

# Hotel Data Privacy Policy – Harela Inn

The Guest(s), visiting and/or staying at the hotel, automatically agree to the hotel policies, terms and conditions mentioned below upon check in.

The same is also available at <a href="https://harelainn.com">https://harelainn.com</a>

# **Scope of This Policy**

This Privacy Policy describes how the Harela Inn Chamoli, India ("we" or "us") collects, uses, consults, or otherwise processes an individual's Personal Data. This Privacy Policy applies in All India but depending on where you live some specific provisions of this Privacy Policy may not apply to you.

In some of the situations described in this Privacy Policy, the hotel where you made a booking and/or stay will also process your data as a (joint or sole) Controller. The hotel will be solely responsible for the processing activities for which it is the sole Controller.

Harela Inn Chamoli India is a company incorporated under Indian laws, registered at the DIRECTORATE OF INDUSTRIES for MSME with UDYAM-UK-05-0007284 having its offices at H.No 124, Shivaji Nagar, Rishikesh, telephone number: +91-9258440449. For any privacy and/or data protection related questions, comments, or concerns, you may also send an e-mail to emailharela@gmail.com

We are committed to protecting the privacy of our users and customers.

This Privacy Policy is intended to inform you how we gather, define, and use Personal Data that you provide to us when using our websites and mobile applications or when relying on our hospitality services. Please take a moment to read this Privacy Policy carefully. Please note that if you plan to submit someone else's Personal Data to us, for instance when making a booking on their behalf, you may only provide us with that person's details with their consent and after they have been given access to information about how we will use their details, including the purposes set out in this Privacy Policy.

THIS POLICY INCLUDES A DESCRIPTION OF YOUR DATA PROTECTION RIGHTS, INCLUDING A RIGHT TO OBJECT TO SOME OF THE PROCESSING ACTIVITIES WE CARRY OUT. PLEASE NOTE THAT YOUR RIGHTS AS A DATA SUBJECT MAY VARY DEPENDING UPON WHERE YOU LIVE.



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# **Hotel Booking Process**

# 1. Hotel booking process

In the context of the hotel booking process – whether this takes place online on our websites (https://www.harelainn.com), through an online booking channel, via a travel agent, through our call center or directly at the hotel – we process your Personal Data for the purpose of (i) enabling you to reserve a room in the hotel of your choice; (ii) verifying the availability of the hotel and to administer the booking; (iii) sending you a booking confirmation; and (iv) sending you pre-arrival emails. You may unsubscribe from pre-arrival emails at any time by clicking on the unsubscribe link in the emails sent to you.

# **Processed data categories**

Address, Booking details (including reservation number), Date of arrival and departure, Email address, First name / Last name, First name / Last name of adult co-guest(s), Payment card type, number and expiration date, Harela Inn Rewards membership number, Telephone number, Title

#### Source of data

Depending on the booking mechanism used:

- Directly from you through the online booking form
- Through the online booking channel you used to make the booking
- From your travel agent
- From our call center
- From the Harela Inn hotel you made a direct booking with

#### Ground for processing

Processing is necessary to take steps to enter into and perform a contract.

- The Harela Inn
- Other Harela Inn Group entities involved
- IT service providers involved in the (online) booking process
- IT service providers
- Email communications service provider



# 2. Interrupted or incomplete online booking process (abandoned cart)

When you are booking online but for some reason are not able to finalize the booking process, we process your Personal Data for the purpose of enabling you to easily continue the online booking process by sending you an email with a link to the online booking form, which is pre-filled on the basis of the data you had already provided in the form.

## **Processed data categories**

Address, Date of arrival and departure, Email address, First name / Last name, First name / Last name of adult co-guest(s), Payment card type, number and expiration date, Harela Inn Rewards membership number, Telephone number, Title

#### Source of data

Directly from you through the online booking form

## **Ground for processing**

It is in Harela Inn 's legitimate interest as a business to re-market an interrupted or incomplete booking process. In this context, Harela Inn 's business interests prevail over yours.

## Recipients of data

- Email communications service provider
- Provider of targeted advertisements

# 3. Guest satisfaction surveys

We may send you guest satisfaction surveys by email during or after your stay to enable us to measure the performance of our hotels. You may unsubscribe from our guest satisfaction survey emails at any time by clicking on the unsubscribe link in the emails sent to you.

