

# Legal Notice

Information in accordance with the duty to inform pursuant to §5 of the E-Commerce Act, §14 of the Austrian Commercial Code, §63 of the Industrial Code and the duty to disclose pursuant to §25 of the Media Act.

APT GmbH  
Himmelreich 6,  
5020 Salzburg,  
Österreich

**Object of the company:** Hotel / Beherbung

**VAT-Number:** ATU 71447927

**GLN:** 9110023942865

**GISA:** 33689739

**Corporate register number:** FN 459648 d

**Corporate register court:** Salzburg

**Company location:** 5020 Salzburg

**Phone:** +43 664 1336812

**Fax:** –

**Email:** [hello@apt-apartments.com](mailto:hello@apt-apartments.com)

**Member of:** Wirtschaftskammer Salzburg, Sparte Tourismus und Freizeitwirtschaft

**Laws re. professions:** Gewerbeordnung: [www.ris.bka.gv.at](http://www.ris.bka.gv.at)

**Supervisory/Trade authority:** Landesgericht Salzburg

**Job title:** Hotel / Beherbung

**Awarding country:** Österreich

## Chief executive

Sascha Hochbein

## Ownership structure

Geschäftsführer

Hochbein Sascha

Privatperson

alleinvertretungsberechtigt

Gesellschafter

Hochbein Hans-Jürgen

Privatperson

Anteil: 5,00%

Gesellschafter

Hochbein Sascha

Privatperson

Anteil: 5,00%

Gesellschafter

Firma APT Holding GmbH

Ges.m.b.H.

Anteil: 90,00%

### **Contact details of the data protection controller**

If you have any question about data protection, please find the contact details of the body or person responsible for data protection below:

APT GmbH

Steingasse 59

5020 Salzburg

Authorised to represent: Sascha Hochbein

E-Mail: [hello@apt-apartments.com](mailto:hello@apt-apartments.com)

Phone: +43 664 1336812

Company details: <https://apt-apartments.com/impressum/>

## **EU Dispute Resolution**

We would like to inform you about the Online Dispute Resolution platform (ODR platform) in accordance with the regulation on Online Dispute Resolution in consumer matters (ODR Regulation).

Consumers have the option of submitting complaints to the European Commission's Online Dispute Resolution platform at

<https://ec.europa.eu/consumers/odr/main/?event=main.home2.show>. You will find the necessary contact details in our imprint above.

However, we would like to note, that we are not willing or obliged to participate in dispute settlement procedures before a consumer arbitration board.

## **Liability for the Contents of this Website**

We are constantly developing the content of this website and strive to provide correct and up-to-date information. Unfortunately, we cannot accept liability for the accuracy of any content on this website. This especially includes content provided by third parties. As a service provider, we are neither obliged to monitor any information you transmit or store, nor to investigate any circumstances that indicate illegal activity.

Due to court- or official orders under the general law, our obligations to remove information or to block the use of information remain unaffected, even if we are not responsible.

If you notice any problematic or illegal content, please contact us immediately so we can remove the illegal content. You will find our contact details in the imprint.

## Liability for Links on this Website

Our website contains links to other websites for which we are not responsible. We are not liable for any linked websites, since we have had no knowledge of illegal activities. If we ever become aware of any illegal activity, we will remove any links in question immediately.

If you notice illegal links on our website, please contact us. You will find our contact details in the imprint.

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APT GmbH

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## Privacy Policy

### Privacy Policy Introduction and Overview

We have written this privacy policy (version 14.01.2023-122394158) in order to explain to you, in accordance with the provisions of the [General Data Protection Regulation \(EU\) 2016/679](#) and applicable national laws, which personal data (data for short) we as the controller – and the processors commissioned by us (e.g. providers) – process, will process in the future and what legal options you have. The terms used are to be considered gender-neutral.

