FRIENDS PROGRAMME

I. GENERAL TERMS AND CONDITIONS

1. General

Membership and associated benefits of Penta Hotels' loyalty programme ("Friends Programme" or "Friends") are offered by Penta Hotels Worldwide GmbH, Mayfarthstraße 1519 in 60314 Frankfurt am Main, Germany, acting on behalf of its managed hotel operations of the Penta Hotels chain ("Penta Hotels"). The aim is to provide registered members (each referred to as "Friend" or "Member") with the benefits described below for the purpose of encouraging customer loyalty, advertising Penta Hotels' services and market-based evaluation of customer behaviour. Membership is free, but Members agree to the use of the data provided by them for the duration of their membership. The Friends Programme includes all hotels featured on www.pentahotels.com, except for Pentahotels in China. Additional hotels may be added or hotels be removed at Penta Hotels' discretion.

2. Friends membership

2.1 Conditions of participation

Membership as a Friend is available to individuals. Companies or other legal entities are not admitted registering for a Friends account. You can only register as a Friend if you are at least 18 years of age or if you are of legal age according to the legislation of your country of residence; the Friends Programme is not available to minors. There is no legal entitlement to membership in Friends. Penta Hotels' employees are exempted from membership access.

Membership in Friends and/or the benefits thereof are personal and cannot be transferred to other persons.

2.2 Membership registration

Registration for the personal Member account is free and must be done online by completing the registration form on the Penta Hotels homepage at www.pentahotels.com. When using the online booking process at www.pentahotels.com the automatic registration with Friends is subject to explicit consent. Members must have a valid email address in order to sign up for the programme.

It is not possible for different Members to register with the same email address. When registering, all mandatory fields must be completed fully and truthfully.

After submitting the information required for registration, the future Member will receive an invitation e-mail at the address used for registration. The invitation email contains a link that the prospective Member shall click to begin the membership and set a password. Without confirmation of the registration by clicking on the specified link, the membership will not be activated.

The Member may not share his or her password with any other party. The Member is responsible for all transactions in his or her account.

Benefits of membership in Friends are only valid for future hotel stays of the Member and other services, but not retroactively for the time before membership is established.

2.3 Member account

Friends' member accounts are accessible through the Penta Hotels website. Members are asked to keep their personal information up to date. Changes to postal addresses, the Member's name or other relevant membership information must be made by the Member directly in the personal details section of their Friends account. Penta Hotels accept no responsibility for personal data that the Member has entered incorrectly in his/her account.

Members who have changed their name after registering for Friends may be required to provide official documents as proof of the change.

Online access to the Member account may be suspended for maintenance or to improve the website for a reasonable period of time.

2.4 Termination of membership

Penta Hotels reserves the right to terminate a Friends membership for good reason, which may include (list is not exhaustive):

a. Violation of these terms and conditions by the Member
b. False information or abuse of this programme by the Member
c. Violations by the Member of national, state or local laws or regulations in connection with the use of membership rights
d. Non-payment of hotel bills
e. Fraud or abuse related to any part of this programme by the Member
f. Withdrawal of consent to data processing

The Member is entitled to end participation in Friends at any time via email to e-commerce@pentahotels.com.

Termination of membership shall be notified to the Member in written form. Unless set out otherwise, the membership, same as the related relationship between Penta Hotels and the Member, will end permanently on the third day from the date of notification. Upon termination of membership, all personal data concerning the Member will be deleted from the Friends database.

3. Friends special rates

To book a special Friends rate (10% discount), you need to log in or register with Friends and book directly through the Penta Hotels official website or by calling or emailing the hotel directly or through the Penta Hotels reservation office. If you book directly at the hotel or through our reservation centres, the Member must identify him/herself at the time of booking as a Member using the email address they used to register with Friends. The special Friends rate cannot be combined with other special rates or negotiated rates and is valid for bookings made after 1 October 2019. A Friend can book a maximum of one room at the Friends special rate and must occupy the room him/herself. Penta Hotels may at any time terminate or change the offer of the Friends special fares.

4. Other advantages for members

Members benefit from advantages communicated on the Penta Hotels website if the reservation was made directly on the Penta Hotels website, by calling the Penta Hotels' reservations department or directly at the hotel. Except for the special Friends rate (10% discount), Members can also claim the Friends benefits when making reservations through external programmes, third parties or at other negotiated rates. To benefit from the advantages, Members must identify themselves as a Friend to service personnel at the hotel, by communicating the email address associated to their membership. In specific instances, Members may be asked to also confirm and prove their name. The benefits cannot be combined with other discounts.

5. Communication

Members can access all information about their membership in their Friends account. Each Friend accepts the receipt of electronic messages about the programme in relation to his or her membership (e.g. programme update emails).

6. Modification and discontinuation of the Friends membership programme

Penta Hotels reserves the right to restrict, suspend, discontinue, terminate or replace the Friends programme, subject to a 60 days' prior written notice to all Members.

