

## PRIVACY NOTICE

### 1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our application **aaconcierge**.

By providing us with your data, you warrant to us that you are over 13 years of age.

**aaconcierge AG** is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

#### Contact Details

Full name of legal entity: **aaconcierge AG**

Email address: **[gdpr-support@aaconcierge.ch](mailto:gdpr-support@aaconcierge.ch)**

Postal address: Titlisstrasse 9, 6390 Engelberg, Switzerland

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at **[gdpr-support@aaconcierge.ch](mailto:gdpr-support@aaconcierge.ch)**

### 2. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

Personal data means any information capable of identifying an individual. It does not include anonymized data.

We may process the following categories of personal data about you:

- **Communication Data** that includes any communication that you send to us whether that be through the manual entry through application, through email, text or any other communication that you send us. We process this data for the purposes of personalized communicating with you as a tenant, for record keeping and for the establishment, pursuance or defense of legal claims. This data may include your name and last name, email address, and phone number. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Identification and financial data** that includes data relating to your birthday details, passport photos, ID card photos, selfie photos, your residence address that includes the street and number, city and zip code. We process this data for the purposes of your identification and security of our building and tenants and for the check in purposes. Our lawful ground for this processing is the performance of a contract between you and us.
- **Technical Data** that includes data about your use of our application such as your IP address, your login data, details about your device, and other technology on the devices you use to access our application. The source of this data is from third-party services. We process this data for the security purposes. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our application and our business.
- **Other data** that includes guest location for providing relevant information and services. This data is manually entered by the guest. Our lawful ground for this processing is consent.

#### Sensitive Data

We need to collect the following sensitive data about you in order to deliver the services in the most secure way. The sensitive data required are the following: nationality and biometric data.

We require your explicit consent for processing sensitive data, so when you submit your details, we will send you a further communication asking for you to confirm your consent to this processing.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver services to you).

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at [gdpr-support@aaconcierge.ch](mailto:gdpr-support@aaconcierge.ch). In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

We collect all the data directly from you.

### **3. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below:

- Other companies in our group who provide services to us.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Government bodies that require us to report processing activities.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

### **4. INTERNATIONAL TRANSFERS**

We share your personal data within our group of companies which involves transferring your data outside the European Economic Area (EEA).

We are subject to the provisions of the General Data Protection Regulations that protect your personal data. Where we transfer your data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such:

- If we use US-based providers that are part of privacy framework (such as the successor to the EU-US Privacy Shield), we may transfer data to them, as they have equivalent safeguards in place;
- Where we use certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

### **5. DATA SECURITY**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorization. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

## 6. DATA RETENTION

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. We are keeping your data for the period of the duration of the tenant application process. If you conclude Lease agreement with us, than your personal data is kept trough duration of the contract.

After contract termination we will keep your data for 30 months, but for tax purposes the law requires us to keep basic information about our users (including Contact, Identity, Financial and Transaction Data) for 5 years after the expire of your Lease agreement.

If you are using **aaconcierge** for the short short-term rental, we are keeping your personal data from the date you made reservation. We are keeping your personal data for the period of 60 months after you check-out.

Should you wish to have your data expunged prior to the expiration of a sixty-month period subsequent to your departure, please be advised that the minimum tenure for such a petition is six months following check-out. This stipulation is in place as **aaconcierge ag** is obliged to retain said data for a specified duration in compliance with legal mandates. To initiate a request for early termination of your account, you are required to submit a formal in-application request.

In some circumstances we may anonymize your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 7. YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

If you wish to exercise any of the rights set out above, please email us at [gdpr-support@aaconcierge.ch](mailto:gdpr-support@aaconcierge.ch).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

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 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 you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the data protection authority of the country in which you are based. We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

## 8. UPDATES TO POLICY

This Policy applies from 01.01.2024. In case of changes, we will inform you in advance. It is considered that you agree with the new version of this Policy, if you continue to use our application, which is determined by this Policy, since the new version of this Policy comes into force.