#### **Processed data categories**

Country of residence, Date of arrival and departure, Email address, First name / Last name, Nationality, Harela Inn Rewards membership number, Stay details

#### Source of data

Depending on the booking mechanism used:

- Directly from you through the booking form
- Through the online booking channel you used to make the booking
- From your travel agent
- From our call center
- From the Harela Inn hotel you made a direct booking with



# **Ground for processing**

Processing is necessary to ensure and follow up on the good performance of the contract you have with us.

## Recipients of data

- Other Harela Inn entities involved
- Guest satisfaction survey provider

# 4. Service emails Analytics

In the context of service emails, which includes guest satisfaction survey emails and any pre-arrival emails concerning your booking, we may process and collect your Personal Data, and notably whether you have opened and actioned a service email, for analytical purposes in order to measure the click-through rate and improve the content of our service emails. You may unsubscribe from our service emails at any time by clicking on the unsubscribe link in the service emails sent to you.

The information below describes the types of data we process for this purpose, where we get your data from, the ground we rely on to carry out the processing, and who we may share your data with.

#### **Processed data categories**

Email address, Email clicking behavior, Email opening behavior, First name / Last name, Harela Inn Rewards membership number

#### Source of data

From our email analytics service provider

#### **Ground for processing**

It is in Harela Inn Hotel legitimate interest as a business to understand the email clicking behavior of its guests in order to determine whether improvements are needed. In this context, Harela Inn Hotel business interests prevail over yours.

- Other Harela Inn Hotel entities involved
- IT service providers
- Email analytics service provider



# **Hotel Guests**

#### 1. Hotel check-in and check-out

When staying at the hotel, we will collect and process your Personal Data for the purposes of (i) registering your arrival and departure at the hotel; (ii) assigning you a key card or key to your room (iii) obtaining a credit card guarantee or hotel deposit to ensure payment of your stay; (iv) managing (and archiving) your hotel registration card; (v) creating or updating your profile in our hotel management system; (vi) assessing your eligibility for a room upgrade and managing this if applicable; (vii) managing payment of your stay; (viii) establishing, printing or sending an invoice for your stay; and (ix) paying a commission to your travel agent (if applicable).

In the event you have booked a room in one of our hotels but do not show up — without canceling — on the date of arrival communicated, we will process your Personal Data for the purposes of (i) canceling your stay and any other reservation you may have made; and (ii) managing, processing and settling any outstanding payment that may be due.

# **Processed data categories**

Address, Bookings (hotel, restaurant, event, theater, etc.), Date of arrival and departure, Email address, First name / Last name, First name / Last name of adult co-guest(s), Payment card type, number and expiration date, Harela Inn Rewards membership number, Telephone number, Title

#### Source of data

Depending on the booking mechanism used:

- Directly from you through the booking form
- Through the online booking channel you used to make the booking
- From your travel agent
- From our call center
- From the Harela Inn hotel you made a direct booking with
- Directly from you through the hotel registration card

#### **Ground for processing**

Processing is necessary to perform the contract you have with us.

- Other Harela Inn entities involved
- IT service providers
- Your travel agent (if applicable)



# 2. Credit limit reports

To ensure payment for all guests staying in a hotel room, each hotel guest is asked for a credit card or deposit upon arrival. In order to ensure that you do not exceed your credit limit during your stay, we produce a credit limit report multiple times a day for the purposes of verifying whether your credit limit has been exceeded. These credit limit reports may contain your Personal Data. Please note that in limited circumstances these credit limit reports may be subject to one of our internal financial audits, and may therefore be accessed by members of our internal audit department, in order to ensure that our hotels follow the Harela Inn internal guidelines and policies.

## **Processed data categories**

Date of arrival and departure, First name / Last name, Payment card type, number and expiration date

#### Source of data

Depending on the booking mechanism used:

- Directly from you through the booking form
- Through the online booking channel you used to make the booking
- From your travel agent
- From our call center
- From the Harela Inn hotel you made a direct booking with
- Directly from you through the hotel registration card

## **Ground for processing**

Processing is necessary to ensure the performance of the contract you have with us.

