

Data Protection

Diana Group Hotels are dedicated to protecting your privacy and safeguarding your personally identifiable information. Our aim is to consistently exceed our guests' expectations in terms of the products and services we provide to our business and leisure travelers. We strive to create an experience that is responsive to our guests' needs by using the information you entrust us with responsibly. Diana Group Hotels are committed to respecting your privacy and adhering to the principles of applicable data protection and privacy laws throughout the world.

We have provided this Privacy Statement as an explanation of the information we collect, how we use it, and how the use of this information can benefit your experience on our web site and during your relationship with us. We wish to help you make informed decisions, so please take a moment to read the sections below.

In order to provide multiple access points to the services and products we offer, Diana Group Hotels operate directly, or through affiliates or service providers, including www.dianahotels.gr and www.webhotelier.net. Each of these web sites may ask for and collect personally identifiable information in order to enhance your experience and provide you with relevant information.

TYPES OF INFORMATION WE COLLECT:

Diana Group Hotels information about our guests and visitors to our web sites so that we can provide an experience that is responsive to our guests' and visitors' needs. Information may be collected as part of: (1) fulfilling reservation or information requests, (2) purchasing products, (3) registering for loyalty membership, (4) submitting a job application, or (5) responding to communications from us (e.g., surveys, promotional offers, or reservation confirmations). We endeavor to collect information only with your knowledge and with your permission if necessary. The types of personally identifiable information that we collect may include your name, home, work and e-mail addresses, telephone and fax numbers, social network profiles, date of birth, gender, and lifestyle information such as room preferences, leisure activities, names and ages of children, and other information necessary to fulfill special requests (e.g., health conditions that require special accommodation).

Diana Group Hotels may also collect non-personally identifiable information about you, such as your use of our web sites, communication preferences, travel habits, aggregated data relative to your stays, and responses to promotional offers and surveys.

PURPOSE FOR COLLECTION, PROCESSING, AND DISCLOSURE:

Collection & Use

Diana Group Hotels are fully committed to providing you with information about the collection and use of personally identifiable information furnished by, or collected from, visitors while using our web sites, products and services. It is our practice not to ask you for information unless we need it or intend to use it. Some of the primary purposes for collecting your personally identifiable information are as follows:

- providing services such as processing a transaction (e.g., making a reservation, fulfilling a request for information, or completing a product order)
- marketing and communications with you in relation to the products and services offered by Diana Group Hotels, our strategic marketing partners, and other trusted third parties
- performing market research via surveys to better serve your needs, improve the effectiveness of our web sites, your hotel experience, our various types of communications, advertising campaigns, and/or promotional activities

You will always be offered the choice not to submit your personally identifiable information or to decide what communications you want to receive from us. However, doing so may cause certain transactions to become affected. For example, not providing a name will prevent the processing of reservations.

Processing and Disclosure

In most cases, the information you provide is added to a local or global database. In the course of processing your information, it may be necessary to transfer your personally identifiable information to Diana Group Hotel's affiliates, and/or third party service providers for the purposes outlined within this Privacy Statement. As a general practice, Diana Group Hotels do not sell, rent, or give physical possession of your personally identifiable information to unaffiliated third parties outside the Diana Group Hotel's system. Situations in which we may disclose your information to others include:

- When we have received your consent to do so.
- In situations where sharing or disclosing your information is required in order to offer you products or services you desire (e.g., a vacation package).
- When companies or services providers that perform business activities on behalf of Diana Group Hotels require such information (e.g., credit card processing, customer support services, market research administration or database management services).
- To comply with legal or regulatory requirements or obligations in accordance with applicable law or court order.
- In case of emergency such as to safeguard the life, health, or property of an individual.

If information is shared as mentioned above, we seek to limit the scope of information that is furnished to the amount necessary for the performance of the specific function. Unless otherwise precluded by legal process, we require third parties to protect your personally identifiable information and abide by applicable privacy laws and regulations:

- *Protection of personal information, as applicable by the International & European Law regarding E-Commerce (Directive no 2000/31/EU, PD no 131/2003)
- *Consumer's protection law (R. 2251/1994) regarding online sales
- *Relative regulations of the Greek Law (R.2472/1997) regarding protection of personal data as ruled by the President of the Committee of Protection Of Personal Data

CONSENT:

As part of our commitment to keep you informed, we may mail, e-mail, telephone, or contact you by other means to notify you of new Diana Group Hotels products and services, or upcoming special offers, events, enhancements, or other relevant information that may be of interest to you. You may also receive mailings or other communications from carefully selected third parties. We always offer you the option to decline any or all of these communications by following the directions included in our e-mails or other communications, or by contacting us directly.

If you are a member of Diana Group Hotels loyalty club, you may also change your communication choices by updating your e-mail preferences in your individual membership profile.

We would like to keep all of our guests and visitors informed and equally able to take advantage of the benefits offered by Diana Group Hotels and its strategic marketing partners.

In some cases your permission will be implied from the nature of the service requested or transaction undertaken. For example, Diana Group Hotels may collect and use personally identifiable information that you volunteer, or behavioral data or information collected in the aggregate. In addition, your permission will be deemed given for communications from us that are necessary to fulfill transactions and services that you request.

