

**Your Privacy** is important to us. We value your trust and are committed to protecting and safeguarding any personal information you give us. This document, which we update from time to time, describes how we use and process your personal data and how we use cookies. It also tells you how you can contact us if you have questions about your personal information.

Caftop Group provides online travel services through its own websites and mobile apps and through other online platforms such as partners' websites and social media. The information that follows applies to all of these platforms.

# Privacy Policy

## What kind of personal information does Caftop Group use?

When you make a reservation, you'll be asked for your name, address, telephone number, email address, payment details, the names of guests traveling with you and your preferences for your stay.

To make it easier to manage your reservations, you can open a user account. This allows you to save your personal settings, review previous bookings and manage future reservations.

When you visit our website, even if you don't make a reservation, we may collect certain information, like your IP address, or browser, and information about your computer's operating system, application version, language settings and pages that have been shown to you. If you're using a mobile device, we might also collect data that identifies your mobile device, device-specific settings and characteristics and latitude/longitude details.

We may also receive information about you when you use certain social media services.

## Why does Caftop Group collect, use and share your personal data?

- **Reservations:** First and foremost, we use your personal data to complete and administer your online reservation and forward your reservation details to the accommodation you have booked.
- **Customer service:** We provide international customer service 24/7 from our local offices in more than 8 languages. Sharing your details with our global customer service allows for a quick response when you need us – including helping you find an appropriate services and any questions you might have about your reservation.
- **Guest reviews:** We may use your contact information to invite you to write a guest review after your stay. This can help other travelers choose a place to stay that suits them best.
- **Account administration:** We offer a user account facility on our website. We use the information you give us to administer this, allowing you to manage your bookings, take advantage of special offers, make future reservations more easily and manage your personal settings. Managing personal settings allows you to keep and share lists, share photos, see properties that you've searched for before, and see other information you've provided about accommodations and destinations. It also allows you to see any reviews you submitted about places you stayed in. If you want, you can share certain information in your user account by creating a public profile that's associated with either your own first name or a screen name of your choice. The type of information you can share on this platform includes your photo, the names of places you've stayed in, your lists, your plans for future trips, your reviews and other information about services and destinations.
- **Marketing activities:** We also use your information for marketing activities, as permitted by law. For example:
  - When you make a reservation with us or set up a user account, we may use your contact information to send you news about similar travel-related products and services. We also send our customers regular newsletters by email. You can opt out, or unsubscribe, from marketing communication at any time.
  - Based on the information you share with us, individualized offers may be shown to you on the Caftop Group website, in mobile apps or on third-party websites, including social media sites.
  - When we believe that a particular offer may be of interest to you, we may decide to make contact with you by phone.
- **Other communications:** There may be other times when we get in touch by email, by post, by phone or by texting you, depending on the contact information you share with us. There could be a number of reasons for this:
  - We may need to respond to and handle requests you have made.

- If you haven't finalized a reservation online, we may email you a reminder to continue with your reservation. We believe that this additional service is useful to you because it allows you to carry on with a reservation without having to search for the service items again or fill in all the reservation details from scratch.
- When you use our services, we may send you a questionnaire or invite you to provide a review about your experience with Caftop Group.
- We may also send you other material related to your reservation, such as how to contact Caftop Group if you need assistance while you're away, or a summary of previous reservations you made using Traveler.
- **Market research:** We sometimes ask our customers to take part in market research. Any additional personal details that you give us as part of the market research will only be used with your consent.
- **Fraud detection and prevention:** We may use personal data for the detection and prevention of fraud and other illegal or unwanted activities.
- **Improving our services:** Finally, we use personal information for analytical purposes, to improve our services, enhance the user experience, and improve the functionality and quality of our online travel services.

### **How does Caftop Group use social media?**

We use social media to promote our services partners' properties and to promote, improve and facilitate our own services website. For example, we integrated social media plugins into the Caftop Group website. So when you click on one of the buttons and register with your social media account, information is shared with your social media provider, and possibly presented on your social media profile to be shared with others in your network.

In addition to implementing these buttons, Caftop Group uses social media by maintaining accounts on several social media sites and by offering social apps. These social media services may allow you to share information with Caftop Group. When you register with a social media app, you'll be told which information will be shared with Traveler. The information you choose to share with us may include the basic information that's already available in your social media profile, email address, status updates and your friends list. This information is necessary to create a unique user experience either in the app itself or on our website. It facilitates things like personalizing our website to suit your needs, connecting you with your friends on travel destinations and analyzing and enhancing our travel-related services.

We may also enable you to sign in to Caftop Group services with your social media accounts. Your social media provider will be able to tell you more about how they use and process your data in such cases.

### **How does Caftop Group share your data with third parties?**

In certain circumstances, we may share your personal data with third parties.