## **Recipients of data**

- Other Harela Inn entities involved
- IT service providers

# 3. Hotel stay

When you stay in our hotel, we endeavor to make your stay as pleasant as possible. This requires processing your Personal Data for the purposes of providing specific services during your hotel stay. These services include (i) housekeeping and maintenance; (ii) returning lost or forgotten items to you; and/or (iii) managing your and your co-guests preferences, such as dietary requirements and pillow preferences, in order to provide you with a better service during your stay with us.

#### **Processed data categories**

Address, Consumption habits, Date of arrival and departure, Dietary requirements, Email address, First name / Last name, First name / Last name of adult co-guest(s),



Other preferences, Payment details (for the purpose of returning lost or forgotten items), Telephone number

#### Source of data

Depending on the booking mechanism used:

- Directly from you through the booking form
- Through the online booking channel you used to make the booking
- From your travel agent
- From our call center
- From the Harela Inn hotel you made a direct booking with
- Directly from you during your stay at the hotel

## **Ground for processing**

It is in Harela Inn legitimate interest as a business to organize its day-to-day hotel maintenance activities, to personalize the services it provides, and/or to be able to identify the owner of a lost or forgotten item. Taking into account the limited Personal Data processed and shared for such purpose(s), Harela Inn business interests prevail over yours.

## Recipients of data

- Hotel personnel, including housekeeping, maintenance, front desk, and/or other hotel personnel concerned
- Other Harela Inn entities involved
- IT service providers
- Delivery or courier service providers (for the purpose of returning lost or forgotten items)

# 4. Hotel guests additional services and facilities

In our hotel, you can benefit from additional services and facilities, such as breakfast, room service, minibar, restaurants, laundry services, parking, taxi requests, free Wi-Fi, etc. In the event you make use of additional services or facilities at our hotel, your Personal Data may be processed to (i) manage the booking and use of such additional hotel services and/or facilities; (ii) administer any advance bookings of additional services and/or facilities to your file; (iii) personalize returning guests' arrival to the hotel and the choice of room amenities and room features; and (iv) manage the expenses incurred for such additional services and/or facilities.

#### **Processed data categories**

Consumption habits, Date of arrival and departure, Dietary requirements, Email address, First name / Last name / Last name of adult co-guest(s), Payment card type, number and expiration date, Harela Inn Rewards membership number, Title

#### Source of data



- Directly from you through the online booking form
- Through the online booking channel you used to make the booking
- From your travel agent
- From our call center
- Directly from you through the hotel registration card
- Directly from you when making your additional service/facility request with the hotel front desk or the concierge
- Through the online booking platform for additional services and facilities

## **Ground for processing**

Processing is necessary to take steps with a view to entering into a contract and/or to perform the contract.

# Recipients of data

- Hotel personnel, including front desk, room service, and/or other hotel personnel concerned
- Other Harela Inn entities involved
- IT service providers

# **Loyalty Programs**

## 1. Harela Inn Rewards

Harela Inn Rewards is a global hotel rewards program applicable throughout the partner hotels of the Harela Inn that is available to guests staying in our hotels, and to professional partners irrespective of whether the professional partners stay as guests or book on behalf of others. The Harela Inn Rewards program is managed by Harela Inn Chamoli India. The Harela Inn Rewards program provides you with a number of benefits during your stay at our hotel and enables you to collect Harela Inn Rewards points during your stay in our hotels and when purchasing from our selected partners. In such context, we may process your Personal Data in order to be able to i) create your online Harela Inn Rewards profile, including sending you an activation link by email; ii) provide you with information on your Harela Inn Rewards points; iii) register your bookings and award points to your membership card; iv) inform you about your rewards once you reach a certain points level; and v) inform you about any changes to the Harela Inn Rewards program.

#### Processed data categories

First name / Last name, e-mail address, postal address, Hotel stay details, Membership number of loyalty program of relevant partner company, IATA and company name in the case of travel agent members

#### Source of data

Directly from you when claiming or redeeming miles or points



# **Ground for processing**

Processing is necessary to take steps at your request with a view to perform the contract you have with us as well as to perform the contract you have with our recognized partner(s).

