Cookie Policy

Updated: December 2021

This Cookie Policy explains how Hugo's Group (the "**Group**", "**We**", "**Our**", or "**Us**"), a Malta-based group of companies which operates in the hospitality industry and provides the Services (as defined in the Group's <u>General Privacy Policy</u>), uses cookies when you visit our websites listed below (the "**Websites**"):

- www.hugoshotels.com
- www.hugosterrace.com
- www.hugosburgerbar.com.
- www.baccobyhugos.com
- http://www.hugospizzapasta.com/

For a description of the Group and its operations, please refer to the Group's General Privacy Policy.

What are Cookies?

Cookies are files with small amounts of data which the web server hosting the Websites sends to your browser and stores on your computer or mobile device. These cookies enable the web server to recognise your browser's session. A cookie cannot read data off your device or read cookie files created by web servers hosting other websites. Insofar as they may be used to identify an individual, cookie IDs and the data cookies collect may be considered as Personal Data under the European Union's General Data Protection Regulation [EU] 2016/679 (the "GDPR") and the Data Protection Act (Chapter 586 of the Laws of Malta) (together, the GDPR and the Act shall be referred to as the "Data Protection Laws").

Cookies set by the Group, as the operator of the Websites, are called "first party cookies", whilst cookies set by parties other than the Group are called "third party cookies". We do not control the types of information processed by these third party cookies. We encourage you to check the relevant third party's website for more information on the manner in which they use cookies.

You can learn more about cookies and their functions generally by visiting an information website such as <u>allaboutcookies.org</u>.

How and why do we use Cookies?

When you visit any one of our Websites, cookies may be placed on your device for one or some of the following purposes:

- To ensure the security of our Websites;
- To ensure the efficient and smooth functioning of our Websites;
- To recognise you as a previous Website user and provide you with a personalised experience on our Websites;
- To process reservations at our business establishments which are booked on our Websites;
- To provide you with assistance through the chat function on our Websites;
- To market our business establishments and our Services;
- To gather statistics related to our Websites and analyse your experience on our Websites; and

To improve upon our Websites, our marketing strategies and our Services.

Kindly refer to Appendix A below for further information on the specific purpose and nature of each cookie deployed via our Websites.

What information is processed through our Cookies?

When you visit any one of our Websites, the cookies listed in Appendix A further below may collect or otherwise process the following information pertaining to you:

- Your name;
- Your email address;
- Your log-in details on our Website;
- The public Internet Protocol (IP) address assigned to your device by your internet service provider;
- Your encrypted session ID;
- The geolocation of the device from which you have visited our Website;
- The number of times you have viewed a page on our Website;
- The manner in which you make use of our Websites;
- Whether you have come across any of our marketing material in your recent online activity prior to visiting our Websites; and
- Your conversations on the chat function on our Websites.

What types of Cookies do we use?

We currently use the below types of cookies on our Websites:

- <u>Strictly necessary cookies</u> These cookies are essential for the user to be able to navigate our Websites and make use of their features.
- <u>Functionality, personalisation or preference cookies</u> These cookies allow our Websites to remember the choices you have made in the past.
- <u>Statistics or performance cookies</u> These cookies collect information about the manner in which you use our Websites so as to enable us to improve them.
- Marketing or targeting cookies These cookies track your online activity, so as to enable us to deliver more relevant advertising to you.

We shall seek your express consent for the processing of your data by our cookies, except for 'strictly necessary' cookies, through which we may process Personal Data on the basis of our legitimate interests.

How long will Cookies stay on your browsing device?

The cookies placed on our Website have different retention periods. Cookies may be classified as either:

- Session cookies These cookies are temporary and will only remain on your device until you exit our Website on your web browser; or
- Persistent cookies These cookies will remain on your device until their respective expiration date.

Please refer to Appendix A below for the retention periods of the cookies on our Websites.

How can you manage Cookies?

Some cookies will automatically be turned on when you visit our Websites, and you cannot turn them off unless you change your browser settings. This is however limited to those cookies which are strictly necessary.

Our Websites also use functionality, personalisation and preference cookies; statistics or performance cookies; and marketing or targeting cookies, so as to make your time and experience more enjoyable. We will only use these cookies if you would have agreed to their prior use when visiting our Websites. You are free to switch these cookies on and off at any time, as you please.

