, and to collect and recover money owed to us

Legal grounds: Performance of Contract, Consent (for meeting your specific health, disability, dietary and religious requirements), Legitimate interest (to improve our services)

- To deal with issues, complaints or disputes arising out of our relationship with you, and to prevent or detect crime, including fraud, To manage our relationship with you which will include:
 - Notifying you about changes to our terms or privacy policy
 - Asking you to leave a review or take a survey, or participate in a prize draw or competition
 - To improve our service to you

Legal grounds: Legitimate interest (to monitor and improve our services, to prevent crime and fraud, to keep our documents up to date)

- To administer and protect our business including our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you, and to make suggestions and recommendations to you about our services that may be of interest to you

Legal grounds: Legitimate interest (to develop our business and do marketing), Performance of Contract (where website is used to book or deliver service or manage AdvantageCLUB membership)

- To use data analytics to improve our website, services, marketing, customer relationships and experiences

Legal grounds: Consent (for use of cookies and analytics); Legitimate interest (to develop our business and do marketing)

- To deal with an accident or medical or other emergency

Legal grounds: Vital Interest

- To comply with local legislation (for example, storing of accounting documents or registration cards)

Legal grounds: Comply with obligation

We do not undertake automated decision making using your personal data.

MARKETING/PROMOTIONAL OFFERS

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Where you have agreed to receive it and provided your consent, we may use your Identity, Contact, Technical, Usage and AdvantageClub or other Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you.

You can revoke your consent and unsubscribe from our marketing communication at any time by following the opt-out links on any marketing message sent to you or by [Contacting us](#) at any time.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the categories of parties set out below for the purposes set out above.

- Other companies in the Leonardo Hotels group and Fattal Hotels group based within the European Economic Area, Switzerland or Israel involved in providing services to you, whether directly or for providing underlying infrastructure services on our behalf and instruction.
- External third parties, including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; these include contractors who provide services to you in their own name such as the third party provider offering Wi-Fi services, as well as our other providers acting as processor on our behalf and as instructed by us (such as the providers of our IT and CCTV infrastructure);
 - analytics and search engine providers that assist us in the improvement and optimisation of our services and website (as processor acting on our behalf and as instructed by us);
 - professional advisers, including lawyers, banks, auditors and insurers;
 - tax and customs authorities, public registry authorities, regulators and other authorities;

- entities involved in credit checking and anti-fraud activities, crime prevention/detection, risk assessment and management and dispute resolution.

Where these third parties are our processors, we require them to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Some of the third parties mentioned above, for example many professional advisers and authorities, are controllers who, like us, are subject to specific obligations under data protection law, and who will have their own privacy notices setting out how they deal with personal data.

6. INTERNATIONAL TRANSFERS

We share your personal data within the Leonardo Hotels group. All companies in the Group are currently based in the European Economic Area (EEA), Switzerland or Israel (where the EU Commission decided that these two countries provide an adequate level of data protection).

Though we do not seek actively to transfer personal data outside the EEA or countries with an adequate data protection, some of the external third parties we deal with are based outside the EEA or process personal data outside the EEA, so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we look to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission (as set out above, this especially applies for Switzerland and Israel).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. We do this for example in connection with our providers for booking through travel agents in the US.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please [Contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. Processors we appoint will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please [Contact us](#).

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to enable us to deal with your request or to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or we have received a number of requests. In this case, we will notify you and keep you updated.

YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on our legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to

processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following situations: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

10. WEBSITE COOKIES AND TRACKING PRIVACY POLICY

The Leonardo Hotels Group, represented by Sunflower Management GmbH & Co. KG ("**Leonardo Hotels**", "**we**" or "**our**") operates this website (<http://www.leonardo-hotels.com/>) (the "**Website**"). Leonardo Hotels respects the right to privacy of every individual who access and navigate our website. Leonardo Hotels takes the protection of users and follows the legally valid regulations regarding data protection. This Website Cookies and Tracking Privacy Policy outlines how we use any personal information we collect about you and your rights to access and correct the personal information we hold about you.

CONSENT

By using this Website you consent to the use of cookies in accordance with this Cookies Policy. You will have seen a pop up to this effect on your first visit to this website; although it will not usually appear on subsequent visits you may withdraw your consent at any time by following the instructions below.

DISABLING COOKIES

If you do not agree to the use of these cookies please disable them by following the instructions for your browser set out [here](http://allaboutcookies.org) (<http://allaboutcookies.org>). Please note that some of the services will not function so well if cookies are disabled.

Where the organization setting the cookie provides an automated disabling tool in respect of its cookie(s) we list the name of that organization, the category of cookies it sets together with a link to its automated disabling tool. In all other cases, we list the names of the cookies themselves and their source at the date of this Cookies policy so that you can easily identify and disable them if you want through your browser controls.