# Recipients of data

- Other Harela Inn entities involved
- IT service providers
- Relevant partner company

# 2. Other Loyalty Program

Apart from Harela Inn Rewards, we also offer our guests the possibility to earn miles or points in loyalty programs of our partners, such as frequent flyer programs, car rental programs and railway programs. In such context, we may process your Personal Data in order to be able to (i) award miles or points to your membership account with one of our recognized partners following your stay at our hotel; and (ii) assess and fulfil your request to redeem your miles or points of our recognized partners' loyalty programs at our hotel.

## **Processed data categories**

First name / Last name, e-mail address, country code, Hotel stay details, Membership number of loyalty program of relevant partner company

#### Source of data

Directly from you when claiming or redeeming miles or points

#### **Ground for processing**

Processing is necessary to take steps at your request with a view to perform the contract you have with us as well as to perform the contract you have with our recognized partner(s).

# Recipients of data

- Other Harela Inn entities involved
- IT service providers
- Relevant partner company

# 3. Redemption

We provide you with the opportunity to redeem your loyalty points for items such as Harela products, partner offers or charities. When you make a redemption, we process your and, if applicable, the Harela products recipient's Personal Data for the purpose of managing and successfully completing your redemption. In cases where you purchase Harela products for another person, we will process additional



Personal Data for the purpose of delivering the Harela products to the recipient by email or by post.

## **Processed data categories**

First name / Last name, Payment card type, number and expiration date, your Address, Telephone number, Connection logs, email address, and IP address. If you purchase Harela products for someone else and depending on the mode of delivery, we will also process the Address of the recipient, email address of the recipient, First name / Last name of the recipient, and Telephone number of the recipient.

#### Source of data

Directly from you when redeeming your points at the hotel or online

## **Ground for processing**

Processing is necessary for the performance of the contract you have with us.

## Recipients of data

- Other Harela Inn entities involved
- IT service providers
- Harela products platform provider
- Payment service provider
- IT service providers involved in the (online) booking process

# Harela products

We provide the opportunity to purchase physical or e-Harela products that can be purchased at our hotels.

# 1. Purchasing a Harela products

When you purchase Harela products at one of our hotels or online, we process your and, if applicable, the Harela products recipient's Personal Data for the purposes of managing and successfully completing your purchase of the Harela products. If you are purchasing the Harela products for another person, we will process additional Personal Data for the purpose of delivering the Harela products to the recipient by email or by post.

## **Processed data categories**

- First name / Last name, Payment card type, number, and expiration date
- If a Harela product is purchased online, in addition to the above, we will process your Address, Connection logs, Email address, and IP address
- If you purchase the Harela products for someone else and depending on the mode of delivery, we will also process the Address of the recipient, Email address of the recipient, First name / Last name of the recipient, Telephone number of the recipient



#### Source of data

Directly from you when purchasing the Harela products at the hotel or online

## **Ground for processing**

Processing is necessary to take steps at your request with a view to entering into and performing a contract.

# Recipients of data

- Other Harela Inn entities involved
- IT service providers
- Harela products platform provider
- Harela products manufacturer
- Payment service provider

# Subscription to Our Newsletters

# 1. Newsletters and marketing communications

If you have explicitly consented to receive our newsletters or marketing communications, including in relation to Harela Inn Rewards, we may, from time to time, contact you with information about our services and latest offers and process your Personal Data for this purpose.

If you no longer want to receive our newsletters or marketing communications, please let us know by sending us an email at <a href="mailto:ema

## **Processed data categories**

- Address, Date of birth, Email address, First name / Last name, Gender, Hobbies and interests, Telephone number, Hotel stay history, Country of residence

#### Source of data

- Directly from you when subscribing to our newsletter or later when completing your account

#### Ground for processing

- Ad hoc consent was obtained during the subscription to our newsletter

- Other Harela Inn entities involved
- IT service providers
- Email communications service provider



# 2. Newsletters and marketing communications analytics

In the context of our newsletters and marketing communications, we may also process and collect your Personal Data, and notably whether you have opened and interacted with one of our communications, for analytical purposes in order to measure the click-through rate and improve the content of our newsletters and marketing communications.

