

Privacy Policy

Last updated: _____2025

1. General

- 1.1. Elco Alpha Ltd., Co. no. 516250891, the owner and operator of the George Hotel (in Tel Aviv hereinafter: the "**Hotel**", "**we**" or "**us**"), is the owner and operator of the website <https://thegeorgetelaviv.com/he/> (hereinafter: the "**Website**"), as well as any web page, mobile application, web service or other online service operated by the Hotel (collectively: the "**Services**" or "**Our Services**").
- 1.2. We are committed to protecting your privacy and the personal information you share with us when using the Services.
- 1.3. We respect the privacy of users (hereinafter: the "**User(s)**" or "**You**") of our services and of the hotel services, and are committed to protecting the personal information collected about them. We believe that our users have the right to know our policies regarding the collection and use of information received by us while using the Services.
- 1.4. This Privacy Policy (hereinafter: the "**Policy**") relates to the collection, use and retention of personal information collected as part of the use of our services. We are committed to being transparent and responsible in handling this information.
- 1.5. This policy constitutes an integral part of the Terms of Use Policy and the Hotel's Customer Club Regulations (the Club, as defined hereafter) (hereinafter, collectively: the "**Terms of Use**"), and they do not derogate from what is stated therein.
- 1.6. The hotel may update the terms of the privacy policy and terms of use from time to time. Material changes will be brought to the attention of users by means such as notices on the website or by other means (for example, via email or text messages).
- 1.7. To use our services, you must agree to the terms of the policy hereafter. It is possible that for certain services an additional privacy policy will apply, which will be in effect alongside and/or in addition to this policy. If you do not agree to the terms of this policy, in whole or in part, you are asked to refrain from using the services and the website.
- 1.8. This policy is written in the male gender for convenience only, but it is intended for all genders equally.

2. Definitions

- 2.1. **Database Controller:** A person, organization, public authority, agency or other body that determines, alone or with others, the purposes for which and the means of using personal information, and is responsible for controlling the processing of the information in accordance with the law.
- 2.2. **Applicable Law:** For the purpose of this Privacy Policy, the applicable laws are the privacy laws of the State of Israel, including the Privacy Protection Law, 5741-1981 (hereinafter the "**Law**"), with all of its amendments, the Privacy Protection Regulations (Information Security), 5777-2017, the Privacy Protection Regulations (Provisions Concerning Information Transferred to Israel from the European Economic Area), 5783-2023, and any directive, standard or administrative provision published from time to time by the Privacy Protection Authority. This law includes any future update or amendment, including guidelines and interpretations that are (and/or will be) binding on entities operating in Israel.
- 2.3. **Holder (processor):** Any other person or entity (who is not an employee of the database controller) that performs personal information processing operations on behalf of the controller.
- 2.4. **Personal information:** Any data relating to an identified or identifiable natural person with reasonable effort, directly or indirectly, including name, identity number, email, location data, unique digital identifier (such as IP or cookie ID), biometric characteristics and any other data that can be used to uniquely identify the person or may affect their privacy and private life.

3. **The Database Owner and how to contact him**

For the purposes of this policy, the database controller is:

- 3.1. Full company name + address - Elco Alpha Ltd., co. no. 516250891, 98 Alon Yigal Street, Tel Aviv-Jaffa.
- 3.2. You can contact us regarding any matter related to personal information via the email address: [REDACTED]

4. **What information is collected from users ?**

- 4.1. During your use of our services, we may collect your personal information in various ways. In this section, we will detail how the information is collected, what it is used for, what the purposes of the processing are, and how long it is retained.
- 4.2. In general, we collect and store data about you when you access, use our services, or provide information to us directly. This data includes details that allow us to

identify you, manage your account, provide you with tailored services and improve your experience using our services.