Some browsers make it possible for you to signal that you do not want your internet browsing activity to be tracked. Disabling tracking may interfere with some uses of the Website and the services provided on the Website.

After your initial visit to the Website we may change the cookies we use. This cookies policy available under <http://www.leonardo-hotels.com/privacy-notice-and-cookie-policy> will always allow you to know who is placing

cookies, for what purpose and give you the means to disable them so you should check it from time to time.

WHAT IS A COOKIE?

A cookie is a small text file containing small amounts of information which is placed by a website onto a computer or device. Cookies are designed to assist a computer or device to remember something the user has done within that website, *e.g.*, remembering that the user has logged in to, or which buttons have been clicked. Cookies cannot carry viruses or install malware.

WHY DOES LEONARDO HOTELS USE COOKIES AND HOW LONG DO WE STORE THEM?

Leonardo Hotels uses cookies with technologies to recognize customers and to understand and facilitate your browsing and booking behavior. We use this information to improve our websites to offer the best experience for our guests. Our Website also uses cookies and similar technologies placed by our carefully selected third party partners.

Cookies are useful because they allow a website to recognize a user's device. Cookies allow you to navigate between pages efficiently, remember preferences and generally improve the user experience. They can also be used to tailor advertising to your interests through tracking your browsing across websites.

Session cookies are deleted automatically when you close your browser and persistent cookies remain on your device after the browser is closed (for example to remember your user preferences when you return to the site).

WHAT TYPES OF COOKIES DOES LEONARDO HOTELS USE?

We describe the categories of cookies Leonardo Hotels and its affiliates and its contractors use below.

Strictly Necessary Cookies

These cookies are essential in order to enable you to move around the website and use its features. Without these cookies, services you have asked for (such as navigating between pages) cannot be provided.

Performance Cookies

We make use of analytic cookies to analyse how our visitors use our Website and to monitor Website performance. This allows us to provide a high quality experience by customizing our offering and quickly identifying and fixing any issues that arise. For example, we might use performance cookies to keep track of which pages are most popular, which method of linking between pages is most effective, and to determine why some pages are receiving error messages. We might also use these cookies to highlight articles or site services that we think will be of interest to you based on your usage of the website. The information collected by these cookies is not associated with your personal information by us or by our contractors.

The Website currently uses the following analytic cookies [from Google Analytics]

| Cookie Name | Source | Purpose | Further Information |
|-------------------|-----------------|--|---|
| _g* | Google | This cookie is used to collect information about how visitors use our site. We use the information to compile reports and to help us improve our site. The cookie collects information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. | Data are retained for 36 months, as of the last user interaction. Click here for Google's privacy policy in respect of Google Analytics http://www.google.com/analytics/learn/privacy.html You may opt out of tracking by Google Analytics by visiting https://tools.google.com/dlpage/gaoptout?hl=en-GB |
| LeoCookie | Leonardo Hotels | Cookie to remember opt-out | |
| Eid Uid zdi | criteo | Track users behaviour | |

Website Functionality Cookies

We make use of cookies to provide you with certain functionality. For example, to remember choices you make (such as your user name, language or the region you are in), or to recognize the platform from which you access the site, and to provide enhanced and more personal features. These cookies are not used to track your browsing on other sites.

Advertising Cookies

Advertising cookies (or targeting cookies) collect information about the browsing habits associated with your device and are used to make advertising more relevant to you and your interests. They are also used by services provided by third parties on this Website, such as 'Like' or 'Share' buttons in addition to providing the requested functionality. Third parties provide these service in return for recognizing that you (or more accurately your device has) have visited a certain website. These third parties put down advertising cookies both when you visit our Website and when you use their services and navigate away from our Website. Their privacy practices are set out below:

| Cookie Name | Source | Purpose | Further Information |
|----------------------|--------|--------------------|---|
| MUID* SRCH* _U | Bing | Retargeting pixels | https://privacy.microsoft.com/en-us/privacystatement#maincookieessimilartechologiesmodule |

HTML email web beacons

Our emails may contain a single, campaign-unique "web beacon pixel" to tell us whether our emails are opened and verify any clicks through to links within the email. We may use this information for purposes including determining which of our emails are more interesting to you, to query whether users who do not open our emails wish to continue receiving them. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you should select to receive emails from us in plain text rather than HTML.

Use of IP addresses and web logs

We may also use your IP address and browser type to help diagnose problems with our server, to administer our Website and to improve the service we offer to you. An IP address is a numeric code that identifies your computer on the internet. Your IP address might also be used to gather broad demographic information.

We may perform IP lookups to determine which domain you are coming from (e.g. google.com) to more accurately gauge our users' demographics.

COOKIES POLICY DOES NOT COVER THIRD PARTY WEBSITES

Please note that this cookies policy does not apply to, and we are not responsible for, the privacy practices of third party websites which may be linked to this Website.

