



## Privacy Policy

The Leonardo Hotels Group, represented by Sunflower Management GmbH & Co.KG, 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 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.

Your personal data are recorded in different ways. These include in specific:

- When you contact Leonardo Hotels through a form available on our website, we usually collect the following details (if provided): name, email address, telephone number, member ID, reservation number, travel dates and any message that you provide. This information is used by Leonardo Hotels to reply to your request.
- When you book a room using the Leonardo Hotels website we collect your title, name, surname, address, email address, telephone number and payment card or Leonardo AdvantageCLUB account details. This allows us to process the booking for you, identify you on arrival at one of our Leonardo Hotels properties and contact you in relation to your reservation.
- Leonardo Hotels also offers the possibility to enroll for the loyalty program Leonardo AdvantageCLUB. Upon registration we collect your title, first name, surname, birth date, address, email address, telephone number and a password. This allows us to identify you when you return to our website and means you do not need to enter this information again when booking a room.
- When you enter any competition, promotion or prize draw on our website, we may collect your name, address, email address and telephone number. This information is used for the purpose of entering you in the competition, promotion or prize draw and for the purposes explained in the terms and conditions applicable to the competition, promotion or prize draw.
- If you agree, we will also collect your name, address, email address and telephone number so that we can keep you informed of news and promotions about the Leonardo Hotels Group or about our loyalty program Leonardo AdvantageCLUB. If you have agreed to receive such marketing communications (such as newsletter, check-out e-mail, SMS promotion, etc.) you may opt out or change your marketing preferences at any time by contacting us.
- Due to technical reasons, the information provided by your browser is saved automatically in Server Log Files when visiting our website. This means that we log the IP address of the machine you use to access our website. The IP address is a unique number that is used on the Internet to identify a unique computer for the purposes of allowing computers to communicate with each other.



Under no circumstances will collected information be transmitted to third parties, except when the latter is required for contract management or for service delivery. A transmission to authorities or state institutions that are entitled to receive information is justified only if said transmission is subject to a statutory obligation to provide information or if it is decided judicially. In such cases, the transmission is always limited to the minimum extent required.

In this connection, you may always informally exercise your right free of charge under the German Data Protection Act (BDSG):

- The right to information (§ 6, 19, 34 BDSG) concerning the stored personal data, its origin, the recipients or categories of recipients and the purpose of storage
- The right to rectification, blocking or deletion (§ 6, 20, 35 BDSG) of personal data
- The right to object, effective for the future (§ 28 BDSG)

You may at any time revoke consent granted for the collection of personal information, its storage and use thereof, without stating any reasons.

Address your enquiries or your general comments or complaints about data privacy to the following contact:

Sunflower Management GmbH & Co.KG  
Landsberger Allee 117A  
D 10407 Berlin  
T: 0049 (0)30 688 322 0  
F: 0049 (0)30 688 322 301  
E: [info@leonardo-hotels.com](mailto:info@leonardo-hotels.com)  
W: [www.leonardo-hotels.com](http://www.leonardo-hotels.com)

All technical and organizational, physical and logical facilities and measures in the field of data protection, IT and information security are used to protect against damage, destruction or unauthorized access to stored data, as well as to achieve the goals of protection of confidentiality, availability and integrity.

### **Acceptance, validity and modification of the privacy policy**

By using our website, you implicitly agree to accept the use of your personal data as specified above. This present statement of data protection conditions was last updated on 22.03.2016. As our website evolves, and new technologies come into use, it may become necessary to amend the statement of data protection conditions. The Leonardo Hotels Group reserves the right to modify its data protection conditions at any time, with effect as of a future date. We recommend that you reread the latest version from time to time.



### **Further information**

Persons under 18 years of age should not disclose personal data to us without the consent of parents or guardians. Without parental consent, we do not request, record or disclose to third parties any personal information from children and persons under the age of 18.

### **Third parties**

We may disclose your personal information to service providers for the purpose of providing services to you, for example the processing and fulfillment of your booking.

In addition, we may disclose your information to a buyer in the event that we or any of our assets are acquired by a third party (as your information may be one of the transferring assets).

We may also disclose any of your personal information to any third party where we are under a duty to do so in order to comply with any legal obligation, or in order to enforce or protect any of our rights, property or safety (or those of our customers).

Where personal information is processed on our behalf by third parties (such as for the purposes of processing your meeting room booking), we will ensure that they keep your information secure.

### **Cookies**

If you visit one of our websites, it is possible that we store information in the form of a cookie on your computer. Other than the internet protocol address, no other personal data of the user is stored. This information will help us to automatically recognize you on your next visit to our websites and make navigation easier.

1. This site uses cookies which are small text files which contain small amounts of information that a website can send to, and store on, your computer or device through your browser. Cookies may be used by us to provide you with, for example, customized information from our website to make it more user-friendly. Cookies allow us to understand who has seen which pages and advertisements, to determine how frequently particular pages are visited and to determine the most popular areas of our website.

2. We are required to provide you with clear and comprehensive information about the cookies which we use on the site and to obtain your consent to the use of the cookies. In order to comply with these requirements we have prepared a cookies policy setting out information about cookies, detailing the cookies we use and providing information on how to manage cookies on your computer.

