

# Privacy statement

## Hôtel l'île Saint-Pierre

With this privacy statement, we would like to inform you about the personal data we process in the course of our business activities, including our website [st-petersinsel.ch](https://st-petersinsel.ch). In particular, we explain why, how and where we process which personal data. We also provide information on the rights of those whose data we process. For certain or additional activities, other privacy statements as well as legal documents such as general terms and conditions (GTC), conditions of use or conditions of participation may apply. We are subject to Swiss data protection legislation as well as any applicable foreign data protection legislation, in particular that of the European Union (EU) with the General Data Protection Regulation (GDPR). The European Commission acknowledges that Swiss data protection legislation guarantees adequate data protection.

### 1. Contact addresses

Responsibility for processing personal data:

Swiss Design Collection AG  
Bim Zytglogge 5  
3013 Bern

[welcome@swissdesignhotels.ch](mailto:welcome@swissdesignhotels.ch)

We point out that there may be other data controllers for the processing of personal data in individual cases. Data protection representation in the European Economic Area (EEA) We have the following data protection representation in accordance with Art. 27 RGPD:

VGS Datenschutzpartner GmbH  
Am Kaiserkai 69  
20457 Hamburg  
Germany

[info@datenschutzpartner.eu](mailto:info@datenschutzpartner.eu)

Data Protection Representation serves as an additional point of contact for data subjects and authorities in the European Union (EU) and the rest of the European Economic Area (EEA) for RGPD-related queries.

### 2. Terms and legal basis

#### 2.1 Terms

Personal data is any information relating to an identified or identifiable natural person. A data subject is a person about whom we process personal data.

Processing includes any handling of personal data, regardless of the means and procedures used, for example the interrogation, comparison, adjustment, archiving, conservation, reading, disclosure, acquisition, collection, recording, deletion, revelation, classification, organization, storage, modification, dissemination, linking, destruction and use of personal data.

The European Economic Area (EEA) comprises the member states of the European Union (EU) as well as the Principality of Liechtenstein, Iceland and Norway. The General Data Protection Regulation (GDPR) classifies the processing of personal data as the processing of personal data.

## **2.2 Legal basis**

We process personal data in accordance with Swiss data protection legislation, in particular the Federal Data Protection Act (DPA) and the Data Protection Ordinance (DPO).

We process personal data - insofar as the General Data Protection Regulation (GDPR) is applicable - according to at least one of the following legal bases:

Art. 6 al. 1 let. b RGPD for the necessary processing of personal data for the performance of a contract with the data subject as well as for the performance of pre-contractual measures.

Art. 6 para. 1 let. f RGPD for the necessary processing of personal data to safeguard our legitimate interests or those of third parties, provided that fundamental rights and freedoms and the interests of the data subject do not prevail. Legitimate interests include our interest in being able to carry out our activities in a sustainable, user-friendly, secure and reliable manner as well as to be able to communicate in this regard, to guarantee information security, to prevent misuse, to assert our legal rights and to comply with Swiss law.

Art. 6 para. 1 let. c RGPD for the necessary processing of personal data to fulfil a legal obligation to which we are subject under the applicable law of the Member States of the European Economic Area (EEA).

Art. 6 al. 1 let. e RGPD for the necessary processing of personal data for the performance of a task in the public interest.

Art. 6 al. 1 let. a RGPD for the processing of personal data with the consent of the data subject.

Art. 6 al. 1 let. d RGPD for the necessary processing of personal data to protect the vital interests of the data subject or another natural person.

## **3. Type, scope and purpose**

We process the personal data necessary to ensure that our activities and operations are sustainable, user-friendly, secure and reliable. This personal data may belong to the following categories: basic and contact data, browser and device data, content data, metadata and on-board data, usage data, location data, sales data as well as contractual and payment data.

We process personal data for as long as is necessary for the purpose(s) for which it was collected or as required by law. Personal data that no longer needs to be processed is anonymized or deleted.

We may have personal data processed by third parties. We may also process personal data jointly with third parties or pass it on to third parties. These third parties include specialist service providers whose services we use. We guarantee data protection even with these third parties.

In principle, we process personal data only with the consent of the data subject. To the extent that processing is permitted for other legal reasons, we may dispense with obtaining consent. For example, we may process personal data without consent to perform a contract, to comply with legal obligations or to safeguard overriding interests.