Please be aware that, as mentioned earlier, third parties may set up third party cookies on our Websites to allow interaction with other websites. We have no control over the placing of such cookies on your device by said third parties, so we suggest that you check their privacy notices to better understand how they are using cookies and how you can manage them. These cookies may be turned off, but not through us.

You may choose which cookies you would like to turn on or off from the cookie banner which pops-up on our homepage as soon as you visit our Websites.

Should you wish to change your cookies settings directly from your device, please follow the instructions provided in the links below depending on your browser:

Chrome: https://support.google.com/chrome/answer/95647?hl=en-GB

Safari: https://support.apple.com/en-gb/guide/safari/sfri11471/mac

Internet Explorer: https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-

<u>cookies</u>

Firefox: https://support.mozilla.org/en-US/kb/how-do-i-turn-do-not-track-feature

Opera: https://help.opera.com/en/latest/web-preferences/#cookies

However, should you choose to disable or refuse all cookies, our Websites or some parts of our Websites may not function in the intended manner and your experience thereon may be significantly diminished. We therefore do not recommend turning cookies off when using our Websites for these reasons.

Changes to our Cookie Policy

We may update this Cookie Notice from time to time. Any changes become effective upon the posting of the revised Cookie Notice on our website. We will seek your express consent to any changes to our cookie practices if so required by law. Otherwise, use of this website following such changes constitutes your acceptance of the revised Cookie Notice. Please refer back to this page every so often to stay updated.

Contact Us

Should you require any further information regarding the data processed through our cookies, or our cookie practices generally, you may contact us on the below contact details. Any request for information must be made in writing and must also include your name, address, email address and a description of the information required. We may also ask for identification documentation, which is essential in order for us to be able to verify your identity.

Postal address:	2, St George's Court A, St Augustine Street, St

Julian's, Malta

Tel. number: +356 2016 2400

Email address: dataprotection@hugosmalta.com

Appendix A

Cookie Table

Name	Provider	First Party or Third Party Cookie	Purpose		
www.hugoshotels.com					
_hjAbsoluteSessionInProgress	www.hugoshotels.com	First party cookie	To track the beginning of your session		
			as to count the number of times you		
			visited the Website.		

_hjSessionUser_1811262	www.hugoshotels.com	First party cookie	To assist in the formulation of state
			relating to the Website.
_ga_NK1N1X24X9	www.hugoshotels.com	First party cookie	To track the number of times you
			visited a page on our Website.
cookielawinfo-checkbox-necessary	www.hugoshotels.com	First party cookie	To read whether cookies can be place
			your device.
cookielawinfo-checkbox-non-	www.hugoshotels.com	First party cookie	To read whether cookies can be place
necessary			your device.
thn_id	www.hotelsnetwork.com	Third party cookie	To recognise you as a user of our We
			and to analyse your experience on
			Website.
www.hugosterrace.com			
PHPSESSID	www.hugosterrace.com	First party cookie	To assist with the User's session or
			Website, such as to maintain a logg
			status for a User between page visits.
loftloader_pro_homepage_once_pe r_session_visited	www.hugosterrace.com	First party cookie	To assist with preload functionality o
			Website.
www.hugosburgerbar.com.			
PHPSESSID	www.hugosburger.com	First party cookie	To assist with the User's session or
			Website, such as to maintain a logg
			status for a User between page visits.
uQVkOgfT	www.hugosburger.com	First party cookie	-
AcmvNbukSFwsVeH	www.hugosburger.com	First party cookie	-
loftloader_pro_homepage_once_pe r_session_visited	www.hugosburger.com	First party cookie	To assist with preload functionality o
			Website.
dWuiwCZeb	www.hugosburger.com	First party cookie	-
4.1.4.11.0.200		The party cooms	
www.baccobyhugos.com			
PHPSESSID	www.baccobyhugos.com	First party cookie	To assist with the User's session of
			Website, such as to maintain a logg
			status for a User between page visits.
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loftloader_pro_homepage_once_pe r_session_visited	www.baccobyhugos.com	First party cookie	To assist with preload functionality o Website.		
http://www.hugospizzapasta.com/					
PHPSESSID	www.hugospizzapasta.com	First party cookie	To assist with the User's session of Website, such as to maintain a logg status for a User between page visits.		
loftloader_pro_homepage_once_pe r_session_visited	www.hugospizzapasta.com	First party cookie	To assist with preload functionality o Website.		