You can read our Cookie Policy in the following pages.



## **Security**

Where necessary, and in common with other websites, we use SSL (Secure Sockets Layer) encryption to ensure that personal information provided to us is not visible to anybody else when in transit between your computer and our servers. You can tell when SSL is in use by the presence of a small "padlock" symbol in the status bar of your web browser.

## **External Links**

If you use external links that are offered through our websites, this privacy statement does not extend to these links. In so far as we provide links, we assure you that at the time the links were setup there were no legal violations on the linked Internet sites. However, we have no control over the compliance with privacy and security regulations by other providers. Therefore, we recommend that you obtain more information from the websites of other providers concerning their data protection declarations.

## **Google Analytics**

This website uses Google Analytics, a web analytics platform powered by Google. Google Analytics uses cookies, which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your website usage (including your IP address) will be transmitted to and stored by Google on servers located in the US. In case of activation of the IP anonymization, Google will truncate the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On behalf of the website provider Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage to the website provider. Google will not associate your IP address with any other data held by Google. You may reject the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website.

In addition to this, you can prevent Google (and IP address) by downloading and installing the related browser plug-in.

## **Leonardo Hotels on social network**

Our Leonardo Hotels website uses social plug-ins of the social networks Facebook, Twitter, Instagram, Google+ and YouTube. Plug-ins are marked with the corresponding icons. When you visit a page that contains such a plug-in, your browser establishes a direct connection with Facebook, Twitter etc. servers. The



contents of the plug-in is transmitted from Facebook, Twitter, etc. directly to your browser and integrated by it into the website.

By integrating the plug-ins, the platforms receive information that you have visited the respective page on our website. If you are you logged into e.g. Facebook, Facebook can assign your visit to your account. When you interact with the plug-ins, for example, by clicking on the button or leaving a comment, the corresponding information is sent directly from your browser to Facebook and stored there. For details about the Privacy policies for these channels, please view the full information displayed on the respective websites.

From time to time Leonardo Hotels may run competitions or other applications within Facebook or other social networking site. These applications may drop cookies onto your devices and you are advised to read the terms of the application for more information.

If you do not want Facebook to gather information about you on our website, you must log out on Facebook before you visit our website.

### **Changes to our privacy policy**

We keep our Privacy Policy under regular review and we will place any updates on this webpage. This Privacy Policy was last updated on 22.03.2016.



## Cookie Policy

### 1. 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 hotels.com, or which buttons have been clicked.

Cookies cannot carry viruses or install malware.

By using the Leonardo Hotels website and mobile website, you are agreeing to our Privacy and Cookie policies and consent to the use of cookies by us and our carefully selected third party partners as described in these policies.

### 2. 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 websites also uses cookies and similar technologies placed by our carefully selected third party partners.

### 3. Types of Cookies

A cookie can be classified by its lifespan and the domain to which it belongs. By lifespan, a cookie is either a:

- session cookie which is erased when the user closes the browser;
- persistent cookie which remains on the user's computer/device for a pre-defined period of time.
- As for the domain to which it belongs, there are either:
- first-party cookies which are set by the web server of the visited page and share the same domain;
- third-party cookies stored by a different domain to the visited page's domain. This can happen when the webpage references a file, such as JavaScript, located outside its domain.



## **5. Do I have to accept cookies?**

To make full use of the Leonardo Hotels websites, cookies need to be enabled on your browser; certain features will not work if you reject cookies. Cookies are used to offer a customized experience when browsing the website on your computer, tablet, mobile phone and by using applications.

If you choose not to allow cookies you will still be able to browse the site but your experience will not be as beneficial as if you have cookies enabled. Without persistent cookies (see definition above) you will not be able to book a room on the Leonardo Hotels websites or manage any existing bookings as cookies are required for these processes to be completed.

The main benefits for accepting cookies will allow us to improve your experience at Leonardo Hotels and remembering information to customize your preferences to you.

If you do not agree to such use, please adjust your browser settings accordingly.

## **6. Are cookies used on web, mobile, tablet and apps?**

Yes, cookies, or other data storing devices are used on all of our digital channels (desktop, mobile and tablet).

## **7. Do cookies contain my personal information?**

No, cookies do not contain confidential information such as your home address, telephone number or credit card details.

## **8. Managing your cookies**

You have different options to manage the cookies on your computer or device. You can change your browser settings to prevent cookies from being accepted, or, depending on which browser you are using, you might be able to receive an alert when a website is trying to place a cookie on your browser. With most browsers you can allow first party cookies to be set but refuse third party cookies.

If you change your cookie preferences, you will still be able to browse around the website but certain functions will not be available, for example you will not be able to book a room or manage any existing bookings as cookies are required for these processes to be completed. Also, by not allowing cookies, some of our standard functionality will not work, for example deleting certain cookies.

Your browser's 'help' menu should tell you how to block cookies or change your cookie settings. How you adjust your cookie settings will depend on the browser you are using.



You can delete cookies stored in your browser by using a function in your browser. This does not mean you won't collect cookies in the future, however it gives you freedom to delete your cookies after you have been navigating online. This function is often known as 'clearing cookies'.

Clearing your cookies on one browser of one device does not automatically clear them on another. You need to clear all browsers on all channels independently.