In particular, we process information that a data subject voluntarily provides to us making contact - for example, by post, e-mail, instant messaging, contact form, social media or telephone - or when a user account. We may store this information in an address, a customer relationship management (CRM) system or similar tools. When we receive data about other people, the people transmitting this data are obliged to guarantee data protection vis-à-vis these people, as well as to ensure the accuracy of the personal data.

We also process personal data that we receive from third parties, that we collect from publicly available sources or that we obtain in the course of our activities and operations, insofar as such processing is permitted by law.

We use Smart Host GmbH, Am Kupfergraben 6A, 10117 Berlin (DE) for the following purposes: to facilitate and execute a guest's reservation; to manage a guest's stay; to tailor the stay to the guest's needs and interests; to offer future services in line with the guest's interests; to market the hotel's services and to improve the hotel's services.

## **4. Bewerbungen**

We process the personal data of applicants insofar as this is necessary to assess their suitability for a position or for the subsequent performance of an employment contract. The personal data required comes in particular from the information requested, for example in the context of a job . We also process personal data voluntarily submitted or published by applicants, in particular in the context of cover letters, CVs, other application documents and online profiles.

Insofar as the General Data Protection Regulation (GDPR) is applicable, we process personal data on candidates, in particular in accordance with Art. 9 para. 2 let. b GDPR.

We may allow candidates to deposit their information in our talent pool for future consideration. We may also use this information to maintain contact and keep you informed of new developments. If we feel a candidate is relevant to a vacancy based on the information provided, we may inform them accordingly.

We use third-party services to publish job via e-recruitment and to enable and manage applications.

## **5. Personal data abroad**

In principle, we process personal data in Switzerland and the European Economic Area (EEA). However, we may also export or transfer personal data to other countries, in particular in order to process it there or have it processed there.

We may export personal data to all countries and territories on Earth as well elsewhere in the universe, provided that local legislation guarantees adequate data protection, in accordance with the decision of the Swiss Federal Council and - insofar as the General Data Protection Regulation (GDPR) is applicable - in accordance with the decision of the European Commission.

We may transfer personal data to countries whose legislation does not guarantee adequate data protection, provided that data protection is guaranteed for other reasons, in particular on the basis of standard data protection clauses or other appropriate safeguards. By way of exception, we may export personal data to countries without adequate or appropriate data protection, if the particular data protection conditions are met, e.g. the explicit consent of the data subjects or a direct connection with conclusion or performance a contract. We are happy to provide data subjects with information on request concerning any guarantees or to provide a copy of any guarantees.

## **6. Rights of persons concerned**

### **6.1 Data protection claims**

We grant data subjects all rights in accordance with applicable data protection legislation. In particular, data subjects have the following rights:

Information: Data subjects can ask whether we process personal data about them and, if so, what personal data is involved. Data subjects are also provided with the information they need to assert their data protection rights and ensure transparency. This includes the personal data processed per se, but also, among other things, information on the purpose of the processing, the retention period, any possible disclosure or export of data to other countries and the origin of the personal data.

Rectification and restriction: Data subjects can have incorrect personal data rectified, incomplete data completed and the processing of their data restricted.

Erasure and objection: Data subjects may request the erasure of personal data ("right to be forgotten") and object to the processing of their data with effect for the future.

Surrender and transfer of data: Data subjects may request the surrender of personal data or the transfer of their data to another manager.

We may delay, limit or refuse the exercise of data subjects' rights to the extent permitted by law. We may inform data subjects of the conditions for exercising their data protection claims. We may, for example, withhold information in whole or in part on the grounds of business confidentiality or the protection of others. We may also, for example, refuse the total or partial deletion of personal data on the grounds of legal retention obligations.

In exceptional cases, we may charge a fee for exercising rights. We will inform the persons concerned of any costs in advance.

We are obliged to take appropriate measures to identify data subjects who request information or exercise other rights. Data subjects are obliged to cooperate.

## **6.2 Right to complain**

Data subjects have the right to assert their data protection claims through the courts, or to lodge a complaint with the competent data protection supervisory authority.

The data protection supervisory authority for private managers and federal bodies in Switzerland is the Federal Data Protection and Information Commissioner (FDPIC).

Data subjects have - insofar as the General Data Protection Regulation (GDPR) is applicable - the right to lodge a complaint with the competent European data protection supervisory authority.

## **7. Data security**

We take appropriate technical and organizational measures to ensure data security appropriate to each risk.

However, we cannot guarantee absolute data security.

Access to our website is via transport encryption (SSL / TLS, in particular with Hypertext Transfer Protocol Secure, abbreviated HTTPS). Most browsers indicate transport encryption with a padlock in the address bar.