**In short:** We provide you with comprehensive information about any of your personal data we process.

Privacy policies usually sound very technical and use legal terminology. However, this privacy policy is intended to describe the most important things to you as simply and transparently as possible. So long as it aids transparency, technical **terms are explained in a reader-friendly manner, links**

to further information are provided and **graphics** are used. We are thus informing in clear and simple language that we only process personal data in the context of our business activities if there is a legal basis for it. This is certainly not possible with brief, unclear and legal-technical statements, as is often standard on the internet when it comes to data protection. I hope you find the following explanations interesting and informative. Maybe you will also find some information that you have not been familiar with.

If you still have questions, we kindly ask you to contact the responsible body named below or in the imprint, follow the existing links and look at further information on third-party sites. You can of course also find our contact details in the imprint.

## Scope

This privacy policy applies to all personal data processed by our company and to all personal data processed by companies commissioned by us (processors). With the term personal data, we refer to information within the meaning of Article 4 No. 1 GDPR, such as the name, email address and postal address of a person. The processing of personal data ensures that we can offer and invoice our services and products, be it online or offline. The scope of this privacy policy includes:

- all online presences (websites, online shops) that we operate
- Social media presences and email communication
- mobile apps for smartphones and other devices

**In short:** This privacy policy applies to all areas in which personal data is processed in a structured manner by the company via the channels mentioned. Should we enter into legal relations with you outside of these channels, we will inform you separately if necessary.

## Legal bases

In the following privacy policy, we provide you with transparent information on the legal principles and regulations, i.e. the legal bases of the General Data Protection Regulation, which enable us to process personal data.

Whenever EU law is concerned, we refer to REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016. You can of course access the General Data Protection Regulation of the EU online at EUR-Lex, the gateway to EU law, at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679>.

We only process your data if at least one of the following conditions applies:

1. **Consent** (Article 6 Paragraph 1 lit. a GDPR): You have given us your consent to process data for a specific purpose. An example would be the storage of data you entered into a contact form.
2. **Contract** (Article 6 Paragraph 1 lit. b GDPR): We process your data in order to fulfill a contract or pre-contractual obligations with you. For example, if we conclude a sales contract with you, we need personal information in advance.
3. **Legal obligation** (Article 6 Paragraph 1 lit. c GDPR): If we are subject to a legal obligation, we will process your data. For example, we are legally required to keep invoices for our

bookkeeping. These usually contain personal data.

4. **Legitimate interests** (Article 6 Paragraph 1 lit. f GDPR): In the case of legitimate interests that do not restrict your basic rights, we reserve the right to process personal data. For example, we have to process certain data in order to be able to operate our website securely and economically. Therefore, the processing is a legitimate interest.

Other conditions such as making recordings in the interest of the public, the exercise of official authority as well as the protection of vital interests do not usually occur with us. Should such a legal basis be relevant, it will be disclosed in the appropriate place.

In addition to the EU regulation, national laws also apply:

- In **Austria** this is the Austrian Data Protection Act (**Datenschutzgesetz**), in short **DSG**.
- In **Germany** this is the Federal Data Protection Act (**Bundesdatenschutzgesetz**), in short **BDSG**.

Should other regional or national laws apply, we will inform you about them in the following sections.

## Contact details of the data protection controller

If you have any questions about data protection, you will find the contact details of the responsible person or controller below:

APT GmbH

Steingasse 59

5020 Salzburg

Authorised to represent: Sascha Hochbein

E-Mail: [hello@apt-apartments.com](mailto:hello@apt-apartments.com)

Phone: [+43 664 1336812](tel:+436641336812)

Company details: <https://apt-apartments.com/impressum/>

## Storage Period

It is a general criterion for us to store personal data only for as long as is absolutely necessary for the provision of our services and products. This means that we delete personal data as soon as any reason for the data processing no longer exists. In some cases, we are legally obliged to keep certain data stored even after the original purpose no longer exists, such as for accounting purposes.

If you want your data to be deleted or if you want to revoke your consent to data processing, the data will be deleted as soon as possible, provided there is no obligation to continue its storage.