- **The accommodation you booked:** In order to complete your reservation, we need to transfer relevant reservation details to the services (hotels/rentals/cars/cruises/tours/activities) you booked with. This may include information like your name, contact and payment details, the names of guests traveling with you and any preferences you specified when making a booking.
- **Your local / Online office:** In order to support you during the reservation process and throughout your stay, your details may be shared with subsidiaries of the Caftop Group corporate family. To find out more about the Caftop Group corporate family, visit [About Caftop Hotels](#). Your information might also be shared with other members of the Caftop Travel group (for example: caftopprints.com, caftophotels.com and caftop shopping) for analysis to provide you with travel-related offers that may be of interest to you and to offer you customized service.
- **Third-party service providers:** We may use third-party service providers to process your personal information on our behalf for the purposes specified above. For example, we may use service providers to send the reservation information on our behalf to the service item you just booked, or we may instruct third parties to contact you. When a reservation requires it, we may also work with third-party payment service providers to facilitate payment or payment guarantees. We also work with third-party advertisement networks to market our accommodation and services on other platforms, or involve third-party providers for analytical purposes. These third parties involved in any of these services will be bound by confidentiality agreements and will not be allowed to use your personal information for any purposes other than those specified above.
- **Competent authorities:** We work with partner websites around the world to distribute the service items listed on our website and mobile apps (Hotels/Rentals/Cars/Cruises/Tour/Activities). When

you make a reservation on one of these business partners' websites, certain personal information that you give them may be shared with us. Similarly, we may share information with this business partner, for example, as part of the administration of your account, in order to manage your reservation, so that they can address queries related to your reservation and for marketing purposes. In this context, your information is governed by the privacy policies of these business partners.

- **Business partners:** We work with business partners around the world to distribute or advertise services and to help our business partners distribute and advertise their travel-related services. This may mean that their services are integrated into our website or they have been enabled to show a customized advertisement on our website – or we are advertising on theirs. When you make a reservation on one of our business partners' websites, certain personal data that you give them will be forwarded to us. Certain business partners may receive your personal data from us if requested by you. When you make a reservation on a business partners' website, please read the privacy policies on these business partners' websites for more information.

### **How does Caftop Group use mobile devices?**

We have free apps for a variety of mobile devices and use versions of our regular website that have been optimized for mobile. These apps and mobile websites process your personal details in a similar way as our website does – and they also allow you to use location services to find services nearby.

### **How does Caftop Group use guest reviews and other destination-related information you share with us?**

After your use any service booked through us, you'll be invited to submit a guest review, which may ask for information about the service item, the surrounding areas, and the destination. If you don't want your name to show with your review, you can use your screen name (which you can choose in your user account) or it can be displayed anonymously. By completing a guest review, you're agreeing that it can be displayed (as further described in our [Terms and Conditions](#)) on, for example, the relevant service information page on our websites, in our mobile apps, in our social media accounts and in social apps, or on the website of the relevant property or on our business partner's website, to inform other travelers about the quality of the service item you used.

If you indicate that a guest review was helpful – or not helpful – we will aggregate this with feedback from other customers in order to sort and prioritize guest reviews. We may use the information in your lists or in other destination-related information you share with us in an anonymous format to help other travelers find the right destination.

## **Cookies**

### **What is a cookie?**

A cookie is a small amount of data that is placed in the browser of your computer or on your mobile device. This Privacy and Cookies Policy applies to cookies and similar technologies (hereafter together referred to as "cookies").

### **Why are cookies used?**

Web pages have no memory. If you are surfing from page to page within a website, you will not be recognized as the same user across pages. Cookies enable your browser to be recognized by the website. So cookies are mainly used to remember the choices you have made – choices such as the language you prefer and the currency you use. They will also make sure you are recognized when you return to a website.

### **Do all cookies do the same thing?**

No, there are different types of cookies and different ways of using them. Cookies can be categorized according to their function, their lifespan and according to who places them on a website.

### **How are cookies used?**

Our website uses the following types of cookies:

- **Technical cookies:** We try to provide our visitors with an advanced and user-friendly website that adapts automatically to their needs and wishes. To achieve this, we use technical cookies to show you our website, to make it function correctly, to create your user account, to sign you in and to manage your bookings. These technical cookies are absolutely necessary for our website to function properly.
- **Functional cookies:** We also use functional cookies to remember your preferences and to help you use our website efficiently and effectively. For example, we remember your preferred currency and language, your searches and the property you viewed earlier. These functional cookies are not strictly necessary for the functioning of our website, but they add functionality for you and enhance your experience.
- **Analytics cookies:** We use these cookies to gain insight on how our visitors use the website, to find out what works and what doesn't, to optimize and improve our website and to ensure we continue to be interesting and relevant. The data we gather includes which web pages you viewed, which referring/exit pages you entered and left from, which platform type you used, date and time stamp information and details such as the number of clicks you make on a given page, your mouse movements and scrolling activity, the search words you use and the text you type while using our website. We also use analytics cookies as part of our online advertising campaigns to learn how users interact with our website after they've been shown an online advertisement, which may include advertisements on third-party websites. We will not know who you are, and we only obtain anonymous data.
- **Commercial cookies:** We use these to show you Caftop Group advertisements on other websites. This is called "retargeting" and it aims to be based on your browsing activities on our website, such as the destinations you've been searching for, the properties you've viewed and the prices you've been shown.

