



Veytaux, 7 April 2020

PRIVACY POLICY

1. What does this policy cover?

This Privacy Policy (hereinafter the '**Policy**') sets out the basis on which Chillon Castle Foundation (hereinafter '**Chillon Castle**', '**us**' or '**we**') will process data collected from you, data which you have provided to us or which we can collect from other sources. This covers the various ways you interact with us, most notably in person, via email or telephone, via the website and/or our mobile app (hereinafter the '**Website**') or interactive screens.

'**Personal Data**' means any identifiable or identified information relating to an individual.

We ask that you read the following document very carefully to gain a better understanding of how we process your Personal Data.

2. Data Controller

For the purposes of data protection outlined in this Policy, the data controller is Chillon Castle, whose registered office is at Avenue Chillon 21, 1820 Veytaux (Switzerland) and who can be contacted by email at the following address: aline.mean[at]chillon.ch. The data controller most notably manages the Website <https://www.chillon.ch>.

In addition to access to its Website, Chillon Castle may offer users (hereinafter the '**Users**') various information services from its premises, by telephone, email or online (hereinafter the '**Services**').

We hope to be able to answer any questions you may have with regard to how we process your Personal Data. If you have any questions about how we collect, store and use your Personal Data, please contact us at aline.mean[at]chillon.ch.

3. Personal data we collect

3.1 When you contact us

When you contact us or communicate with us (for example via email, letters, telephone calls, online or at our ticket offices) we may collect the Personal Data you provide to us. This Personal Data can be your full name, postal address, email address and your telephone number(s), as well as your booking information.

This Personal Data is collected with the aim of providing Services and is processed in order to fulfil a joint contract between us and you.



3.2 When you subscribe to our newsletter

You may subscribe to our newsletter and, if you do so, we will request your email address, your first name and surname, and additional optional information such as your language preference and country of residence. We process this Personal Data in order to customise the information and offers we send to you and to better match them with your interests.

When you subscribe, you grant us permission to process the Personal Data collected with a view to sending you regular newsletters. This permission is considered consent and constitutes the legal basis for the processing of your Personal Data within this context. If the law in force does not require consent, our legitimate interest in keeping you informed will justify us sending regular newsletters.

You can unsubscribe from the newsletter at any time using the link at the bottom of each newsletter.

3.3 When using the Website

When using the Website, we may automatically collect the following Personal Data:

- Your full name, postal address, email address and telephone number(s);
- Information concerning how you use our Website, including your username and password and any information you share with us or input into our Website;
- Technical data, most notably the IP (Internet Protocol) address used to connect your computer to the internet, the type of mobile device you are using, a unique device ID (e.g. your telephone's IMEI number, the MAC address for your wireless network interface or the telephone number the device is registered to);
- Details relating to payments made on our Website;
- Your location data.

This Personal Data is most notably collected via cookies and similar technologies, the use of which is covered by article 6 of this Policy.

We collect this technical data on the basis of our legitimate interest in offering you the best user experience on our Website and in order to develop new Services. The processing of your payment details is justified by the joint contract between us and you. The processing of all other Personal Data is subject to your consent.

3.4 When using social media

When you authorise a third-party social media platform (such as Facebook, Twitter, Google+, YouTube, LinkedIn, Pinterest, Instagram, TripAdvisor, etc.) to share your Personal Data with us, we may receive all Personal Data which you publicly share on said social media platform, including information which appears on your profile or which you authorise the platform to share (e.g. your name, email address, gender, profile picture, friends list or contact list, preferences, etc.).

Chillon Castle will also receive Personal Data relating to your profile when you use a social media plugin on the Website, or when you interact with us on a social media platform.

It is your responsibility to keep up to date with conditions of use as well as the privacy policy applicable to social media platforms. This Personal Data is collected with the aim of customising and improving your experience and keeping you informed on offers or updates that may be of interest to you. It is processed on the basis of your consent.



4. How long we keep your Personal Data

We will keep your Personal Data for as long as is necessary to provide our Services or to meet the objectives set out in this Policy. This is assessed on a case-by-case basis and depends on aspects such as the nature of the Personal Data, the reason for its collection and processing, and for any relevant legal or operational purposes.