We will inform you below about the specific duration of the respective data processing, provided we have further information.

# Rights in accordance with the General Data Protection Regulation

In accordance with Articles 13, 14 of the GDPR, we inform you about the following rights you have to ensure fair and transparent processing of data:

- According to Article 15 DSGVO, you have the right to information about whether we are processing data about you. If this is the case, you have the right to receive a copy of the data and to know the following information:
  - for what purpose we are processing;
  - the categories, i.e. the types of data that are processed;
  - who receives this data and if the data is transferred to third countries, how security can be guaranteed;
  - how long the data will be stored;
  - the existence of the right to rectification, erasure or restriction of processing and the right to object to processing;
  - that you can lodge a complaint with a supervisory authority (links to these authorities can be found below);
  - the origin of the data if we have not collected it from you;
  - Whether profiling is carried out, i.e. whether data is automatically evaluated to arrive at a personal profile of you.
- You have a right to rectification of data according to Article 16 GDPR, which means that we must correct data if you find errors.
- You have the right to erasure (“right to be forgotten”) according to Article 17 GDPR, which specifically means that you may request the deletion of your data.
- According to Article 18 of the GDPR, you have the right to restriction of processing, which means that we may only store the data but not use it further.
- According to Article 20 of the GDPR, you have the right to data portability, which means that we will provide you with your data in a standard format upon request.
- According to Article 21 DSGVO, you have the right to object, which entails a change in processing after enforcement.
  - If the processing of your data is based on Article 6(1)(e) (public interest, exercise of official authority) or Article 6(1)(f) (legitimate interest), you may object to the processing. We will then check as soon as possible whether we can legally comply with this objection.
  - If data is used to conduct direct advertising, you may object to this type of data processing at any time. We may then no longer use your data for direct marketing.
  - If data is used to conduct profiling, you may object to this type of data processing at any time. We may no longer use your data for profiling thereafter.
- According to Article 22 of the GDPR, you may have the right not to be subject to a decision based solely on automated processing (for example, profiling).
- You have the right to lodge a complaint under Article 77 of the GDPR. This means that you can complain to the data protection authority at any time if you believe that the data processing of personal data violates the GDPR.

**In short:** you have rights – do not hesitate to contact the responsible party listed above with us!

If you believe that the processing of your data violates data protection law or your data protection rights have been violated in any other way, you can complain to the supervisory authority. For Austria, this is the data protection authority, whose website can be found at <https://www.dsb.gv.at/>. In Germany, there is a data protection officer for each federal state. For more information, you can contact the Federal Commissioner for [Data Protection and Freedom of Information \(BfDI\)](#). The following local data protection authority is responsible for our company:

## **Austria Data protection authority**

**Manager:** Mag. Dr. Andrea Jelinek

**Address:** Barichgasse 40-42, 1030 Wien

**Phone number.:** +43 1 52 152-0

**E-mail address:** [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

**Website:** <https://www.dsb.gv.at/>

## **Data transfer to third countries**

We only transfer or process data to countries outside the EU (third countries) if you consent to this processing, if this is required by law or if it is contractually necessary. In any case, we generally only do so to the permitted extent. In most cases, your consent is the most important reason for data being processed in third countries. When personal data is being processed in third countries such as the USA, where many software manufacturers offer their services and have their servers located, your personal data may be processed and stored in unexpected ways.

We want to expressly point out, that according to the European Court of Justice, there is currently no adequate level of protection for data transfer to the USA. Data processing by US services (such as Google Analytics) may result in data processing and retention without the data having undergone anonymisation processes. Furthermore, US government authorities may be able to access individual data. The collected data may also get linked to data from other services of the same provider, should you have a user account with the respective provider. We try to use server locations within the EU, whenever this is offered and possible.

We will provide you with more details about data transfer to third countries in the appropriate sections of this privacy policy, whenever applicable.