In certain circumstances, we will seek your express permission when we collect information that is regarded under certain data privacy regulations to be sensitive in nature (e.g., information revealing racial or ethnic origin, political opinions, or health conditions).

ACCESS TO PERSONALLY IDENTIFIABLE INFORMATION:

To ensure that your personally identifiable information is accurate and up to date, we encourage you to regularly review and update your information as appropriate (e.g., in the event your home or e-mail address changes, or you wish to add an additional method for us to communicate with you). If you are a loyalty club member, you can review and update your individual membership profile on-line or with the assistance of a Diana Group Hotels customer service representative. If you are not a loyalty club member you can review and update your personally identifiable information by contacting our Customer Service representatives. Please note that in an effort to prevent the unauthorized disclosure of your personally identifiable information, you may be asked to provide proof of identity (or other authentication materials). Access to personally identifiable information from non - Loyalty Club members cannot be provided by telephone.

If, upon review, you wish to deactivate your Loyalty Club member profile, or update your personally identifiable information, we will endeavor to do so in a timely manner. Occasionally, information that you request to be removed will be retained in certain files for a period of time in order to properly resolve disputes or to troubleshoot problems. In addition, some types of information may be stored indefinitely on "back up" systems or within log files due to technical constraints, or financial or legal requirements. Therefore, you should not always expect that all of your personally identifiable information will be completely removed from our databases in response to your request.

SECURITY SAFEGUARDS:

Diana Group Hotels recognizes the importance of information security, and is constantly reviewing and enhancing our technical, physical, and logical security rules and procedures. Diana Group Hotels owned web site and servers have security measures in place to help protect your personally identifiable information against loss, misuse, and alteration while under our control. Although "guaranteed security" does not exist either on or off the Internet, we safeguard your information using both procedural and technical safeguards, including password controls, "firewalls" and the use of up to 128-bit encryption based on a Class 3 Digital Certificate issued by VeriSign, Inc. This allows for the use of Secure Sockets Layer (SSL), an encryption method used to help protect your data from interception and hacking while in transit.

ON-LINE TECHNOLOGIES:

Diana Group Hotels may use cookies, invisible pixels, and web beacons to obtain information about you while visiting our web sites. A cookie is a very small text file that is sent to your browser from a web server and stored on your computer's hard drive. It assigns the computer with a unique identifier, which in turn, becomes your identification card whenever you return to the Diana Group Hotels web site.

Cookies are designed to save you time because they help us to provide you with a customized experience without you having to remind us of your preferences each time you return to our web pages. Diana Group Hotels cookies are not designed to damage your files, nor can they read information from other files on your computer hard drive.

Cookies can also help us provide you with a personalized on-line experience in the following ways:

- they remember your user name and password for future visits so log-in is easier and faster
- they ensure you are provided with the appropriate frames and content
- they ensure you obtain all requested information
- they help us deliver communications that are relevant and responsive to your interests and location

Diana Group Hotels cookies are limited to our web sites only, and are not designed to follow you when traveling on the Internet after leaving our owned web site. We track the usage of our web site in order to better meet your needs and to help make it easier for you to find information in the future. Please note that in addition to our cookies, various third parties may also place cookies on your computer's hard drive. Diana Group Hotels are not responsible for the presence or absence of third party cookies, or for the technological capabilities or practices employed by third parties in connection with third party cookies.

If you would prefer not to have the benefits of cookies, your Internet browser can be adjusted to treat cookies in different ways. Depending on the type of browser you use, you may be able to configure your browser so that: (1) you are prompted to accept or reject cookies on an individual basis or (2) you may be able to prevent your browser from accepting any cookies at all. You should refer to the supplier or manufacturer of your web browser for specific details about cookie security. However, you should also understand that rejecting cookies might affect your ability to perform certain transactions on our web site and our ability to recognize your browser from one visit to the next.

Diana Group Hotels also uses invisible pixels, sometimes called web beacons, to count how many people visit certain web pages. Information collected from invisible pixels is used and

reported in the aggregate and does not contain personally identifiable information. Diana Group Hotels may use this information to improve marketing programs and content.

LINKS TO OTHER WEB SITES:

In order to anticipate your needs, Diana Group Hotels provide links to other web sites for your convenience and information. Diana Group Hotels is not responsible or liable for any content presented by or contained on any independent web site, including, but not limited to, any advertising claims or marketing practices. Please note that while Diana Group Hotels will protect your information on Diana Group Hotels owned and operated web site, we cannot control and will not be responsible for the privacy policies of third party web sites, including web sites owned or controlled by independent partners. Third party web sites that are accessed through links on our web sites have separate privacy and data collection practices, and security measures. We have no responsibility or liability for the practices, policies and security measures implemented by third parties on their web sites. We encourage you to contact them to ask questions about their privacy practices, policies and security measures before disclosing any personally identifiable information. We recommend that you review the privacy statements and policies of linked web sites to understand how those web sites collect, use and store information.

MINORS:

Diana Group Hotels does not seek to obtain nor does it wish to receive personally identifiable information directly from minors; however, we cannot always determine the age of persons who access and use our web sites. If a minor (as defined by applicable law) provides us with his/her data without parental or guardian consent, we encourage the parent or guardian to contact us to have this information removed and to unsubscribe the minor from future Diana Group Hotels marketing communications.