In some instances, we may anonymise your Personal Data so that you are not identifiable, in which case we may use this information without notice. We will only use and store your information for as long as is required for the purposes for which it was collected, after this we will securely safeguard and destroy your Personal Data in line with the laws and regulations in force.

5. How we share your data

5.1 With our Partners

With your consent, we may share your Personal Data with our Partners to better meet your needs and respond to your requests.

5.2 With our subcontractors

We may also share your Personal Data with people and companies who provide us services as subcontractors, most notably providers of online booking and ticket office services, information and tourism recommendation services, newsletter editing and distribution services, marketing analysis services, advertising services, IT storage services, maintenance services, call centre services and credit card payment services. Our subcontractors are bound by a confidentiality agreement and may only use your data in line with our instructions and this Policy.

5.3 With third parties

If required by law, your Personal Data may also be sent to government, legal, or administrative authorities in order to protect our rights and our legitimate interest. When required, it may also be sent to third parties to defend our legitimate interest or that of third parties.

6. Cookies policy

6.1 What are cookies?

Cookies are small text files stored on your computer when you visit certain websites. They are sent from a Web server to a browser, giving the server unique identifiers for each browser page. Other similar technologies are also in use, including tracking pixels and URL redirection (or URL forwarding). Tracking pixels (also known as clear GIFs or web beacons) are placed on certain pages of our Website and give us a generic overview of your use. If you deactivate cookies, tracking pixels simply detect an anonymous visit to our Website.

URL redirection, on the other hand, is used to determine how you got to our Website. All of these and similar technologies are classed as 'Cookies' in the framework of this Policy.

The Cookies serve many different purposes: for example, they help you move between pages more efficiently by memorising your preferences and optimising your general user experience. They also ensure that any advertising displayed online is suited to you and your interests.

The Cookies themselves do not identify an individual user, they only identify the computer or mobile device you are using through a randomly generated ID tag.



For more information on Cookies, please go to <https://www.allaboutcookies.org> or <http://www.youronlinechoices.com> where you will find additional information on targeted advertising and online privacy.

6.2 What type of Cookies do we use?

6.2.1 Our Cookie policy

The types of Cookies (including those used by our subcontractors) we use on our Website, as well as their purpose, are indicated below:

- **Category 1: Strictly necessary Cookies**

These are cookies that are required for you to properly browse and use our Website. Without these Cookies, several elements of our Website may be blocked or may not work properly.

We use these Cookies so you can access the Services we offer on our Website. Personal Data collected by these Cookies is processed on the basis of our legitimate interest in the proper functioning of our Website.

- **Category 2: Analytical/performance Cookies**

These Cookies gather information on the way you or other Users use our Website, for example, identifying which pages you visit most often and if you receive any error messages on our Website pages.

We use these cookies to ensure our Website is working effectively and to gain an understanding of how it is used. Most of the time, these Cookies do not collect identifiable data. If Personal Data is collected by these Cookies, it will be processed on the basis of our legitimate interest in understanding and optimising the use of our Website.

- **Category 3: Functionality Cookies**

These Cookies enable our Website to store your preferences (such as your username, language or location) and can also be used to provide the Services you have requested.

We use these Cookies us to improve the way our Website works and to gain an understanding of how it is used, as well as to offer a seamless browsing experience. Personal Data collected by these Cookies are processed on the basis of our legitimate interest in offering a user-friendly Website.

- **Category 4: Targeting and advertising Cookies**

We use these Cookies to get to know Users of our Website, to adapt Website content, to carry out statistical analyses on how the Website is used and to display personalised ads on third-party sites. All of this is carried out on the basis of you expressing your interest in our Services while using our Website. In certain instances, they enable us to provide advertising that is better suited to you and your interests.

You can switch off Cookies at any time through your internet browser settings. Where required by applicable law, these Cookies will only be put in place with your consent. We keep track of your consent using technical Cookies; each time you delete Cookies from your devices, we must re-request your consent to use these Cookies.



