# **Data protection**

# Registration page Courtyard by Marriott Yerevan event 2024

We, Courtyard by Marriott Yerevan (hereinafter "we" or "Courtyard by Marriott Yerevan"), are pleased about your interest in our online offering www.marriott-yerevan-opening.com (hereinafter the "online offering"). We take the protection of your personal data very seriously. Your personal data is processed exclusively within the framework of the statutory provisions of data protection law, in particular the General Data Protection Regulation (hereinafter "GDPR"). With this data protection declaration we inform you about the processing of your personal data and about your rights as a data subject within the framework of the online offering. Information on the processing of personal data in other areas can be found in the respective specific data protection declaration. If we refer to this data protection declaration from external social media profiles, the following explanations only apply to the extent that the processing takes place within our area of responsibility and to the extent that no more specific and therefore priority information on data protection is provided within the framework of such social media profiles.

### 1. Person responsible and data protection officer

Responsible for data processing within the meaning of data protection laws is: Courtyard by Marriott Yerevan

5 Teryan St Yerevan Armenia

Phone: +374 60 656560

Email: courtyard.yerevan@marriott.com

# 2. Subject of data protection

The subject of data protection is the protection of personal data. This is all information that relates to an identified or identifiable natural person (so-called data subject). This includes details such as name, postal address, e-mail address or telephone number, but also other information that arises when using the online service, in particular information about the start, end and extent of use and the transmission of your IP address.

#### 3. Purposes and legal bases of data processing

Below you will find an overview of the purposes and legal bases of data processing as part of the online service. In any case, we process personal data in accordance with the legal requirements, even if a different legal basis should be applicable in individual cases than stated below.

The provision of personal data by you may be required by law or contract or necessary for

the conclusion of a contract. We will inform you separately if you are obliged to provide personal data and what possible consequences non-provision would then have (e.g. a loss of claims or our notice that we will not provide the requested service without providing certain information). The use of the online offering is generally possible without registration. The use of individual services and functions may require prior registration. Even if you use our online offering without registration, personal data may still be processed.

### 3.1 Provision of a registration function

We process your personal data if this is necessary for the execution of a contract to which you are a party or for the implementation of pre-contractual measures that are carried out at your request. The data processing is carried out on the basis of Article 6 paragraph 1 letter b) GDPR. The purposes of the processing include enabling the use of our specific products and services as part of the online offering. Please also note the descriptions of these products and services as part of the online offering.

The online offer therefore offers the possibility of using a registration function. Mandatory information required for registration is marked with an "\*" in the respective input field. Please note that further information is not required for registration and you alone decide whether you wish to provide us with this data. If you do not provide this data, we may not be able to fully comply with your wishes. The data you provide will be used by us to carry out the registration as explained in more detail in the online offer.

#### 3.2 Fulfillment of legal obligations

We process your personal data in order to comply with legal obligations to which we are subject. Data processing is carried out on the basis of Article 6 Paragraph 1 Letter c) GDPR. The obligations can arise, for example, from commercial, tax, money laundering, financial or criminal law. The purposes of the processing arise from the respective legal obligation; the processing generally serves the purpose of complying with state control and information obligations.

#### 3.3 Protection of legitimate interests

We also process your personal data to protect the legitimate interests of us or third parties, unless your interests, which require the protection of your personal data, prevail. The data processing is carried out on the basis of Article 6 paragraph 1 letter f) GDPR. The processing to protect legitimate interests is carried out for the following purposes or to protect the following interests.

- Processing of non-contractual enquiries and requests;
- Ensuring legal compliance, prevention of and protection against legal violations (in particular criminal offenses), assertion of and defense against legal claims, internal and external compliance measures;

- Ensuring availability, operation and security of technical systems as well as technical data management;
- Answering and evaluating contact requests and feedback.

When you access the online service, data relating to your device and your use of the online service is processed and saved in a so-called log file. This particularly applies to technical data such as the date and time of access, duration of the visit, type of device, operating system used, functions used, amount of data sent, IP address and referrer URL. We process this data to ensure technical operation and to identify and eliminate faults. Our interest in doing so is to ensure technical functionality on a permanent basis. We do not use this data for the purpose of drawing conclusions about you.