## **Processed data categories**

- Email address, Email clicking behavior, Email opening behavior, First name / Last name, Harela Inn Rewards membership number

#### Source of Data

- From our email analytics service provider

#### **Grounds for Processing**

- It is in Harela Inn's legitimate interest as a business to understand the click-through rate of its emails in order to determine whether improvements are needed. In this context, Harela Inn's business interests prevail over yours.

## **Recipients of Data**

- Other Harela Inn entities involved
- IT service providers
- Email analytics service provider

# **Mobile Applications**

In order to assist our guests in booking, planning, and enjoying their stay, we offer mobile applications for our hotel but are not limited to Harela Inn. These mobile apps can be downloaded through online app stores, including the Apple App Store or the Google Play store.

Depending on how you use our mobile applications, your Personal Data may be processed for the purposes of (i) enabling you to reserve a room in the hotel of your choice (see also Hotel Booking Process); (ii) processing your online check-in; (iii) managing your room service order; (iv) booking reservations at your request at a local restaurant; (v) performing special services at your request such as wake up calls, late check-out, or turn down service; (vi) enabling you to book meetings and events in our hotels; (vii) processing your online check-out and your feedback on your stay; (viii) addressing the requests you have made through the mobile app, including through the chat; and (ix) view how many loyalty points you have collected. To avoid having us receive or use your real-time location, do not opt in to location services. If you did opt in and have changed your mind, you may opt out of location services through your device settings or by deleting the application. Equally, if you



would like to no longer receive push notifications via one of our mobile applications, you can revoke push notification permission for the mobile application(s) in your device's operating system settings.

The information below describes the types of data we process in the context of our mobile applications, where we get your data from, the ground we rely on to carry out the processing, and who we may share your data with. For the Harela Inn Rewards mobile application, please consult the dedicated section on Harela Inn Rewards.

# **Processed data categories**

- Email address, First name / Last name, Location data, Stay details, Telephone number

#### Source of data

- Directly from you when downloading our application(s) or when interacting with the application(s)

#### Ground for processing

- Ad hoc consent obtained during the installation of the application or in the context of your use of the application

## Recipients of data

- The Harela Inn hotel of your choice
- Other Harela Inn entities involved
- Mobile applications provider
- Cloud and hosting service providers

# Meetings and Events

# 1. Meetings and events organization and feedback

If you wish to organize a meeting or event in Harela Inn or one of our partner hotels or if you would like more information on this possibility, you can reach out to us by filling in the Request a Proposal form or dedicated contact form on our website(s), by interacting with the online meetings and events chatbot, by directly contacting the hotel of your choice or by contacting us by other means. The Personal Data collected will be processed for the purposes of fulfilling your request to organize a meeting or event.

We may also send you meeting satisfaction surveys after your meeting or event to enable us to measure the performance of our hotels as meeting venues.

#### **Processed data categories**

- Address, Date of meeting or event, Email address, First name / Last name, Profession and employment, Harela Inn Rewards membership number, Telephone number



#### Source of data

Directly from you through:

- the online Request a Proposal form
- the online contact form
- the meetings and events chatbot
- a request communicated by other means

## **Ground for processing**

Depending on whether you contract directly with us or on behalf of your company:

- Processing is necessary to take steps at your request with a view to entering into and to perform a contract
- It is in Harela Inn 's legitimate interest as a business to have a lead contact person at the company organizing a meeting or event and providing feedback on that meeting or event. In this context, Harela Inn 's business interests prevail over yours.

## Recipients of data

- The hotel of your choice
- Other Harela Inn entities involved
- IT service providers
- Online chatbot service provider
- Meeting satisfaction survey provider

# 2. Meetings and events marketing communications

If you have opted in to receive commercial communications in the context of the organization of a meeting or event, we will also process your data to contact you with information about our services and latest offers.

#### **Processed data categories**

- Address, Email address, First name / Last name, Profession and employment, Telephone number

#### Source of data

Directly from you through:

- the online Request a Proposal form
- the online contact form
- the meetings and events chatbot
- a request communicated by other means

# **Ground for processing**

Ad hoc consent obtained through:



- the Request a Proposal form online
- the contact form
- the meetings and events chatbot

## Recipients of data

- Other Harela Inn entities involved
- IT service providers
- Online chatbot service provider
- Email communications service provider

# 3. Meetings and events marketing communications analytics

In the context of our marketing communications concerning meetings and events, we may also process and collect your Personal Data, and notably, whether you have opened and interacted with one of our communications, for analytical purposes in order to measure the click-through rate and improve the content of our marketing communications.

