

KENNEDY / 89

FRANKFURT

Data protection information according to Art. 13 EU General Data Protection Regulation (GDPR) for guests

In accordance with Article 13 of the General Data Protection Regulation (GDPR), we would like to inform you about the processing of your personal data in the context of events and hotel bookings. Data processing also takes place in accordance with the Hyatt Privacy Policy available at: <https://www.hyatt.com/de-DE/info/privacy-policy>

Data Controller

SIC Hospitality GmbH
KENNEDY 89
Stresemannallee 28, 60596 Frankfurt am Main
Phone: +49 69 / 2562 1234
Email: info@kennedy-89.com

Data protection officer

You can contact our data protection officer at:

Gesellschaft für Personaldienstleistungen mbH
Phone: +49 561 78968-80
Email: datenschutz@gfp24.de
Address: Pestalozzistraße 27, 34119 Kassel

Purposes and legal bases of processing

Data processing primarily takes place for the purpose of organising events and handling bookings at our hotel – Kennedy 89 – Part of the Unbound Collection by Hyatt. We process your personal data in accordance with the EU General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG), and all other applicable laws.

Personal data is processed as follows in compliance with these provisions:

a. Performance of contractual obligations (Art. 6(1)(b) GDPR)

Data are processed for the initiation and performance of contracts (e.g., organisation of events/meetings at the hotel, hotel room bookings or visit our restaurant or bar).

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b. Based on legitimate interests (Art. 6(1)(f) GDPR)

Where necessary, we process your data beyond contractual fulfilment to protect our legitimate interests, for example:

- Establishment, exercise, or defence of legal claims,
- Prevention and investigation of criminal offences or serious breaches of duty,
- Measures to ensure building and facility security (e.g., access controls),
- Measures to protect our property rights (e.g., video surveillance),
- Improvement of service quality and customer satisfaction.

c. Based on your consent (Art. 6(1)(a) GDPR)

If you have given us your consent to process personal data for specific purposes, the lawfulness of such processing is based on your consent. You may withdraw your consent at any time with effect for the future. Past processing remains unaffected by the withdrawal.

d. Compliance with legal obligations (Art. 6(1)(c) GDPR) or performance of a task carried out in the public interest (Art. 6(1)(e) GDPR).

As a company, we are subject to various legal obligations. These include, among others, compliance with statutory reporting and documentation duties and identity verification requirements.

Categories and sources of personal data: We process the following categories of personal data:

- Name, gender, private and/or business contact details, business title, date and place of birth, passport photo, nationality, as well as ID and visa data;
- Information about your stay, arrival and departure dates, goods and services used, special requests, notes on your service preferences (including room and travel preferences), dialled telephone numbers, emails, and received fax, text, or phone messages;
- If applicable: credit card details, payment method information, bank account details, membership information concerning Hyatt loyalty programmes or frequent traveller programmes;
- Any necessary information required to fulfil special requests;
- Information collected at a Hyatt location through surveillance cameras, internet systems (including wired and wireless networks collecting data from your computer, smartphone, mobile device or your location), key card systems, and other technology systems;
- Contact details and other relevant information of employees of corporate clients, suppliers, or other business partners (e.g., travel agencies, conference and event planners).

Most of this data is provided to us directly by our business partners and corporate clients via email, fax, or telephone requests. If you submit a booking request via the Hyatt website (www.hyatt.com), Hyatt transmits your data to us.

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Categories of recipients of personal data: Within the scope of our business relationship, it may be necessary to transfer personal data to the Hyatt Group. A detailed list of potential recipients within the Hyatt Group is available in the Hyatt Privacy Policy at <https://www.hyatt.com/de-DE/info/privacy-policy>.

Please note that this may include data transfers to servers in the United States operated by Hyatt. The protection of your data is ensured through appropriate safeguards in accordance with GDPR requirements (see below). Data may also be transferred to service providers bound by data protection obligations or where required by law.

Transfer of personal data to a third country: Data transfers to third countries only occur in accordance with legal requirements (e.g., based on an adequacy decision of the European Commission pursuant to Art. 45(1) GDPR for the EU-US Data Privacy Framework, or pursuant to Art. 44 et seq. GDPR based on appropriate safeguards such as EU Standard Contractual Clauses).

Duration of storage: We use and store your personal data for as long as necessary to fulfil the purpose for which they are processed and in accordance with our statutory and regulatory obligations.

To improve our service offering, we store your contact details and stay information for up to 6 years after your last stay. You may object to this storage at any time.

Rights of the data subject: You have the right at any time to request information about the personal data we store concerning you, as well as rectification, restriction of processing or deletion of your data. If statutory, contractual, or fiscal retention obligations or other legal requirements prevent deletion, your data will be restricted instead. The same applies in the event of an objection. You also have the right to data portability in a structured, commonly used format.