#### **How long do Caftop Group cookies stay active?**

The cookies we use have varying lifespans. The maximum lifespan we set on some is five years from your last visit to our website. You can erase all cookies from your browser any time you want. To remove Caftop Group cookies from your browser, go to the following link (please note that when you click on this link, all Caftop Group cookies will be removed immediately): [Purge Cookies](#).

#### **How can you recognize Caftop Group cookies?**

You can find our cookies in your browser settings.

#### **Does Caftop Group use third-party marketing and analytics cookies?**

YesTraveler uses the services of trusted and recognized online advertising and marketing companies. Caftop Group may also use third-party providers for analytical purposes. To enable their services, these companies need to place cookies.

The providers we use are committed to building consumer awareness and establishing responsible business and data management practices and standards.

When it comes to online advertising and marketing companies, we strive to only work with companies that are members of the Network Advertising Initiative (NAI) and/or the Interactive Advertising Bureau (IAB). Members of NAI and IAB adhere to industry standards and codes of conduct. NAI and IAB members allow you to opt out of the behavioral advertising. Visit [www.networkadvertising.org](http://www.networkadvertising.org) and [www.youronlinechoices.com](http://www.youronlinechoices.com) to identify the NAI members that may have placed an advertising cookie file on your computer. To opt out of an NAI or IAB member's behavioral advertising program, simply check the box that corresponds to the company from which you wish to opt out.

In order to control the collection of data for analytical purposes by Google Analytics, you may want to visit the following link: [Google Analytics Opt-out Browser Add-on](#).

#### **Who has access to Caftop Group cookie data?**

Only Caftop Group has access to Caftop Group cookies. Cookies placed by third parties can be accessed by these third parties.

#### **How can you manage your cookie preferences?**

Using your browser settings in, for example, Internet Explorer, Safari, Firefox or Chrome, you can set which cookies to accept and which to reject. Where you find these settings depends on which browser you use. Use the “Help” function in your browser to locate the settings you need.

If you choose not to accept certain cookies, you may not be able to use some functions on our website. Plus, opting out of an online advertising network doesn’t mean that you won’t receive or be subject to online advertising or marketing analysis. It means that the network you opted out of will no longer deliver ads tailored to your web preferences and browsing patterns.

#### **Does Caftop Group use web beacons?**

In addition to using cookies, Caftop Group sometimes uses web beacons. A web beacon is a tiny graphic image of just one pixel that’s delivered to your computer either as part of a web page request or in an HTML email message. Either directly or through service providers, we use these pixels as part of our online advertisements either on our website or on third-party websites to learn whether a user who is being shown an online advertisement also makes a reservation; to track conversion with partner websites and to analyze a user’s traffic patterns in order to optimize the travel-related services we bring to you.

## Security

#### **What security procedures does Caftop Group put in place to safeguard your personal data?**

In accordance with European data protection laws, we observe reasonable procedures to prevent unauthorized access and the misuse of personal information.

We use appropriate business systems and procedures to protect and safeguard the personal information you give us. We also use security procedures and technical and physical restrictions for accessing and using the personal information on our servers. Only authorized personnel are permitted to access personal information in the course of their work.

Your credit card details – when they are needed as part of the reservation process – are stored for a maximum of 10 days. After that, your credit card data will be either permanently deleted from our systems or will remain hashed in our system for fraud detection purposes. This is unless you have chosen to store your credit card details in your personal account.

## Children

The services offered by Caftop Group are not directed at children under 18 years old. The use of any of our services is only allowed with the valid consent of a parent or a guardian. If we receive information from a child under 18 years old, we reserve the right to delete it.

## Contact Us

#### **How can you control the personal data you have given to Caftop Group?**

You always have the right to review the personal information we keep about you. You can request an overview of your personal data by emailing us at [admin@caftophotels.com](mailto:admin@caftophotels.com). Please write “Request personal information” in the subject line of your email and include a copy of your identity card to help us prevent unauthorized individuals from accessing your personal data.

If the personal information we have for you is incorrect, we will update it at your request. You can also ask us to remove your personal data from our customer database by sending an email to [admin@caftop.com](mailto:admin@caftop.com) with “Request for removal of personal information” in the subject line. However, we may need to retain certain information, for example, for legal or administrative purposes, such as record keeping or to detect fraudulent activities. You can delete your user account at any time by signing into your account on the Caftop Group website and choosing to remove your account.

#### **Who is responsible for the processing of personal data on the Caftop Group website and apps?**

Caftop Group controls the processing of personal data on its websites and mobile apps. Caftop Group is managed by Caffos Consult Ltd, a private limited liability company, incorporated under the United Kingdom laws and has its online offices in caftop.com. If you have any suggestions or comments about this privacy notice, please send an email to [admin@caftop.com](mailto:admin@caftop.com)