7. Miscellaneous

7.1 Changes to the General Terms and Conditions

Penta Hotels reserves the right to change, restrict or modify these terms and conditions at any time. Friends benefits may be changed, restricted and modified at Penta Hotels discretion at any time, subject only to publication of the replacing benefits reasonably in advance.

7.2 Place of jurisdiction

The terms and conditions of the programme are governed by German law, without prejudice to the mandatory consumer protection provisions that may apply in the Member's country of residence. In the case of deviations between the German and the English version of the General Terms and Conditions, the German version shall prevail.

7.3 Data protection

By registering with Friends, Members expressly agree and consent to the processing of their personal data in the registration form by Penta Hotels in its capacity as data controller, to the extent that this is required for the execution of the Friends membership programme, as well as for the regular transmission of information about Friends, and that this information may be shared with third parties worldwide for the processing of the Member's personal information on our behalf if required by law or in the EU, and in the event of a restructuring, merger or acquisition of a company for the management of Member data, guest services, advertising, marketing and communication purposes.

The Member can revoke his or her consent at any time via the following address. The revocation automatically terminates the Friends membership.

Penta Hotels Worldwide GmbH
Mayfarthstraße 15-19
60314 Frankfurt am Main
Tel.: +49 (0)69 256699 0
Email: e-commerce@pentahotels.com

For more information on how we process your data, please refer to the following Friends Privacy Policy.

II. PRIVACY POLICY

This is an overview of your data collected and processed by Penta Hotel Worldwide GmbH, Mayfarthstr. 15-16, 60314 Frankfurt am Main ("Penta Hotels") in connection with membership of our Friends programme. We also inform you about your rights regarding our data processing. This notification is in addition to our general privacy policy for guests, which can be found at https://www.pentahotels.com/privacy-policy.

1. Information we collect about you

We collect and process the following personal information about you in connection with your Friends membership.

***Non-sensitive data*:**

a. Your personal data ► including name, date of birth, language and country of residence;
b. Your contact details ► including your e-mail address;
c. Booking details ► including which hotels and information about a stay in one of our hotels for which you have used your Friends membership; the vehicle registration number of your car, if this was necessary for managing your stay

Sensitive data:

We do not process any data related to race and ethnic origin, political opinions, religious or ideological convictions or union membership, genetic data, biometric data for the unique identification of a natural person, health information or details about sex life or sexual orientation.

However, if you provide us with specific categories of data for your booking (e.g. asking for accessibility for physical disabilities, or informing us about religious dietary requirements), we will collect and process that information in accordance with its purpose and based on your express or implied consent.

2. On what legal basis do we use your personal information?

a. Fulfilment of a contract (Section 6 (1) (b) GDPR): Your personal information will be processed to manage your membership and to provide the associated benefits.
b. Consent (Section 6 (1) (a) GDPR): The sending of newsletters is only possible following your prior consent. You may unsubscribe from the newsletter at any time by clicking the unsubscribe link in previous newsletters or by contacting us at ecommerce@pentahotels.com If you provide us with special categories of data for your booking, we also understand that as express consent to the processing of this data in order for us to provide our services according to your wishes.

3. Why do we collect your personal information and how do we justify its use?

We may use your personal information to:

a. Manage your Friends membership;
b. Manage your data;
c. Provide and improve services and to personalise offers and services, to provide Members with the benefits described for the purpose of encouraging customer loyalty, advertising our services and market-based evaluation of customer behaviour.

4. From whom do we receive your personal data?

We will only receive your personal information directly from you and may use it in conjunction with data from your previous bookings and stays at our hotels.

5. Who do we share your personal information with?

We share information with our group companies that operate individual Penta hotels and are managed by Penta Hotels Worldwide GmbH (for a list of these group companies, see Appendix 1 of these General Terms and Conditions).

We use third parties as order processors to operate our website and booking platform or to provide similar services. These third parties will receive your personal data only as a processor on our behalf and as instructed by us. They are not permitted to use the data for their own purposes. For more information on the exchange of data, please read our general privacy policy, which can be found at https://www.pentahotels.com/privacy-policy

6. Do we send your personal data abroad and what security measures apply?

In general, we do not share your information with any recipient outside of Europe or in countries whose level of data protection is not considered appropriate. For more information on the sending of personal data abroad, please read our general privacy policy, which can be found at https://www.pentahotels.com/privacy-policy

7. For how long do we save your data?

We store your data for no longer than is necessary for the purpose for which we received it, and for any other legitimate, related purpose. In order to manage your Friend benefits, we retain the data for the duration of your membership and after its termination for as long as the statutory retention requirements require.

8. Updating your personal information

We will ensure that your personal information is accurate. To assist us, you may change your personal information by logging into your membership account at www.pentahotels.com or by sending us any changes to the personal information that you have provided us with by email: e-commerce@pentahotels.com.

9. What are your rights regarding your data?

Under applicable law and regulations, you may, at any time, exercise certain rights, including the following.

9.1. Access

The right to request access to your personal data, which includes the right to obtain confirmation from us as to whether personal data concerning you is being processed, and where that is the case, access to the personal data and information related to how it is processed.