#### 3.4 Consent

We process your personal data on the basis of your consent. Data processing is carried out on the basis of Article 6 paragraph 1 letter a) GDPR. If you give consent, it is always earmarked for a specific purpose; the purposes of the processing arise from the content of your declaration of consent. You can revoke your consent at any time without this affecting the legality of the processing carried out on the basis of the consent until the revocation.

#### 3.5 Change of purpose

If we process your personal data for a purpose other than that for which the data was collected beyond a corresponding consent or a mandatory legal basis, we take into account the compatibility of the original and the now pursued purpose, the type of personal data, the possible consequences of further processing for you and the guarantees for the protection of personal data in accordance with Article 6 Paragraph 4 GDPR.

#### 3.6 Profiling

We do not carry out automated decision-making or profiling in accordance with Article 22 GDPR. Profiles are only created to protect our legitimate interests as described above.

#### 4. Access authorizations in the end device

If functions of our online offering require the granting of authorizations to access your end device (e.g. access to location data or photos), the granting of the authorizations is voluntary. However, if you want to use the corresponding functions, the granting of the corresponding authorizations is necessary, otherwise you will not be able to use these functions. The authorizations remain active as long as you have not reset them in your end device by deactivating the respective setting.

#### 5. Cookies and similar technologies

As part of our online offering, we use cookies and similar technologies that are used to communicate with your device and exchange stored information (hereinafter collectively

referred to as "cookies"). These cookies primarily serve to make the functions of the online offering usable. General examples in which the use of cookies in this sense is technically necessary are the storage of a language selection, login data or a shopping or wish list. Accordingly, we can use technically necessary cookies to enable the processing described in section 3.1 and to ensure the proper and secure operation of the online offering. The data processing is then carried out on the basis of Article 6 paragraph 1 letters b) and f) GDPR, as it is necessary to implement the functions you have selected or to protect our legitimate interest in the functionality of the online offering.

If we should also use cookies to analyze the use of the online offering and to be able to target it to your interests and, if necessary, to be able to provide you with interest-based content and advertisements, this will only be done on the basis of your voluntary consent in accordance with Article 6 Paragraph 1 Letter a) of the GDPR. You then have the option of making your corresponding settings via the consent management within the online offering. You can revoke any consent given here at any time with effect for the future. Further information on cookies and their function in detail as well as on setting and revocation options can be found directly in the relevant areas of consent management. Please note that we generally only make consent management available within the online offering if consent-based cookies are to be used in addition to the technically necessary cookies mentioned above.

If you do not wish cookies to be used at all, you can also prevent them from being stored by making the appropriate settings on your device. You can delete stored cookies at any time in the system settings of your device. Please note that blocking certain types of cookies may impair the use of our online services.

### 6. Integrated third-party services

If we integrate services from other providers as part of our online offering in order to offer you certain content or functions (e.g. playing videos or route planning) and we process personal data in the process, this is done on the basis of Article 6 Paragraph 1 Letters b) and f) of the GDPR. This is because the data processing is then necessary in order to implement the functions you have selected or to protect our legitimate interest in an optimal range of functions of the online offering. If cookies may be used as part of these third-party services, the statements under Section 5 apply. Please also read the data protection declaration of the respective provider with regard to the third-party services.

Services from other providers that we integrate or to which we refer are provided by the relevant third parties. We have no influence on the content and function of the third-party services and are generally not responsible for the processing of your personal data by their providers unless the third-party services are completely designed on our behalf and then integrated by us under our own responsibility. If the integration of a third-party service results in us establishing joint processes with its provider, we will enter into an agreement with this provider on joint responsibility in accordance with Article 26 of the GDPR, which will determine the respective tasks and responsibilities for processing personal data and who will fulfil which data protection obligations. If cookies are also to be set on the basis of

your consent, you will receive further information on the responsibility for setting these cookies or any associated third-party services in the corresponding area of consent management.

Unless otherwise stated, profiles on social media are generally only integrated into our online offering as a link to the corresponding third-party services. After clicking on the integrated text/image link, you will be redirected to the offer of the respective social media provider. After redirection, personal data may be collected directly by the third-party provider. If you are logged into your user account with the respective social media provider during this time, the provider may be able to assign the information collected from the specific visit to your personal user account. If you interact via a "Share" button on the respective social media provider, this information may be saved in the personal user account and published if necessary. If you wish to prevent the information collected from being directly assigned to your user account, you must log out before clicking on the integrated text/image link.