CHANGES TO THE COOKIES POLICY

We may update this cookies policy and we would encourage you to review the policy from time to time to stay informed of how we are using cookies. This cookies policy was last updated on May 2018.

ANNEX 1

| HOTEL | OPERATING COMPANY |
|---|-------------------------------------|
| Alden Luxury Suite Hotel Zurich | Fattal Hotels Zürich GmbH |
| Leonardo Hotel Edinburgh Murrayfield | Leonardo Portland Operation Limited |
| Leonardo Hotel Edinburgh City | Leonardo Portland Operation Limited |
| Leonardo Inn Hotel Glasgow West End | Leonardo Portland Operation Limited |
| Leonardo Boutique Hotel Huntingtower Perth | Leonardo Portland Operation Limited |
| Leonardo Airport Hotel Berlin Brandenburg | Yuan GmbH |
| Leonardo Boutique Hotel Barcelona Sagrada Familia | Paimac Investments, S.L.U. |
| Leonardo Boutique Hotel Madrid | Leonardo Hotels Opco Madrid, S.L. |
| Leonardo Boutique Hotel Munich | Sunflower Management GmbH & Co. KG |
| Leonardo Boutique Hotel Righof Zurich | Fattal Hotels Zürich GmbH |
| Leonardo Hotel & Residenz München | Apart Hotels & Residences GmbH |
| Leonardo Hotel Aachen | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Amsterdam City Center | Leonardo Hotels (Netherlands) B.V. |
| Leonardo Hotel Antwerpen | HOTEL FLORIDA NV |
| Leonardo Hotel Bad Kreuznach | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Barcelona Gran Via | Leonardo Hotels Opco Madrid, S.L. |
| Leonardo Hotel Barcelona Las Ramblas | Bardalito Investments, S.L.U. |
| Leonardo Hotel Berlin | Sunflower Management GmbH & Co. KG |
| Leonardo Boutique Hotel Berlin City South | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Berlin City West | Queens Moat Houses Hotel GmbH |
| Leonardo Hotel Berlin Mitte | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Budapest | Fattal Hotels Kft. |
| Leonardo Hotel Charleroi City Center | WERSO SA |
| Leonardo Hotel Dresden Altstadt | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Düsseldorf Airport - Ratingen | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Düsseldorf City Center | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Frankfurt City Center | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Frankfurt City South | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Granada | Paimac Investments, S.L.U. |

| | |
|--|-------------------------------------|
| Leonardo Hotel Hamburg Airport | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Hamburg City North | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Hamburg Elbbrücken | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Hamburg-Stillhorn | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Hannover | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Hannover Airport | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Heidelberg | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Heidelberg City Center | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Heidelberg-Walldorf | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Karlsruhe | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Köln | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Köln-Bonn Airport | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel London Heathrow Airport | Leonardo Heathrow Limited |
| Leonardo Hotel Madrid City Center | Leonardo Hotels Opco Madrid, S.L. |
| Leonardo Hotel Mannheim City Center | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Mannheim-Ladenburg | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Milan City Center | Leonardo Hotel Hermitage S.r.l. |
| Leonardo Hotel Mönchengladbach | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel München City Center | Piettal Operation GmbH |
| Leonardo Hotel München City West | Apart Hotels & Residences GmbH |
| Leonardo Hotel Munich Arabellapark | Queens Moat Houses Hotel GmbH |
| Leonardo Hotel Munich City East | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Munich City North | Piettal Operation GmbH |
| Leonardo Hotel Munich City Olympiapark | Piettal Operation GmbH |
| Leonardo Hotel Munich City South | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Nürnberg | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Royal Berlin Alexanderplatz | Leonardo Royal Berlin Lease GmbH |
| Leonardo Hotel Vienna | Sunflower Hotelverwaltungs GmbH |
| Leonardo Hotel Völklingen | Sunflower Management GmbH & Co. KG |
| Leonardo Hotel Weimar | Elba Weimar Operating GmbH & Co. KG |
| Leonardo Hotel Wolfsburg City Center | Sunflower Management GmbH & Co. KG |