## **Security of data processing operations**

In order to protect personal data, we have implemented both technical and organisational measures. We encrypt or pseudonymise personal data wherever this is possible. Thus, we make it as difficult as we can for third parties to extract personal information from our data.

Article 25 of the GDPR refers to “data protection by technical design and by data protection-friendly default” which means that both software (e.g. forms) and hardware (e.g. access to server rooms) appropriate safeguards and security measures shall always be placed. If applicable, we will outline

the specific measures below.

## TLS encryption with https

The terms TLS, encryption and https sound very technical, which they are indeed. We use HTTPS (Hypertext Transfer Protocol Secure) to securely transfer data on the Internet.

This means that the entire transmission of all data from your browser to our web server is secured – nobody can “listen in”.

We have thus introduced an additional layer of security and meet privacy requirements through technology design [Article 25 Section 1 GDPR](#)). With the use of TLS (Transport Layer Security), which is an encryption protocol for safe data transfer on the internet, we can ensure the protection of confidential information.

You can recognise the use of this safeguarding tool by the little lock-symbol , which is situated in your browser's top left corner in the left of the internet address (e.g. examplepage.uk), as well as by the display of the letters https (instead of http) as a part of our web address.

If you want to know more about encryption, we recommend you to do a Google search for “Hypertext Transfer Protocol Secure wiki” to find good links to further information.

## Communications

### Communications Overview

Affected parties: Anyone who communicates with us via phone, email or online form

Processed data: e. g. telephone number, name, email address or data entered in forms. You can find more details on this under the respective form of contact

Purpose: handling communication with customers, business partners, etc.

Storage duration: for the duration of the business case and the legal requirements

Legal basis: Article 6 (1) (a) GDPR (consent), Article 6 (1) (b) GDPR (contract), Article 6 (1) (f) GDPR (legitimate interests)

If you contact us and communicate with us via phone, email or online form, your personal data may be processed.

The data will be processed for handling and processing your request and for the related business transaction. The data is stored for this period of time or for as long as is legally required.

### Affected persons

The above-mentioned processes affect all those who seek contact with us via the communication channels we provide.

### Telephone

When you call us, the call data is stored in a pseudonymised form on the respective terminal device, as well as by the telecommunications provider that is being used. In addition, data such as your name and telephone number may be sent via email and stored for answering your inquiries.

The data will be erased as soon as the business case has ended and the legal requirements allow for its erasure.

## Email

If you communicate with us via email, your data is stored on the respective terminal device (computer, laptop, smartphone, ...) as well as on the email server. The data will be deleted as soon as the business case has ended and the legal requirements allow for its erasure.

## Online forms

If you communicate with us using an online form, your data is stored on our web server and, if necessary, forwarded to our email address. The data will be erased as soon as the business case has ended and the legal requirements allow for its erasure.

## Legal bases

Data processing is based on the following legal bases:

- Art. 6 para. 1 lit. a GDPR (consent): You give us your consent to store your data and to continue to use it for the purposes of the business case;
- Art. 6 para. 1 lit. b GDPR (contract): For the performance of a contract with you or a processor such as a telephone provider, or if we have to process the data for pre-contractual activities, such as preparing an offer;
- Art. 6 para. 1 lit. f GDPR (legitimate interests): We want to conduct our customer inquiries and business communication in a professional manner. Thus, certain technical facilities such as email programs, Exchange servers and mobile network operators are necessary to efficiently operate our communications.

## Cookies

### Cookies Overview

Affected parties: visitors to the website

Purpose: depending on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.

Processed data: depends on the cookie used. More details can be found below or from the manufacturer of the software that sets the cookie.

Storage duration: can vary from hours to years, depending on the respective cookie

Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## What are cookies?

Our website uses HTTP-cookies to store user-specific data.

In the following we explain what cookies are and why they are used, so that you can better understand the following privacy policy.