#### 7. Recipients of personal data

Within our company, only those people who need your personal data for the purposes stated in each case have access to it. We only pass on your personal data to external recipients if we have legal permission to do so or if we have your consent. Below you will find an overview of the relevant recipients:

- Processors: Group companies or external service providers, for example in the areas of technical infrastructure and maintenance, who are carefully selected and checked. The processors may only use the data in accordance with our instructions.
- Public bodies: Authorities and state institutions, such as tax authorities, public prosecutors or courts, to which we (must) transmit personal data, for example to fulfil legal obligations or to protect legitimate interests.
- Private entities: Group companies and service companies, cooperation partners, (non-binding) service providers or commissioned persons such as transport service providers.

#### 8. Data processing in third countries

If data is transferred to bodies whose headquarters or place of data processing is not in a member state of the European Union, another contracting state to the Agreement on the European Economic Area or a state for which an adequate level of data protection has been determined by a decision of the European Commission, we will ensure before the data is transferred that the data transfer is either covered by a statutory authorization, that guarantees for an adequate level of data protection with regard to the data transfer exist (e.g. through the agreement of contractual guarantees, officially recognized regulations or binding internal data protection regulations at the recipient) or that you have given your consent to the data transfer.

If the data transfer takes place on the basis of Article 46, 47 or 49 Paragraph 1

Subparagraph 2 GDPR, you can obtain a copy of the guarantees for the existence of an adequate level of data protection with regard to the data transfer or an indication of the availability of a copy of the guarantees. Please use the information under section 1 for this purpose.

## 9. Storage period, deletion

If there is legal permission to do so, we will only store your personal data for as long as is necessary to achieve the purposes pursued or as long as you have not revoked your consent. In the event of an objection to processing, we will delete your personal data unless further processing is still permitted under the statutory provisions. We will also delete your personal data if we are obliged to do so for other legal reasons. In accordance with these general principles, we will usually delete your personal data immediately.

- after the legal basis no longer applies and provided that no other legal basis (e.g. retention periods under commercial and tax law) applies. If the latter applies, we will delete the data after the other legal basis no longer applies;
- if your personal data is no longer required for the purposes we pursue and there is no other legal basis (e.g. retention periods under commercial and tax law). If the latter applies, we will delete the data once the other legal basis no longer applies.

#### 10. Rights of the data subject Right

**to information**: You have the right to receive information about the data we have stored about you.

**Right to rectification and erasure**: You can request that we correct incorrect data and - if the legal requirements are met - delete your data.

**Restriction of processing**: You can request that we restrict the processing of your data - if the legal requirements are met.

**Data portability**: If you have provided us with data on the basis of a contract or consent, you can request, if the legal requirements are met, that you receive the data you have provided in a structured, common and machine-readable format or that we transmit it to another responsible party.

**Objection:** You have the right to object to data processing by us at any time for reasons arising from your particular situation, provided that this is based on the protection of legitimate interests. If you exercise your right of objection, we will stop processing unless we can prove compelling legitimate reasons for further processing which outweigh your rights and interests.

**Objection to direct advertising:** If we process your personal data to conduct direct

advertising, you have the right to object to our processing of your data for this purpose at any time. If you exercise your right of objection, we will stop processing for this purpose.

**Revocation of consent:** If you have given us your consent to process your personal data, you can revoke this consent at any time with effect for the future. The legality of the processing of your data until the revocation remains unaffected.

**Right to lodge a complaint with the supervisory authority**: You can also lodge a complaint with the responsible supervisory authority if you believe that the processing of your data violates applicable law. You can contact the supervisory authority responsible for your place of residence or country or the supervisory authority responsible for us.

Contacting us and exercising your rights: You can also contact us free of charge if you have any questions about the processing of your personal data and your rights as a data subject. Please contact courtyard.yerevan@marriott.com or by post to the address given above under point 1. Please ensure that we can clearly identify you. If you withdraw your consent, you can alternatively choose the contact method you used when giving your consent.

#### 11. Status

The most current version of this data protection declaration applies. Status March 16, 2023.