5. **Data you provide to us directly**

- 5.1. **Making a hotel reservation.** When making a room reservation and/or other services related to the hotel and/or the members' club, through the website and/or the customer service center and/or, as set forth and defined hereafter, as part of ordering additional services, personal information that you provide to us with your consent is collected, including full name, telephone number, passport number, date of arrival and length of stay, number of rooms and people in the reservation, type of room requested and special requests such as type of bed or meals, age of children as applicable, email address and credit card details that are processed securely through an external payment provider. The purposes of the processing are to process the order, bill and document the transaction, coordinate the stay, and contact you if necessary.
- 5.2. **During your stay at the hotel.** During your stay, additional information is collected with your consent regarding the services you used, such as the dates of your stay, purchases you made, your personal preferences in the areas of food, drink and other services, as well as the conversations you had with the service center or reception, which may be recorded for monitoring, employee training and service improvement. In addition, information may be collected regarding certain behavior, as recorded by security cameras on the hotel grounds. The purposes of processing are to manage your stay, provide personalized services, maintain safety, and improve the customer experience.
- 5.3. **Demographic information.** When you interact with us, demographic information such as age, gender, country of origin, language preference or religion may be collected with your consent. The purposes of processing are to analyze guest characteristics, improve service, and adapt communication and language.
- 5.4. **Ordering additional services.** When ordering additional services such as conference rooms, a gym, spa treatments or hotel restaurants, you will be asked to provide personal information according to the nature of the requested service and with your consent (hereinafter and hereinafter: the "**Additional Services**"). For example, to book meeting rooms or conference halls, a full name, telephone number, email address and special requests are required; to book a workout in the gym, which is operated by an external provider, a full name, telephone number, type of workout, health declaration and information about medical restrictions, if any, are required; to book a spa treatment, which is also operated by an external provider, a full name, telephone number, type of treatment, health declaration and information about medical restrictions, if any, are required; to book a place in the hotel

restaurants, a full name, telephone number, date of arrival and preferences or dietary restrictions, if any, are required. The purposes of the processing are to coordinate services, tailor them to your personal needs, and maintain continuity of service.

- 5.5. **Contact inquiries.** When you contact us via a form on the website, via email or telephone, personal information including your full name, telephone number, email address and the content of the inquiry is collected with your consent. To the extent you choose to enter additional personal information in the contact form, this will be considered voluntary disclosure, and we will process it in accordance with this policy. The purposes of the processing are to handle your inquiry, document the service, and maintain continuity of response.
- 5.6. **Subscribe to the newsletter.** When you sign up for the newsletter, you will be asked to provide your name and email address. This information is collected with your consent and is used to send updates, offers, benefits, and marketing content. You can remove yourself from the list at any time using a dedicated link or by contacting us.
- 5.7. **Club members.** As mentioned, the hotel operates a unique members' club in accordance with the rules set forth in the link. [Club rules](#) (hereinafter: the "**Club**"). For the purpose of registering as a club member, personal information that you provide to us with your consent is collected, including full name, date of birth, ID number, gender, photo (if you choose to provide), payment information, telephone number, referral information and your personal preferences regarding hotel services. The purposes of the processing are to manage club membership, tailor services to its members, provide unique benefits, process payments, and improve the customer experience.

In addition, we may photograph you during club events or other activities as part of the ongoing documentation of club activities. The images and photographs may be used in membership programs, marketing publications, promotion and public relations, or for other business purposes. By participating in these events, you agree that your name, image, and other personal information about you will be used for the purposes specified. Also, by joining, you declare that you agree to the publication of any material produced by us or on our behalf in which you appear, without the need to obtain additional consent and without any right to receive consideration or payment in connection with the use of these publications.

6. **Data we collect when you use our services**

- 6.1. **Personal information collected when browsing the website.** During your use of the website, we may automatically collect technological information relating to your

browsing, such as your IP address, the type of browser you use, the pages you visit and other information about browsing patterns. Information is collected using technological tools, including cookies. The purposes of processing are to secure the website, adapt the content to users, improve the browsing experience, and control usage.