Our digital communication - like all digital communication - is subject to mass surveillance without reason or suspicion, as well as to other forms of surveillance by security authorities in Switzerland, the rest of Europe, the United States of America (USA) and other countries. We have no direct influence on the processing of personal data by intelligence services, police forces and other security authorities.

## **8. Use of the website**

### **8.1 Cookies**

We may use cookies. Cookies, whether proprietary (first-party cookies) or third-party cookies whose services we use (third-party cookies), are data stored in the browser. This stored data need not be limited to traditional text cookies.

Cookies can be stored temporarily in the browser as "session cookies" or for a specific period of time as "permanent cookies". Session cookies are automatically deleted when the browser is closed. Permanent cookies are stored for a specific period. In particular, they enable us to recognize a browser the next time you visit our website and thus, for example, measure the reach of our site. However, permanent cookies can also be used for online marketing, for example.

Cookies can be deactivated or deleted at any time, in whole or in part, in the browser settings. Without cookies, our website may no longer be fully available. We actively seek - at least to the extent necessary - your explicit consent to the use of cookies.

For cookies used to measure success and reach or for advertising purposes, a general opt-out is possible for many services via AdChoices (Digital Advertising Alliance of Canada), Network Advertising Initiative (NAI), YourAdChoices (Digital Advertising Alliance) or Your Online Choices (European Interactive Digital Advertising Alliance, EDAA).

### **8.2 Server log files**

We may record the following information for each access to our website, provided it is transmitted by your browser to our server infrastructure or can be determined by our web server: date and time, including time zone, IP address, access status (HTTP status code), operating system, including user interface and version, browser, including language and version, specific page of our website accessed, including the amount of data transferred, and the last web page accessed in the same browser window (referrer).

We store this information, which may also constitute personal data, in server log files. This information is necessary to ensure that our website is provided in a durable, user-friendly and reliable manner, as well as to ensure data security and, consequently, to protect personal data - including by third parties or with the help of third parties.

### **8.3 Spy pixels**

We may use web beacons on our website. Web beacons are also known as web beacons. Web beacons - including those of third parties whose services we use - are small, generally invisible images that are automatically downloaded when you visit our website. Web beacons can collect the same information as server log files.

## **9. Notifications and communications**

We send notifications and communications by e-mail and via other communication channels such as instant messaging or SMS.

### **9.1 Measuring success and reach**

Notifications and communications may include web links or web beacons that track whether a notification has been opened and which web links have been clicked. These web links and web beacons may also collect usage data on a personalized basis. We need this statistical tracking of usage to measure success and reach, so that we can send notifications and communications in a way that is efficient, user-friendly, secure, reliable and in line with recipients' needs and reading habits.

### **9.2 Consent and objection**

In principle, you must explicitly consent to the use of your e-mail address and other contact addresses, unless use is permitted for other legal reasons. Wherever possible, we use the "double opt-in" procedure for consent, which means that you receive an e-mail with a web link to which you must click on for confirmation, in order to prevent misuse by unauthorized third parties. We may record consent, including IP address, date and time, for purposes of proof and security.

In principle, you may object at any time to receiving notifications and communications such as newsletters. With such an objection, you can also object to statistical tracking of usage to measure success and reach. We reserve the right to carry out any necessary notifications and communications in connection with our activities.

### **9.3 Service providers for notifications and communications**

We send notifications and communications using specialized service providers.

## **10. Social networking**

We are present on social networking platforms and other online platforms to be able to communicate with interested parties and inform them about our activities. In the context of these platforms, personal data may also be processed outside Switzerland and the European Economic Area (EEA).

The general terms and conditions of use as well as the privacy statements and other provisions of the operators of these platforms apply. In particular, these provisions provide information on the rights of the persons concerned directly with each platform, such as the right to access information.

For our presence on social networks, and in particular for the "Insights Pages" on Facebook, we are, insofar as the General Data Protection Regulation (GDPR) is applicable, jointly responsible with Meta Platforms Ireland Limited (Ireland). Meta Platforms Ireland Limited is part of the Meta companies (particularly in the United States). Pages Insights provide information about how visitors interact with our Facebook presence. We use Page Insights to make our Facebook presence efficient and user-friendly.

For more information on the nature, scope and purpose of data processing, the rights of data subjects and contact details for Facebook as well as Facebook's data protection officer, please see Facebook's privacy statement. We have entered into the "Responsible Persons Module" with Facebook and, therefore, agreed that Facebook is primarily responsible for ensuring the rights of data subjects. Corresponding information about Insights Pages can be found on the "Information about Insights Pages" page, including "Information about Insights Pages data".