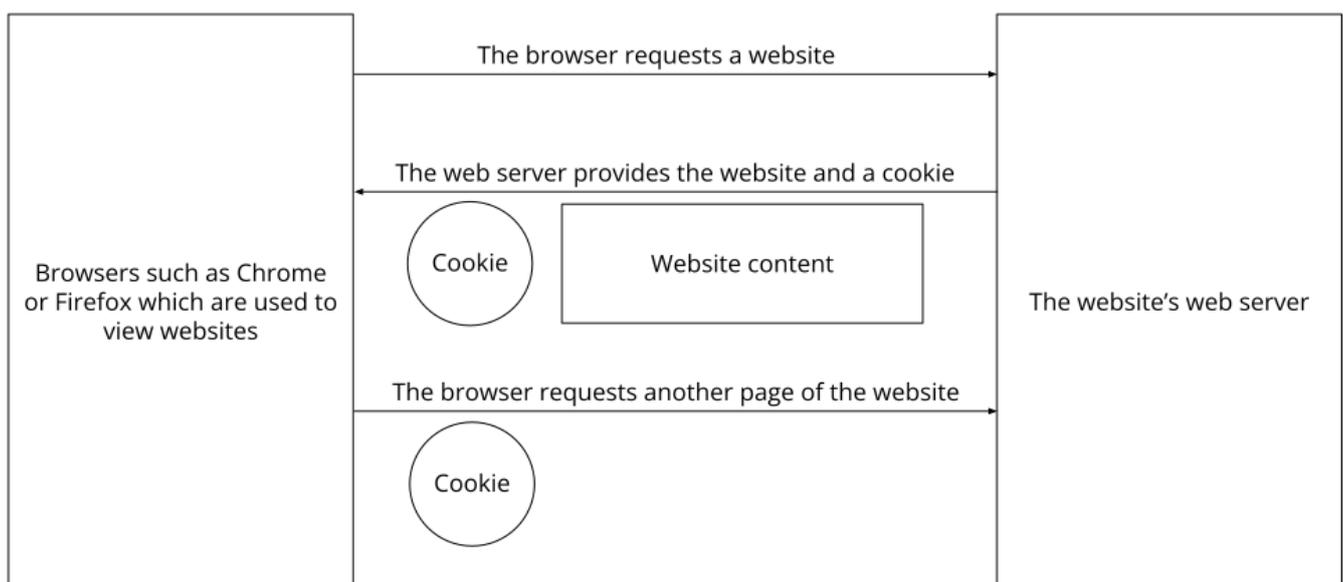
Whenever you surf the Internet, you are using a browser. Common browsers are for example,

Chrome, Safari, Firefox, Internet Explorer and Microsoft Edge. Most websites store small text-files in your browser. These files are called cookies.

It is important to note that cookies are very useful little helpers. Almost every website uses cookies. More precisely, these are HTTP cookies, as there are also other cookies for other uses. HTTP cookies are small files that our website stores on your computer. These cookie files are automatically placed into the cookie-folder, which is the “brain” of your browser. A cookie consists of a name and a value. Moreover, to define a cookie, one or multiple attributes must be specified.

Cookies store certain user data about you, such as language or personal page settings. When you re-open our website to visit again, your browser submits these “user-related” information back to our site. Thanks to cookies, our website knows who you are and offers you the settings you are familiar to. In some browsers, each cookie has its own file, while in others, such as Firefox, all cookies are stored in one single file.

The following graphic shows a possible interaction between a web browser such as Chrome and the web server. The web browser requests a website and receives a cookie back from the server. The browser then uses this again as soon as another page is requested.



There are both first-party cookies and third-party cookies. First-party cookies are created directly by our site, while third-party cookies are created by partner-websites (e.g. Google Analytics). Each cookie must be evaluated individually, as each cookie stores different data. The expiry time of a cookie also varies from a few minutes to a few years. Cookies are not software programs and do not contain viruses, trojans or other malware. Cookies also cannot access your PC's information.