- 6.2. **Personal information collected from third parties.** We may receive additional personal information about you from third parties, such as travel agents or booking sites, and combine it with the information we collect during your use of our services. The purposes of the processing are to manage the orders received, verify data and provide continuous and uniform service to guests.
- 6.3. **Customer service and the call center.** When you contact us by phone, send an email, fax, or contact us via online chat, we may collect personal information including your details and the content of the contact. Telephone calls to the service center may be recorded for monitoring, employee training, and improving service quality. The purposes of the processing are handling inquiries, ongoing documentation, and maintaining a high standard of service.
- 6.4. **Security cameras and electronic card.** During your stay at the hotel, we use security cameras placed in public areas such as the lobby, corridors and hotel courtyards, as well as information collected through the electronic card provided to you for access to rooms and various areas. The information includes the time of entry to the room and additional card usage details. The purposes of the processing are maintaining security and safety, access management and operational control.

7. **Data we collect from third parties**

- 7.1. **Information from companies that provide services and products.** We may receive information from companies that offer services or products related to our Services, or from companies whose products or services are linked to our Services. This information may include details about how their services are used, user behavior, or technical data we need to improve our services.
- 7.2. **Sharing information with related companies .** In some cases, we share information with other companies. This sharing allows us to provide continuous services, cross-border support, and service improvements in every region where you use our products or services.
- 7.3. **Data analysis using third-party services.** We use third-party analytics services, such as Google Analytics, to understand how you use our services. Information collected in this context includes IP address, browser type, login and logout pages, duration of use, and other actions you have taken. This information helps us improve

the performance of the services and the user experience. Sometimes, affiliated companies or business partners may also collect this type of information for analytics purposes, in accordance with the permissions granted and in accordance with applicable law.

7.4. Targeted advertising and marketing data. In the framework of partnerships with advertisers and marketing providers, we may receive information about your interactions with our ads. This information includes data about the media source from which you came to the Services, ad clicks, and activity details related to our campaigns. This data helps us measure the effectiveness of campaigns, adapt marketing messages, and improve the user experience.

7.5. Information from social platforms. When you interact with our services through social platforms, such as social networks, the information you share there may reach us. This information is collected in accordance with the platforms' privacy policies, and helps us offer personalized experiences and support you effectively.

We use information received from third parties to improve services, analyze performance, personalize the user experience, and support marketing campaigns. The data is retained for the period of time required for these purposes or in accordance with legal requirements, and is processed in accordance with our privacy policy.

As a general rule, the information provided by the user and the information collected about him by the hotel will be stored and processed by the hotel in accordance with the provisions of applicable law, including storing it in registered databases of a third party and/or ours. The information will be stored on the hotel's servers or on third-party servers, including through "cloud" services, in Israel and/or abroad. By using the hotel's services, the user agrees to the storage and processing of the information as aforesaid. The use of the information will be in accordance with the purposes of these databases and as stated in this policy.

The user may choose not to provide information or not to allow the company to collect or process the information in accordance with the uses detailed above. However, it should be taken into account that in some cases, refusal to provide or process the information may limit the hotel's ability to provide the services in a complete, proper or personalized manner to the user's needs. If the required information is essential to operate the services, some of the services may not be available to the user.

8. Cookies

8.1. What are cookies? Cookies are small text files that are stored on your device when you visit websites, apps, or use online services. Some cookies are deleted when you close your browser, while others are stored on your device for a certain period of

time. Cookies contain a variety of information, such as pages you visited, the length of time you spent on them, where you came to the site or service from, and content viewed. The information contained in cookies is encrypted and we take advanced precautions to protect it.

8.2. **Purposes of using cookies.** We use cookies and similar software for a variety of purposes aimed at improving the services and tailoring them to your needs. Cookies are used for the ongoing and proper operation of the services, including ensuring continuous operation of the website. In addition, cookies allow us to collect statistical data on how our services are used, in order to perform analysis and testing aimed at improving and optimizing the services.