## 11. Third-party services

We use specialized third-party services to ensure that our activities are sustainable, user-friendly, secure and reliable. These services enable us to integrate functionalities and content into our website. For such integrations, the services used at least temporarily collect users' IP addresses for imperative technical reasons.

For security, statistical and necessary technical purposes, third parties whose services we use may process data relating to our activities in an aggregated, anonymized or pseudonymized manner. This may include, for example, performance or usage data required to provide each service.

In particular, we use :

Google services: Providers: Google LLC (USA) / Google Ireland Limited (Ireland) for users in the European Economic Area (EEA) and Switzerland; General data protection information: "Privacy and security principles", privacy statement, "Google is committed to complying with applicable data protection laws", "Google product privacy guide", "How we use data from the sites or apps on which our services are used" (information from Google), "Types of cookies used by Google and other technologies", "Personalized advertising" (activation / deactivation / settings).

Microsoft Services: Providers: Microsoft Corporation (USA) / Microsoft Ireland Operations Limited (Ireland) for users in the European Economic Area (EEA), the United Kingdom and Switzerland; General information on data protection: "Privacy at Microsoft", "Privacy and Security (Trust Center)", Privacy Statement, Privacy Dashboard (data and privacy settings).

We pass on personal data to service providers and their auxiliaries who offer cloud-based data processing and software solutions for the hotel, and who, on behalf of the hotel, evaluate and process guest data (for the aforementioned purposes).

### 11.1 Digital infrastructure

We use specialized third-party services to provide the digital infrastructure required for our activities and operations. This includes, for example, hosting and storage services provided by selected service providers.

In particular, we use :

Cloudflare: Content Delivery Network (CDN); Cloudflare Inc (USA); Data protection information: "Privacy", privacy statement, cookie policy.

### 11.2 How to contact us

We use selected service providers to improve our communication with third parties, such as potential and existing customers.

### 11.3 Audio and video conferences

We use specialized audio and video conferencing services to enable us to communicate online. This enables us, for example, to hold virtual meetings, deliver online courses and conduct webinars. To participate in audio and video conferences, the legal texts of each provider's services, such as privacy statements and terms of use, apply additionally.

Depending on your situation, we recommend deactivating the microphone by default when participating in audio or video conferences, as well as blurring the background or using a virtual background.

In particular, we use :

Microsoft Teams: platform, among other things, for audio and video conferencing; Supplier: Microsoft; Teams-specific information: "Privacy and Microsoft Teams".

Zoom: video conferencing; Supplier: Zoom Video Communications Inc (USA); Data protection information: privacy statement, "Privacy at Zoom", "Legal Compliance Center

### 11.4 Mapping

We use third-party services to integrate maps into our website.

In particular, we use :

Google Maps including Google Maps Platform: mapping service; Provider: Google; Information specific to Google Maps: "How Google uses location information".

#### **11.5 Digital audio and video content**

We use specialized third-party services to enable direct playback of digital audio and video content such as music or podcasts.

In particular, we use :

Vimeo: video platform; Supplier: Vimeo Inc (USA); Data protection information: privacy statement, "Privacy".

YouTube: video platform; Provider: Google; YouTube-specific information: "Privacy and Security Center", "My Data on YouTube".

#### **11.6 Fonts**

We use third-party services to integrate selected fonts, icons, logos and symbols into our website.

In particular, we use :

Font Awesome: icons and logos; Supplier: Fonticons Inc. (USA); Data protection information: privacy statement.

Google Fonts: fonts; Supplier: Google; Information specific to Google Fonts: "Privacy and Google Fonts", "Privacy and data collection".

#### **11.7 Electronic commerce**

We engage in e-commerce and use third-party services to successfully offer services, content or merchandise.

#### **11.8 Payment**

We use specialized service providers to process our customers' payments securely and reliably. For the processing of payments, the legal texts of the providers concerned, such as general terms and conditions (GTC) or privacy statements, apply in addition.

In particular, we use :

Wallee Snapswap: payment processing, including mobile payment solutions; Suppliers: Wallee Snapswap and other Wallee companies; Data protection information: general privacy statement, Wallee AG privacy statement.

#### **11.9 Advertising**

We use the option of displaying targeted advertising for our activities on third-party platforms such as social networks and search engines.