## **Processed data categories**

- Email address, Email clicking behavior, Email opening behavior, First name / Last name, Profession and employment, Harela Inn Rewards membership number

#### Source of data

- From our email analytics service provider

#### Ground for processing

- It is in Harela Inn 's legitimate interest as a business to understand the click-through rate of its emails in order to determine whether improvements are needed. In this context, Harela Inn 's business interests prevail over yours.

## Recipients of data

- Other Harela Inn entities involved
- IT service providers
- Email analytics service provider

# **Analytics**

We may use any data you provide to us for analytical purposes to optimize your experience, enhance our marketing, business and operational efficiency, create segments of our customers based on their Personal Data and tailor our offers and promotions to your preferences and consumption habits. In the context of such analytics, we analyze and may combine different data we hold about our guests, including (i) responses to guest satisfaction surveys; (ii) communications guests have with us; (iii) click-through rates for our marketing communications; (iv) our guests' behavior on our websites; (v) bookings; and (vi) any information we receive



via our Harela Inn Rewards program. Please see also our dedicated sections on Meeting and Events Marketing Communications Analytics and Newsletter and Marketing Communications Analytics.

## **Processed data categories**

- Hotel stay details, Address, Bookings (hotel, restaurant, event, theatre, etc.), Date of arrival and departure, Title, First name / Last name, First name / Last name of adult co-guest(s), Email address, Telephone number, Payment card type, number and expiration date, Harela Inn Rewards membership number, redemption history

#### **Source of Data**

- Directly from you when signing up to Harela Inn Rewards or claiming or redeeming Harela Inn Rewards points
- Directly from you through the online booking form
- Through the online booking channel you used to make the booking
- From your travel agent
- From our call center
- From our email analytics provider
- Directly from you when making your additional service/facility request with the hotel front desk or the concierge

# **Ground for processing**

- It is in Harela Inn 's legitimate interest as a business to understand its guests' preferences and consumption habits. In this context, Harela Inn 's business interests prevail over yours.

## Recipients of data

- Other Harela Inn entities involved
- IT service providers
- Analytics service provider
- Providers of targeted advertisements

## Social Media and Online Reviews

We may process your Personal Data obtained through social media platforms (including Facebook, Instagram, LinkedIn, Weibo and Twitter) or online reviews (including on TripAdvisor) concerning our Harela Inn Hospitality brands for the purposes of (i) addressing your questions or complaints; (ii) monitoring our online reputation; and (iii) improving our services and identifying opportunities on which we can focus.

Some of our social media pages allow users to submit their own content. Please remember that any content submitted to one of our social media pages can be viewed by the public, and you should be cautious about providing certain personal information (e.g., financial information or address details) via these platforms. We are not responsible for any actions taken by other individuals if you post personal



information on one of our social media platforms (e.g., Facebook or Instagram). Please also refer to the respective privacy and cookie policies of the social media platforms you are using.

# **Processed data categories**

- Any Personal Data you may decide to share with us or published on social media or in other online reviews about us

#### **Source of Data**

- Directly from you through publicly accessible social media pages, online booking channels or other (review) websites
- From our online reputation monitoring service provider

## **Ground for processing**

It is in Harela Inn 's legitimate interest as a business to process the Personal Data you have chosen to address to us or make publicly available on social media platforms, online booking channels or other (review) websites in order to improve our services and identify business opportunities. In this context, Harela Inn 's business interests prevail over yours..

## Recipients of data

- Other Harela Inn entities involved
- Online reputation monitoring service provider

#### Social media contests

From time to time, we may organize a contest on one of our social media pages. If you choose to participate in such a contest, we will process your Personal Data for the purpose of organizing and managing the social media contest and picking the winner(s).