This is an example of how cookie-files can look:

**Name:** \_ga

**Value:** GA1.2.1326744211.152122394158-9

**Purpose:** Differentiation between website visitors

**Expiry date:** after 2 years

A browser should support these minimum sizes:

- At least 4096 bytes per cookie
- At least 50 cookies per domain
- At least 3000 cookies in total

## **Which types of cookies are there?**

The exact cookies that we use, depend on the used services, which will be outlined in the following sections of this privacy policy. Firstly, we will briefly focus on the different types of HTTP-cookies.

There are 4 different types of cookies:

### **Essential cookies**

These cookies are necessary to ensure the basic functions of a website. They are needed when a user for example puts a product into their shopping cart, then continues surfing on different websites and comes back later in order to proceed to the checkout. These cookies ensure the shopping cart does not get deleted, even if the user closes their browser window.

### **Purposive cookies**

These cookies collect information about user behaviour and whether the user receives any error messages. Furthermore, these cookies record the website's loading time as well as its behaviour in different browsers.

### **Target-orientated cookies**

These cookies ensure better user-friendliness. Thus, information such as previously entered locations, fonts sizes or data in forms stay stored.

### **Advertising cookies**

These cookies are also known as targeting cookies. They serve the purpose of delivering customised advertisements to the user. This can be very practical, but also rather annoying.

Upon your first visit to a website you are usually asked which of these cookie-types you want to accept. Furthermore, this decision will of course also be stored in a cookie.

If you want to learn more about cookies and do not mind technical documentation, we recommend <https://tools.ietf.org/html/rfc6265>, the Request for Comments of the Internet Engineering Task Force (IETF) called "HTTP State Management Mechanism".

## **Purpose of processing via cookies**

The purpose ultimately depends on the respective cookie. You can find out more details below or from the software manufacturer that sets the cookie.

## **Which data are processed?**

Cookies are little helpers for a wide variety of tasks. Unfortunately, it is not possible to tell which data is generally stored in cookies, but in the privacy policy below we will inform you on what data

is processed or stored.

## **Storage period of cookies**

The storage period depends on the respective cookie and is further specified below. Some cookies are erased after less than an hour, while others can remain on a computer for several years.

You can also influence the storage duration yourself. You can manually erase all cookies at any time in your browser (also see “Right of objection” below). Furthermore, the latest instance cookies based on consent will be erased is after you withdraw your consent. The legality of storage will remain unaffected until then.

## **Right of objection – how can I erase cookies?**

You can decide for yourself how and whether you want to use cookies. Regardless of which service or website the cookies originate from, you always have the option of erasing, deactivating or only partially accepting cookies. You can for example block third-party cookies but allow all other cookies.

If you want to find out which cookies have been stored in your browser, or if you want to change or erase cookie settings, you can find this option in your browser settings:

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

If you generally do not want cookies, you can set up your browser in a way to notify you whenever a cookie is about to be set. This gives you the opportunity to manually decide to either permit or deny the placement of every single cookie. This procedure varies depending on the browser. Therefore, it might be best for you to search for the instructions in Google. If you are using Chrome, you could for example put the search term “delete cookies Chrome” or “deactivate cookies Chrome” into Google.

## **Legal basis**

The so-called “cookie directive” has existed since 2009. It states that the storage of cookies requires your **consent** (Article 6 Paragraph 1 lit. a GDPR). Within countries of the EU, however, the reactions to these guidelines still vary greatly. In Austria, however, this directive was implemented in Section 96 (3) of the Telecommunications Act (TKG). In Germany, the cookie guidelines have not been implemented as national law. Instead, this guideline was largely implemented in Section 15 (3) of the Telemedia Act (TMG).

For absolutely necessary cookies, even if no consent has been given, there are legitimate interests (Article 6 (1) (f) GDPR), which in most cases are of an economic nature. We want to offer our visitors a pleasant user experience on our website. For this, certain cookies often are absolutely necessary.