We aim to use this advertising to reach people who are already interested in our activities or who might be interested in them (remarketing and targeting). To this end, we may pass on relevant information - possibly including personal data - to third parties who enable such advertising. We may also determine whether our advertisements are effective, i.e. whether they lead to visits to our website (conversion tracking).

Third parties with whom we advertise and where you are registered as a user may associate the use of our website with your profile on these platforms.

In particular, we use :

Facebook Ads: advertising on social networks; Providers: Meta Platforms Ireland Limited (Ireland) and other Meta companies (especially in the USA); Data protection information: remarketing and targeting especially with the Facebook pixel as well as personalized audiences including similar audiences, privacy statement, "Advertising Preferences" (user login required).

Google Ads: search engine advertising; Provider: Google; Google Ads-specific information: advertising based on search queries, among other things, using different domain names - especially doubleclick.net, googleadservices.com and googlesyndication.com - for Google Ads, "Advertising" (Google), "Why do I see this ad?".

Instagram Ads: advertising on social networks; Suppliers: Meta Platforms Ireland Limited (Ireland) and other Meta companies (especially in the USA); Data protection information: remarketing and targeting especially with the Facebook pixel as well as personalized audiences including similar audiences, privacy statement (Instagram), privacy statement (Facebook), "Advertising Preferences" (Instagram) (user login required), "Advertising Preferences" (Facebook) (user login required).

LinkedIn Ads: advertising on social networks; Suppliers: LinkedIn Corporation (USA) / LinkedIn Ireland Unlimited Company (Ireland); Data protection information: remarketing and targeting, in particular with the LinkedIn Insight Tag, "Privacy", privacy statement, cookie policy, opposition to personalized advertising.

Microsoft Advertising: search engine advertising on Bing, DuckDuckGo and Yahoo!; Supplier: Microsoft; Information specific to Microsoft Advertising: "Microsoft Advertising - Privacy policy", "Microsoft Advertising - Legal, privacy and security policy", "Advertising settings" (as opposed to personalized advertising).

## 12. Website extensions

We use extensions for our website to provide additional functions.

In particular, we use :

Google reCAPTCHA: anti-spam protection (distinguishing between wanted comments from human users and unwanted comments from bots and spam); Provider: Google; Google reCAPTCHA-specific information: "What is reCAPTCHA?"

## 13. Measuring success and reach

We try to determine how our online offering is used. For example, we may measure the success and reach of our activities, as well as the impact of third-party links to our website. We may also test and compare how different parts or versions of our online offering are used ("A/B testing" method). The results of measuring success and reach enable us, among other things, to correct errors, reinforce popular content or make improvements to our online offering.

To measure success and reach, the IP addresses of individual users are usually recorded. In this case, IP addresses are generally shortened ("IP-Masking") in order to follow the principle of data minimization through appropriate pseudonymization.

Cookies may be used to measure success and reach, and user profiles may be created. These potential user profiles include, for example, pages visited or content viewed on our website, information on screen or browser window size and location - at least approximate. Generally, any user profiles are created on a pseudonymized basis only and are not used to identify individual users. Some third-party services, to which users are registered, may associate the use of our online offering with the user account or user profile of the service in question.

In particular, we use :

Google Analytics: measurement of success and reach; Provider: Google; Google Analytics-specific information: measurement also across different browsers and devices (Cross-Device Tracking) as well as with pseudonymized IP addresses, transferred in full to Google in the USA only in exceptional cases, "Privacy", "Browser add-on to disable Google Analytics".

Google Tag Manager: integration and management of other services for measuring success and reach, as well as other Google and third-party services; Provider: Google; Google Tag Manager-specific information: "Data collected with Google Tag Manager"; further information on data protection can be found in the integrated and individually managed services.

## 14. Video surveillance

We use video surveillance to prevent crime, ensure the collection of evidence in the event of offences and exercise our right of ownership. In this context, these are, insofar as the General Data Protection Regulation (GDPR) is applicable, overriding legitimate interests in accordance with Art. 6 para. 1 let. f GDPR.

We keep the recordings of our video surveillance for as long as they are required for the collection of evidence.



We may retain recordings in order to comply with legal obligations, to enforce our own legal rights and in the event of suspected offences, as well as passing them on to the competent authorities, in particular the courts or criminal prosecution authorities.

## **15. Final provisions**

We have created this privacy statement using Datenschutzpartner's privacy generator.

We may adapt and supplement this privacy statement at any time. We will inform you of any such changes and additions in an appropriate manner, in particular by publishing the updated privacy statement on our website.

Status: March 2025