9.2. Rectify or erase

The right to rectification or erasure of your personal data, which includes the right to have incomplete personal data completed.

9.3. Restrict

The right to obtain a restriction of processing concerning your personal data, which includes restricting us from continuing to process your personal data under certain circumstances (e.g., where you contest the accuracy of your personal data, for a period enabling us to verify the accuracy of the personal data).

9.4. Object

The right to object to the processing of your personal data under certain circumstances, including objecting to processing your personal data for direct marketing purposes, or objecting to processing your personal data when it is done based upon legitimate interests.

9.5. Data portability.

The right to data portability, which includes certain rights to have your personal data transmitted from us to you or another controller.

9.6. Consent

Where we process your personal data based on your consent, the right to withdraw consent at any time with effect for the future. Any requests related to the above rights may be made by contacting us as set forth in **Section 12.**

9.7. Complaint

In some jurisdictions, you may also have the right to lodge a complaint with a supervisory authority.

10. Privacy rights for residents of the Russian Federation:

In accordance with Russian Federal Law "On Personal Data" No. 152-FZ we collect, record, systematize, accumulate, store, update (renew and modify), and extract personal data about Russian citizens using databases located in the territory of the Russian Federation. As information containing personal data may be transmitted from the Russian Federation to countries that ensure an adequate level of protection for personal data, including member states of the European Union and other countries which Russian law recognizes as ensuring adequate to protection, we duplicate personal data of residents of the Russian Federation on our systems as required to deliver the requested services. By submitting information to us on our Services, submitting membership forms to us or making reservations, you grant us consent to process your personal data.

11. Privacy rights for California residents.

Under California Civil Code section 1798.83, California residents who have an established business relationship with us are entitled to ask us for a notice describing the types of personal customer information we have shared with third parties for those parties' direct marketing purposes during the preceding calendar year. That notice will identify the categories of information shared with third parties, the names and addresses of those third parties, and examples of the types of services or products marketed by those third parties. If you are a California resident and would like to request a copy of this notice, please submit a written request to Penta Hotels Worldwide GmbH, Mayfarthstrasse 15 – 19, 60314 Frankfurt am Main, Germany, Attn: Data Protection Officer. Also note that, if you exercise your right to cancel, revoke consent, and/or restrict, we need to delete your Friends user account and your Friends membership, and the associated benefits will end. If this is the case, we will inform you.

12. Your contact for enquiries

If you have any questions about the use of your personal information or wish to exercise your rights as a data subject, please contact:

Penta Hotels Worldwide GmbH
Mayfarthstraße 15-19
60314 Frankfurt am Main
Tel.: +49 (0)69 259966 0
Email: privacy@pentahotels.com

13. Responsible data protection supervisory authority:

For Penta Hotels Worldwide GmbH:
The Hessian Commissioner for Data Protection and Freedom of Information, GustavStresemann-Ring 1, 65189 Wiesbaden

III. APPENDIX

List of companies that operate individual Penta Hotels, and are managed by Penta Hotels Worldwide GmbH.

- CFH Hotels Germany GmbH, c/o Pentahotel Braunschweig, Office Sachsendamm 4/5, 10829 Berlin Germany
- CFH Hotels Germany GmbH, c/o Pentahotel Eisenach, Office Sachsendamm 4/5, 10829 Berlin Germany
- CFH Hotels Germany GmbH, c/o Pentahotel Kassel, Office Sachsendamm 4/5, 10829 Berlin Germany
- HPI Germany Hotelbesitz GmbH, c/o Pentahotel Rostock, Schwaansche Straße 6, 18055 Rostock, Germany
- CFH Hotels Germany GmbH, c/o Pentahotel Leipzig, Office Sachsendamm 4/5, 10829 Berlin Germany
- CFH Hotels Germany GmbH, c/o Pentahotel Wiesbaden, Abraham Lincoln Strasse 17, 65189 Wiesbaden, Germany
- Antares Belgium Property SA, c/o Pentahotel Brussels Airport, Berkenlaan 5, 1831 Diegem, Belgium
- Antares Belgium Property SA, c/o Pentahotel Liege, Berkenlaan 5, Boulevard de la Sauvenière 100, 4000 Liège, Belgium
- Antares Belgium Property SA, c/o Pentahotel Brussels City Center, Chaussee de Charleroi 38-40, 1060 Brussels, Belgium
- Antares Belgium Property SA, c/o Pentahotel Leuven, Alfons Smetsplein 7, 3000 Leuven, Belgium
- Hotel Property Investors U.K. Ltd, c/o Pentahotel Reading, Oxford Road, Reading RG1 7RH, United Kingdom
- ARBAT HOSPITALITY LLC, Room 1, office 1, floor 1, 15 Novy Arbat Street, 119019 Moscow, Russia
- CFH Penta France SAS, pentahotels Paris Charles de Gaulle Airport, 12 Allée du Verger, 95700 Roissy-en-France, France