We mainly use Google Analytics and Google Analytics Advertising Features to anonymously monitor usage and activity on our Website. Google Analytics is a Web analysis service provided by Google LLC ('Google'). Google Analytics uses the Cookies to analyse how you use the Website. You can find out how Google uses the Personal Data it collects from you on their website: <https://policies.google.com/technologies/partner-sites>. You can opt out of these Cookies by downloading and installing the browser plugin available on <https://tools.google.com/dlpage/gaoptout>. An opt-out Cookie will be activated on your computer to prevent your Personal Data from being collected in future. For additional information on terms of service and privacy, go to <https://www.google.com/analytics/terms> or <https://policies.google.com>.

6.2.2 Third-party Cookies

We sometimes use applications on our Website that are owned by third-party organisations. These applications enable you to share content from our Website with other people, or to share your feedback or opinion on our Website content with these people.

The use and transmission of Cookies by these third parties are subject to their privacy policies. These Cookies are not under our control. If you would like to know how these Cookies work, please consult the privacy policy of the relevant social media platforms.

7. Transferral abroad

Your Personal Data will mainly be processed in Switzerland but may also be processed in other countries where appropriate. We will respect the applicable rules and adopt all necessary measures prior to your Personal Data being sent abroad. You can obtain a copy of these measures using the contact details indicated in article 2 of this Policy.

8. How we protect your data

With a view to better protecting your Personal Data, we take security measures pursuant to data best practice. This includes, most notably, limiting access as well as taking any technical and organisational measures.

However, please note that we cannot absolutely guarantee the security of your Personal Data, hence the storage and email transfer of your Personal Data presents certain risks.

9. Your rights

You have a certain number of rights pursuant to Personal Data protection legislation. These rights may be limited, most notably when they infringe the rights and freedoms of others. We will inform you of any applicable exceptions when answering any of your questions.

These rights include:

- Right to access: you have a right to know what Personal Data is held by us and to request (in writing) access in order to consult your Personal Data. We will provide this information as quickly as possible, within one month at the latest, except in the case of complex requests. We may ask you for proof of identity before disclosing your Personal Data. Please use the contact details provided in article 2 of this Policy.
- Right to be informed: you have the right to be informed on how your Personal Data will be used. This Policy, along with any additional information or notifications sent to you when you gave us your details, or otherwise, is designed to provide you with this information.



- Right to withdrawal of consent: where you have given consent for the us to use your Personal Data (for example to send you text messages or marketing emails), you have the right to withdraw that consent at any time. To do so, please use the contact details provided in article 2 of this Policy.
- Right to object: you also have the right to object to the use of your Personal Data when we use it in our legitimate interest. To do so, please use the contact details provided in article 2 of this Policy.
- Right to restrict processing: in some situations, you have the right to request that processing of your Personal Data be restricted, either if you have issues with the content of the information we hold or how it is used.
- Right to erasure (to be forgotten): in some circumstances, you have the right to have your Personal Data erased. When you have requested not to receive marketing documents from us, we must keep certain information to make sure that you will not be contacted in future.
- Right to rectification: if you see or think that your Personal Data is incorrect, you have the right to request it be updated. To do so, please use the contact details provided in article 2 of this Policy.
- Right to portability: when we process your Personal Data with your consent, or because this processing is necessary for fulfilment of a contract, you have the right to request that your data be transmitted from one service provider to another.
- Right to make a complaint: if you are not satisfied with the way we have processed your Personal Data, you have the right to file a complaint with the Swiss Federal Data Protection and Information Commissioner (*Préposé fédéral à la protection des données et à la transparence* – PFPDT) or the relevant authority in your country of residence.

10. How we inform you of changes made to our Privacy Policy

We may update this Policy from time to time without warning; please check it regularly. We will, however, aim to draw your attention to any significant changes.

11. Jurisdiction and applicable law

This Policy and any issues stemming from or related to it, as well as the use of the Website and Services, are regulated by Swiss Law, excluding conflict-of-law rules.

You hereby submit to the exclusive jurisdiction and venue of the courts based in the region of Chillon Castle's headquarters.