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|---|------------------------------------|
| Leonardo Inn Hotel Hamburg Airport | Sunflower Management GmbH & Co. KG |
| Leonardo Royal Hotel Amsterdam | Leonardo OpCo Overamstel B.V. |
| Leonardo Royal Hotel Baden-Baden | Sunflower Management GmbH & Co. KG |
| Leonardo Royal Hotel Düsseldorf Königsallee | Sunflower Management GmbH & Co. KG |
| Leonardo Royal Hotel Edinburgh Haymarket | Leonardo Edinburgh Limited |
| Leonardo Royal Hotel Frankfurt | Sunflower Management GmbH & Co. KG |
| Leonardo Royal Hotel Köln Am Stadtwald | Sunflower Management GmbH & Co. KG |
| Leonardo Royal Hotel Mannheim | Sunflower Management GmbH & Co. KG |
| Leonardo Royal Hotel Munich | Sunflower Management GmbH & Co. KG |
| Leonardo Royal Hotel Nürnberg | Sunflower Management GmbH & Co. KG |
| Leonardo Royal Hotel Ulm | Sunflower Management GmbH & Co. KG |
| Leonardo Royal Hotel Warsaw | Leonardo Hotels Warsaw Sp. z o.o. |
| Leonardo Royal Hotel Venice Mestre | Leonardo Hotels (Italy) S.r.L. |
| Venetia Palace Hotel | Leonardo Hotels (Italy) S.r.L. |
| NYX Hotel Munich | Sunflower Management GmbH & Co. KG |
| NYX Hotel Madrid | Paimac Investments, S.L.U. |
| NYX Hotel Milan | Leonardo Hotels (Italy) S.r.l. |
| NYX Hotel Prague | Fattal Leonardo Prague s.r.o. |
| NYX Hotel Bilbao | Paimac Investments, S.L.U. |
| NYX Hotel Mannheim | Sunflower Management GmbH & Co. KG |
| Leonardo Boutique Hotel Düsseldorf | Sunflower Management GmbH & Co. KG |
| Leonardo Inn Hotel Aberdeen Airport | Speedbird Developments Limited |

ANNEX 2

| HOTEL | OPERATING COMPANY |
|---|--------------------------|
| Herods Boutique Eilat Hotel | Fattal Hotels LTD |
| Herods Dead Sea Hotel | Fattal Hotels LTD |
| Herods Herzliya Hotel | Fattal Hotels LTD |
| Herods Palace Eilat Hotel | Fattal Hotels LTD |
| Herods Tel Aviv Hotel by the Beach | Fattal Hotels LTD |
| Herods Vitalis Eilat Hotel | Fattal Hotels LTD |
| Hotel Rothschild 22 Tel Aviv | Fattal Hotels LTD |
| Leonardo Art Tel Aviv By the Beach (ex Marina) | Fattal Hotels LTD |
| Leonardo Beach Tel aviv (ex Leonardo Basel) | Fattal Hotels LTD |
| Leonardo Boutique Hotel Jerusalem | Fattal Hotels LTD |
| Leonardo Boutique Hotel Rehovot | Fattal Hotels LTD |
| Leonardo Boutique Hotel Tel Aviv | Fattal Hotels LTD |
| Leonardo City Tower Hotel Tel Aviv | Fattal Hotels LTD |
| Leonardo Club Hotel Dead Sea | Fattal Hotels LTD |
| Leonardo Club Hotel Eilat - All Inclusive | Fattal Hotels LTD |
| Leonardo Club Hotel Tiberias - All Inclusive | Fattal Hotels LTD |
| Leonardo Hotel Ashkelon | Fattal Hotels LTD |
| Leonardo Hotel Jerusalem | Fattal Hotels LTD |
| Leonardo Hotel Negev | Fattal Hotels LTD |
| Leonardo Hotel Tiberias | Fattal Hotels LTD |
| Leonardo Inn Hotel Dead Sea | Fattal Hotels LTD |
| Leonardo Laura Beach & Splash Resort | Fattal Hotels LTD |
| Leonardo Plaza Cypria Maris Beach Hotel & Spa | Fattal Hotels LTD |
| Leonardo Plaza Haifa | Fattal Hotels LTD |
| Leonardo Plaza Hotel Ashdod | Fattal Hotels LTD |
| Leonardo Plaza Hotel Dead Sea | Fattal Hotels LTD |
| Leonardo Plaza Hotel Eilat | Fattal Hotels LTD |
| Leonardo Plaza Hotel Jerusalem | Fattal Hotels LTD |
| Leonardo Plaza Hotel Tiberias | Fattal Hotels LTD |
| Leonardo Privilege Hotel Eilat - All Inclusive | Fattal Hotels LTD |
| Leonardo Royal Resort Hotel Eilat | Fattal Hotels LTD |
| Leonardo Suite By the Beach | Fattal Hotels LTD |
| NYX Hotel Tel Aviv | Fattal Hotels LTD |
| SENTIDO Cypria Bay by Leonardo | Fattal Hotels LTD |
| U Boutique Hotel Kinneret by the Sea of Galilee | Fattal Hotels LTD |
| U Coral Beach Club Eilat - All Inclusive | Fattal Hotels LTD |
| U Magic Palace Eilat Hotel | Fattal Hotels LTD |
| U Suites Eilat Hotel | Fattal Hotels LTD |
| U Sunrise Club Eilat Hotel - All Inclusive | Fattal Hotels LTD |