8.3. Cookies also help us tailor services and content to the user's personal preferences, creating a personalized experience. They are used to identify users, verify details, and prevent fraud and scams, thus providing an additional layer of security to the services. Cookies also contribute to improving the user experience by adapting the services to the specific needs of each user.

8.4. **Types of information collected through cookies.** Cookies may collect information such as IP address, device ID, your device characteristics, content you have viewed, the amount of time you have spent on the website or services, and browsing habits. Sometimes information is also stored regarding actions you have taken on other services or sites.

8.5. **Control and choosing cookie settings.** You can control cookies in several ways that suit your needs. You can block or delete cookies through your browser settings. However, it is important to remember that blocking cookies may limit the use of some of the services and features offered on our website, app or online services. Additionally, you can delete cookies stored on your device at any time through your browser settings. This may require you to reconfigure preferences each time you visit our Services.

8.6. **Effect of disabling cookies.** If you do not want to receive cookies, you can avoid this by changing the settings in your browser. However, please remember that disabling cookies may mean that you will not be able to use some of the services and features offered on the website and platform. In addition, you may delete the cookies on your computer at any time.

9. **Marketing mail and promotional messages**

We may use the contact information you provide to us (during registration for services, purchase of products, or in any other case where contact information was provided) to

send updates, advertisements, marketing offers, newsletters, alerts and operational messages.

10. What information do we share with third parties?

10.1. General. The hotel will be entitled to share information about the user with third parties, in Israel or abroad, including entities related to the company, subject to the user's consent or when sharing is required by law. Information will be shared to the extent necessary for the provision of services, in a controlled manner and while maintaining defined and clear goals, as set forth hereafter.

10.2. Collaboration with technological and operational service providers. We use third-party services to manage your information, including IT service providers, cloud service providers, clearing services, and customer service and support software. These third parties are authorized to process data on our behalf for the purpose of providing the relevant services only, and are not permitted to use the information for other independent purposes. In addition, we may share information with information security service providers who monitor and prevent digital threats or handle cases of information breaches.

10.3. Sharing for marketing purposes. The hotel may share your personal information with partner marketing companies for the purpose of marketing activities, subject to your consent. In addition, we may share information with digital marketing platforms to measure the effectiveness of advertising campaigns.

10.4. Sharing in accordance with the law or to protect rights. We may disclose your personal information when required by law, or when necessary to protect our rights or the rights of a third party. Information may also be shared to prevent fraud, violating behavior, or other violations of laws, as well as to comply with legal and regulatory requirements.

10.5. Sharing for the purpose of investigating complaints or legal disputes. The hotel may share information about you for the purpose of investigating complaints or disputes, as well as for the purpose of protecting its rights in any claim, lawsuit or legal proceedings.

10.6. Sharing to prevent harm. In some cases, we may share information to prevent harm to persons or property, when there is a real and immediate need to do so.

10.7. Sharing in cases of a corporate structure change. In the event of a corporate structure change, such as a sale, merger or transfer of assets, we may share your personal information with a third party associated with that process.

10.8. **Sharing anonymous and aggregate information.** We may share anonymous, aggregate or statistical information that does not personally identify you. This information may be used to improve and modify the services and content offered by the hotel or by third parties, as well as for research, marketing or other commercial purposes.

10.9. **Third parties.** Any third party with whom we share or will share your personal information is (and/or will be) obligated by agreement and by law to maintain the privacy and security of your information, and to use it only for the purposes specified. We take reasonable steps to ensure that each third party meets the strict standards of this Privacy Policy and applicable laws.

11. **Information security**

11.1. We attach great importance to protecting the personal information of users of our services - and to this end, the hotel implements advanced systems and procedures for information security. We use secure servers from certified third-party providers, including cloud services, which operate under strict security standards. We also take extra care in the internal classifications of employees who are authorized to access information about you.

11.2. We implement industry-standard security technologies to prevent unauthorized intrusions, maintain user privacy, and protect the personal information entrusted to us. In addition, we review our security procedures from time to time and upgrade security systems as necessary. However, it should be taken into account that no computer system is completely immune, and therefore we cannot absolutely guarantee that information provided to us or stored by us will remain protected from any unauthorized access. We recommend that you exercise discretion and extreme caution when providing details online, especially when clicking on suspicious links.

