

INFORMATION NOTICE ON PERSONAL DATA PROTECTION

Subject of the Information Notice on Personal Data Protection

A.K IERAX L.P (Airport Suites Michelle), with registered office at 32 Dimarchou Christou Mpeka 32, Spata, Postal Code 19004 (hereinafter the “Company”), in its capacity as Data Controller, collects and processes your personal data only when absolutely necessary, for clear and lawful purposes, based on Regulation (EU) 2016/679, Law 4624/2019 and Law 3471/2006 as in force. This information notice aims to inform users of the website <https://www.airportsuitesmichelle.com> regarding the processing of their personal data.

Definitions

For the purposes of this Policy, the following terms have the following meanings:

- **“Personal Data”**: any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one whose identity can be determined, directly or indirectly, in particular by reference to an identifier such as name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- **“Special categories of personal data”**: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- **“Processing”**: any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **“Anonymization”**: the processing of personal data in such a manner that the data can no longer be attributed to a specific data subject.
- **“Pseudonymization”**: the processing of personal data in such a manner that the data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and subject to technical and organizational measures to ensure that the personal data cannot be attributed to an identified or identifiable natural person.
- **“Data Controller”**: the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such

processing are determined by Union or Member State law, the controller may be designated by Union or Member State law.

- **“Processor”**: a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.
- **“Consent”** of the data subject: any freely given, specific, informed, and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- **“Personal data breach”**: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed.
- **“Applicable Law”**: the national and Union legislation on personal data protection, specifically the General Data Protection Regulation (EU) 2016/679 (hereinafter “GDPR”), Law 4624/2019, Law 3471/2006, the case law of the Court of Justice of the European Union (hereinafter “CJEU”), as well as the Decisions, Guidelines, and Opinions of the European Data Protection Board (hereinafter “EDPB”) and the Hellenic Data Protection Authority (hereinafter “HDPa”).

Personal Data Collected and Processed by the Company

During browsing and using the website, the following personal data are collected and processed:

1. Reservation

Personal Data	Source	Purpose	Legal Basis	Retention Period	Recipients
First Name	Smoobu	Booking property	Article 6(1)(b) GDPR		Property Owners, (AADE)
Last Name					
E-mail					
Phone					
Country					
Message content to the owner					
Arrival/Departure time					

2. Communication

Personal Data	Purpose	Legal Basis	Retention Period	Αποδέκτες
First Name	Communication handling	Article 6(1)(f) GDPR – legitimate interest	Until the communication is completed or as required by law	Internal use by the owner / data controller
Last Name				
E-mail				
Phone Number				
Message content to the owner				

Data Collected Automatically

When you use our Website, we automatically collect information, some of which may constitute personal data. This includes information such as language settings, IP address, location, device settings, device operating system, activity data, time of use, redirect URL, status reports, user information (including browser version), operating system, browsing outcome (visitor or registered customer), browsing history, and the type of data you viewed. Data may also be collected via cookies. For information regarding the use of cookies, [click here](#).

Collection and Further Processing of Personal Data of Minors

As a rule, the Company does not directly or indirectly collect and process data of minors (i.e., persons under the age of 18). However, since it is impossible to verify the age of individuals accessing or using the website, parents or guardians of minors are advised to contact the Company directly if they discover any unauthorized disclosure of data by the minors under their responsibility, in order to exercise the rights provided to them, such as deletion of their data. Should the Company become aware that it has collected personal data of a minor, it commits to immediately delete them and take all necessary measures to protect such data.

Transfer of Personal Data outside the EEA

As a principle, the Company does not transfer your personal data to third countries and/or International Organizations. In case of a transfer to a country outside the European Economic Area (EEA) or an International Organization, the Company ensures in advance that one of the lawful bases of Article 6 of the GDPR applies, and cumulatively:

- The Commission has issued an adequacy decision for the third country to which the transfer is made (Article 45 GDPR), or
- Appropriate safeguards under the GDPR exist for the transfer of such data (Article 46 GDPR), or
- For occasional processing, one of the exceptions under Article 49 GDPR applies (e.g., explicit consent of the user, transfer necessary for contract performance, public interest reasons, support for legal claims or vital interests of the data subject).

Security of Personal Data

Taking into account the latest technological developments, the cost of implementation, and the nature, scope, context, and purposes of processing, as well as the varying likelihood and severity of risks to the rights and freedoms of data subjects, the Company implements the necessary technical and organizational measures to protect such rights. Although no method of transmission via the Internet or electronic storage is completely secure, the Company takes all necessary digital security measures (e.g., antivirus), in compliance with its obligations under the Applicable Law.

Rights of Data Subjects

The Company ensures it can respond promptly to requests of data subjects to exercise their rights under the Applicable Law.

Specifically, every data subject has the following rights:

Access	Rectification	Deletion
Restriction		

Additionally, the data subject has the right to object to the processing of their personal data by the Company.

In case of exercising any of the above rights, the Company shall respond immediately [in any case within thirty (30) days of receipt of the request], informing you in writing of the progress in fulfilling it.

For any complaint regarding this notice or issues related to personal data protection, if the Company does not satisfy your request, you may contact the Hellenic Data Protection Authority at: <http://www.dpa.gr/>

Disclaimer for Third-Party Websites – Social Media Buttons

This Website contains social media buttons – Social media widgets (e.g., Facebook, Instagram). When the user logs into the social network, a special digital footprint is created, for which both the Company and the social network act as joint data controllers. For the Company, the purpose of processing such data is to improve the functionality of the website and services offered and to analyze website traffic. The lawful basis for processing personal data is [the legitimate interest of the client, specifically interoperability with applications used by the client].

The Company does not control or assume responsibility for any further processing carried out by the joint Controllers.

For more information regarding data processing policies and setting options of these networks, please visit:

- <http://www.facebook.com>
- <https://www.instagram.com/>
- <https://www.linkedin.com/>

- <https://twitter.com/>

Updates to the Privacy Policy

This Privacy Policy may be modified/revised in the future, in line with the Company's regulatory compliance, as well as optimization and upgrading of the Website services. We therefore recommend consulting the updated version of this Policy regularly to stay adequately informed.

January 2026