#### **Processed data categories**

- This depends on the data fields in the contest concerned, but almost always includes the following categories of data:

Address, Email address, First name / Last name, Telephone number

#### Source of Data

- Directly from you through our social media pages

#### **Ground for processing**

- Processing is necessary to take steps to enter into and perform a contract as you accept the terms and conditions of the contest.



- Other Harela Inn entities involved
- IT service provider

# Right to withdraw consent

Wherever we rely on your consent, you will be able to withdraw that consent at any time you choose and at your own initiative by logging in to your account on our website (if you have one) or by contacting us <a href="mailto:email

# Right to access and rectify your data

You have the right to access, review, and rectify your Personal Data. You may be entitled to ask us for a copy of your information, to review or correct it if you wish to rectify any information like your name, email address, passwords and/or any other preferences, you can easily do so by logging in to your account on our website (if you have one) or by contacting us at <a href="mailharela@gmail.com">emailharela@gmail.com</a>. You may also request a copy of the Personal Data processed as described in this Privacy Policy.

# Right to erasure

In accordance with EU Privacy Law, you have the right to the erasure of your Personal Data processed by us as described in this Privacy Policy in case it is no longer needed for the purposes for which the Personal Data was initially collected or processed or in the event you have withdrawn your consent or objected to processing as described in this Privacy Policy and no other legal ground for processing applies. Should you wish to have your Personal Data erased, please file a request via email at <a href="mailto:emailto:

## Right to restriction of processing

Under certain circumstances described in any data privacy law (applied in India), you may ask us to restrict the processing of your Personal Data. This is for example the case when you contest the accuracy of your Personal Data. In such event, we will restrict the processing until we can verify the accuracy of your data.

## Right to data portability

Where you have provided your data directly to us and where the processing is carried out by automated means and based on your consent or the performance of a contract between you and us, you have the right to receive the Personal Data



processed about you in a structured, commonly used and machine-readable format, and to transmit this data to another service provider.

# What Rules Apply to Children?

We do not knowingly collect or solicit Personal Data from anyone under the age of 18 or knowingly allow such persons to book a room in one of our hotels. In the event we learn that we have collected Personal Data from a child under the age of 18 without verification of parental consent, steps will be taken promptly to remove that information. If you believe that we have or may have information from or about a child under 18 years of age, please contact us at emailharela@gmail.com.

# How Is Your Personal Data Shared with Third Parties?

We only share or disclose information as described herein, including with Third Parties.

Your Personal Data will also be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of the Controller(s) legitimate interests in compliance with applicable laws. In addition, we may share your Personal Data and other information with a successor to all or part of our business, where this is in our legitimate interests in facilitating a business sale and in this context our business interests prevail over yours. For example, if parts of our business or assets are sold, we may disclose user information as part of that transaction, subject to applicable law.

# How Long Will We Keep Your Personal Data?

We retain your Personal Data for as long as is required to fulfil the activities set out in this Privacy Policy, for as long as otherwise communicated to you or for as long as is permitted by applicable law. For example, we may retain your Personal Data if it is reasonably necessary to comply with any legal obligations, meet any regulatory requirements, resolve any disputes or litigation, or as otherwise needed to enforce this Privacy Policy and prevent fraud and abuse.

To determine the appropriate retention period for the information we collect from you, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of the data, the purposes for which we process the Personal Data, and whether we can achieve those purposes through other means, and the applicable legal requirements.



# Does This Privacy Policy Apply to Third Party Websites?

If you click on a link to a Third Party website, you will be taken to a website we do not control and our Privacy Policy will no longer be in effect. Your browsing and interaction on any other website is subject to the terms of use and privacy and other policies of such Third Party website. Read the privacy policies of other websites carefully. We are not responsible or liable for the information or content on such Third-Party websites.

# What Happens If We make modifications to This Policy?

We reserve the right to modify and update this Privacy Policy from time to time. We will bring these changes to your attention should they be indicative of a fundamental change to the processing or be relevant to the nature of the processing or be relevant to you and impact your data protection rights.

# How to Contact Us

Questions, comments, remarks, requests or complaints regarding this Privacy Policy are welcome and should be addressed to <a href="mailto:emai

You can also write us at:

**Managing Director** 

Harela Inn Kshetrapal, Bhimtala, Chamoli - 246424

Uttarakhand, India