Right to withdraw consent: If you have provided consent, you may withdraw it at any time with effect for the future. Please direct your withdrawal to:

SIC Hospitality GmbH
KENNEDY 89
Stresemannallee 28, 60596 Frankfurt am Main
Phone: +49 69 2562 1234
Email: info@kennedy-89.com

Right to object: You have the right to object at any time, on grounds relating to your situation, to the processing of your personal data carried out based on Article 6(1)(e) GDPR (processing in the public interest) or Article 6(1)(f) GDPR (processing based on legitimate interests).

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or for the establishment, exercise, or defence of legal claims.

Right to lodge a complaint with a supervisory authority: Pursuant to Article 77 GDPR, you have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data is unlawful. The competent authority for our company is:

The Hessian Commissioner for Data Protection and Freedom of Information represented by Dr. Alexander Roßnagel, Address: Gustav-Stresemann-Ring 1, 65189 Wiesbaden, Phone: +49 611 1408 0 Email: poststelle@datenschutz.hessen.de

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Provision of data: The provision of personal data is contractually required or necessary for the conclusion of a contract, as we cannot ensure the proper execution of events and/or hotel bookings without this information.

Data protection information according to Art. 13 of the EU General Data Protection Regulation (GDPR) regarding the use of Wi-Fi

We provide you with access to the Internet in the form of free Wi-Fi access ("guest Wi-Fi") in our business premises. In the following, we inform you about the personal data collected in this context.

Processing purposes and legal basis: When using our guest Wi-Fi, only such personal or device-related data are processed as are strictly necessary for the technical provision, authentication, and security of the internet access. This includes in particular:

- the MAC address of your device (usually randomised by the operating system),
- the IP address assigned to your device,
- the authentication method used (e.g. captive portal, PMS validation, or Passpoint profile),
- log data relating to successful and failed authentication attempts,
- session data such as the start and end of the connection, assignment to the access point, session duration, transmitted data volumes (bytes in/out), and protocol types used.

If you access the internet via Passpoint, the following technically required identifiers are additionally processed:

- the current (usually randomised) MAC address,
- a pseudonymous identifier (CUI – Chargeable User Identity) derived as a hash value from the Passpoint profile,
- a network or location identifier (NAS identifier) identifying the respective network access point (e.g. hotel location).

No evaluation of browser histories, visited websites, communication content, or deep packet inspection is carried out. No personal data are collected beyond the information you expressly provide as part of the authentication process (e.g. room number during PMS login or a loyalty identifier when using Passpoint).

The data are provided directly by our guests during the registration for and use of the guest Wi-Fi or are generated automatically for technical reasons.

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Recipients: We do not share your personal data with third parties. Your data will only be passed on or transmitted if it is necessary for the execution of the contract, if it is based on a legal basis, if there is a legitimate interest or based on your prior consent.

If external service providers support us in the processing of your data (e.g. IT service providers), this is done within the framework of order processing in accordance with Art. 28 GDPR. In doing so, we only conclude appropriate contracts with service providers that offer sufficient guarantees that appropriate technical and organizational measures ensure the protection of your data.

Data transfer to a third country: A transfer of data to third countries does not take place and is not intended.

Duration of storage: The duration of storage is determined by the purpose of the respective data processing activity and by statutory requirements:

- Operational and error logs are generally stored for 24 to 72 hours and are then automatically deleted, unless there is a statutory obligation to retain them for a longer period.
- Access and authentication logs (in particular MAC address, IP address, and the start and end of the session) are regularly stored for a period of up to 30 days and are subsequently deleted automatically.
- Passpoint session data are stored for the duration of the respective session and for up to 24 hours after the end of the session in order to ensure proper provision of the service and to enable error analysis.
- Passpoint profile data, insofar as such data are processed (e.g., name and email address of guests without a World of Hyatt membership), are deleted once the profile is removed from the end device or, at the latest, after 12 months of inactivity.
- Authentication logs (e.g., RADIUS logs) are stored for a period of up to 3 months, unless different statutory retention obligations apply.

Data will only be stored for a longer period where this is required by law or is necessary for the establishment, exercise, or defense of legal claims.

Provision of data: The provision of personal data about the data subject is technically necessary for the use of the Wi-Fi. Without this data, you will not be able to use our Wi-Fi.

Status: 01/2026

Please note that this English version is provided for your convenience only. The original German text is the authoritative and legally binding version. While we have made efforts to accurately translate the content, there may be discrepancies or inaccuracies. In case of any inconsistency between the German and English versions, the German version (www.sic.berlin/hospitality) shall prevail.