11.3. In addition to our efforts, the responsibility for securing personal information also applies to the user. We recommend taking the following steps: not providing identification information to unauthorized parties, using antivirus software and protection measures for the end device, such as strong passwords or biometric identification, and checking the accuracy of the information provided to the company.

12. **Duration of information retention**

12.1. We work to ensure that the information in our possession is kept accurate, complete and up-to-date, in accordance with the purposes for which it was collected and in accordance with the provisions of this Privacy Policy. We will retain your personal information for the period necessary to fulfill the purposes set out in this policy, unless longer retention is required or permitted by law.

12.2. Information necessary for the management of our business activities, such as documentation of actions you have taken in connection with our services, or for the purpose of continuing to provide services in the future, will be retained in accordance with applicable legal provisions and according to the needs of the hotel, while maintaining privacy and information security principles.

13. Your rights regarding your personal information

By law, you are entitled to review your personal information held in the hotel's databases, as well as request its correction or deletion if you find that the information is incorrect, incomplete, unclear, or up-to-date.

14. Right to review personal information

14.1. Every person has the right to review the personal information about them held in our databases. A request for inspection may be made directly by you, by an attorney authorized in writing, or by your guardian. We will make the information available for your review in Hebrew, Arabic or English, according to your request.

14.2. In some cases, the hotel may refuse to provide medical or mental health information if there is a concern that providing it could cause serious harm to your health or endanger your life. In such a situation, the information will be provided to the doctor or psychologist of your choice.

15. Right to correct personal information

If you have reviewed your personal information and found it to be inaccurate, incomplete, unclear or not up-to-date, you may contact us to request that the information be corrected or deleted. If we grant your request, we will update the information in our database and will also notify third parties who received the information from us during the relevant period. In the event of a refusal to correct or delete the information, we will inform you and remain at your disposal for further clarifications.

16. Submitting requests for review and correction

You may submit a request to review, correct, or delete information by writing to the email address:_____. We will do our best to respond to your request as soon as possible, in accordance with the provisions of the law.

17. Sharing information with third parties

As stated in this policy, the hotel may share personal information with third parties for the purpose of providing the services. If your request for update or deletion concerns information that has already been transferred to third parties, the hotel will inform you and

refer you to the relevant party for further processing, subject to the terms of that third party.

18. **Handling of information originating from the European Economic Area (EEA)**

In the course of our normal operations, we do not intend to routinely collect personal information from the European Economic Area (EEA). However, there may be cases in which this type of information will be transferred to Israel as part of the use of our services by users or business partners in Europe. To the extent that personal information is transferred as stated, its processing will be carried out in accordance with the Privacy Protection Regulations (Directives Concerning Information Transferred to Israel from the EEA), 5783–2023, and while adhering to strict privacy and information security principles, as set forth hereafter:

18.1. Management and deletion of unnecessary information. We ensure that information that is not necessary for the purposes for which it was collected is deleted or made anonymous. These processes are carried out using technological and organizational mechanisms aimed at ensuring that information that is no longer relevant to the purposes of the processing is not retained, in accordance with the timelines set in the law.

18.2. Maintaining the accuracy and up-to-dateness of information. The hotel works proactively to ensure that the personal information in its databases is accurate, complete and up-to-date. We use control processes and systems that alert us to data that needs updating or correction.

19. **Change in the privacy policy**

We may change the terms of this Privacy Policy from time to time. If we make a material change, we will provide an explicit notice on the website's home page. In any case, we recommend that you periodically reviewing this privacy policy.

20. **Application**

This privacy policy will be governed by the laws of the State of Israel and only the competent courts in the Tel Aviv-Yafo district will have exclusive jurisdiction in connection with this policy.

21. **Contact us**

In any case of a question and/or request, you can contact us via email: _____