This is exclusively done with your consent, unless absolutely necessary cookies are used. The legal basis for this is Article 6 (1) (a) of the GDPR.

In the following sections you will find more detail on the use of cookies, provided the used software does use cookies.

## Customer Data

### Customer Data Overview

Affected parties: Customers or business and contractual partners

Purpose: Performance of a contract for the provision of agreed services or prior to entering into such a contract, including associated communications.

Data processed: name, address, contact details, email address, telephone number, payment information (such as invoices and bank details), contract data (such as duration and subject matter of the contract), IP address, order data

Storage period: the data will be erased as soon as they are no longer required for our business purposes and there is no legal obligation to process them.

Legal bases: Legitimate interests (Art. 6 Para. 1 lit. f GDPR), Contract (Art. 6 Para. 1 lit. b GDPR)

### What is customer data?

In order to be able to offer our services and contractual services, we also process data from our customers and business partners. This data always includes personal data. Customer data is all information that is processed on the basis of contractual or pre-contractual agreements so that the offered services can be provided. Customer data is therefore all the information we collect and process about our customers.

### Why do we process customer data?

There are many reasons why we collect and process customer data. The main reason is that we simply need specific data to provide our services. Sometimes for example your email address may be enough. But if you purchase a product or service, we may e. g. also need data such as your name, address, bank details or other contract data. This data will subsequently be used for marketing and sales optimisation so that we can improve our overall service for our customers and clients. Another important reason for data processing is our customer service, which is very important to us. We want you to have the opportunity to contact us at any time with questions about our offers. Thus, we may need certain data such as your email address at the very least.

### What data is processed?

Exactly which data is stored can only be shown by putting them in categories. All in all, it always depends on which of our services you receive. In some cases, you may only give us your email address so that we can e. g. contact you or answer your questions. In other instances, you may

purchase one of our products or services. Then we may need significantly more information, such as your contact details, payment details and contract details.

Here is a list of potential data we may receive and process:

- Name
- Contact address
- Email address
- Phone number
- Your birthday
- Payment data (invoices, bank details, payment history, etc.)
- Contract data (duration, contents)
- Usage data (websites visited, access data, etc.)
- Metadata (IP address, device information)

## How long is the data stored?

We erase corresponding customer data as soon as we no longer need it to fulfill our contractual obligations and purposes, and as soon as the data is also no longer necessary for possible warranty and liability obligations. This can for example be the case when a business contract ends. Thereafter, the limitation period is usually 3 years, although longer periods may be possible in individual cases. Of course, we also comply with the statutory retention requirements. Your customer data will certainly not be passed on to third parties unless you have given your explicit consent.

## Legal Basis

The legal basis for the processing of your data is Article 6 Paragraph 1 Letter a GDPR (consent), Article 6 Paragraph 1 Letter b GDPR (contract or pre-contractual measures), Article 6 Paragraph 1 Letter f GDPR (legitimate interests) and in special cases (e. g. medical services) Art. 9 (2) lit. GDPR (processing of special categories).

In the case of protecting vital interests, data processing is carried out in accordance with Article 9 Paragraph 2 Letter c. GDPR. For the purposes of health care, occupational medicine, medical diagnostics, care or treatment in the health or social sectors or for the administration of systems and services in health or social sectors, the processing of personal data takes place in accordance with Art. 9 Para. 2 lit. h. GDPR. If you voluntarily provide data of these special categories, the processing takes place on the basis of Article 9 Paragraph 2 lit. a GDPR.

## Social Media

### **Social Media Privacy Policy Overview**

Affected parties: website visitors

Purpose: Service presentation and optimisation, staying in contact with visitors, interested parties, etc. as well as advertising

Processed data: data such as telephone numbers, email addresses, contact data, data on user behaviour, information about your device and your IP address.

You can find more details on this directly at the respective social media tool used.

Storage period: depending on the social media platforms used

Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## **What is Social Media?**

In addition to our website, we are also active on various social media platforms. For us to be able to target interested users via social networks, user data may be processed. Additionally, elements of social media platforms may be embedded directly in our website. This is e.g. the case if you click a so-called social button on our website and are forwarded directly to our social media presence. So-called social media are websites and apps on which registered members can produce and exchange content with other members, be it openly or in certain groups and networks.

## **Why do we use Social Media?**

For years, social media platforms have been the place where people communicate and get into contact online. With our social media presence, we can familiarise interested people better with our products and services. The social media elements integrated on our website help you switch to our social media content quickly and hassle free.

The data that is retained and processed when you use a social media channel is primarily used to conduct web analyses. The aim of these analyses is to be able to develop more precise and personal marketing and advertising strategies. The evaluated data on your behaviour on any social media platform can help to draw appropriate conclusions about your interests. Moreover, so-called user profiles can be created. Thus, the platforms may also present you with customised advertisements. For this, cookies are usually placed in your browser, which store data on your user behaviour.

We generally assume that we will continue to be responsible under Data Protection Law, even when using the services of a social media platform. However, the European Court of Justice has ruled that, within the meaning of Art. 26 GDPR, in certain cases the operator of the social media platform can be jointly responsible with us. Should this be the case, we will point it out separately and work on the basis of a related agreement. You will then find the essence of the agreement for the concerned platform below.

Please note that when you use social media platforms or our built-in elements, your data may also be processed outside the European Union, as many social media channels, such as Facebook or Twitter, are American companies. As a result, you may no longer be able to easily claim or enforce your rights regarding your personal data.

## **Which data are processed?**

Exactly which data are stored and processed depends on the respective provider of the social media platform. But usually it is data such as telephone numbers, email addresses, data you enter in contact forms, user data such as which buttons you click, what you like or who you follow, when you visited which pages, as well as information about your device and IP address. Most of this data is stored in cookies. Should you have a profile on the social media channel you are visiting and are logged in, data may be linked to your profile.

All data that are collected via social media platforms are also stored on the providers' servers. This means that only the providers have access to the data and can provide you with appropriate

information or make changes for you.

If you want to know exactly which data is stored and processed by social media providers and how you can object to the data processing, we recommend you to carefully read the privacy policy of the respective company. We also recommend you to contact the provider directly if you have any questions about data storage and data processing or if you want to assert any corresponding rights.

## **Duration of data processing**

Provided we have any further information on this, we will inform you about the duration of the data processing below. The social media platform Facebook example stores data until they are no longer needed for the company's own purposes. However, customer data that is synchronised with your own user data is erased within two days. Generally, we only process personal data for as long as is absolutely necessary for the provision of our services and products. This storage period can also be exceeded however, if it is required by law, such as e.g. in the case of accounting.

## **Right to object**

You also retain the right and the option to revoke your consent to the use of cookies or third-party providers such as embedded social media elements at any time. This can be done either via our cookie management tool or via other opt-out functions. You can e.g. also prevent data collection via cookies by managing, deactivating or erasing cookies in your browser.

Since cookies may be used with social media tools, we also recommend you to read our privacy policy on cookies. If you want to find out which of your data is stored and processed, we advise you to read the privacy policies of the respective tools.

## **Legal basis**

If you have consented to the processing and storage of your data by integrated social media elements, this consent serves as the legal basis for data processing (**Art. 6 para. 1 lit. a GDPR**). Generally, provided you have given your consent, your data will also be stored and processed on the basis of our legitimate interest (**Art. 6 para. 1 lit. f GDPR**) in maintaining fast and good communication with you and other customers and business partners. Nevertheless, we only use the tools if you have consented. Most social media platforms also set cookies on your browser to store data. We therefore recommend you to read our privacy policy on cookies carefully and to take a look at the privacy policy or cookie policy of the respective service provider.

in the following section you can find information on special social media platforms – provided this information is available.

## **Facebook Privacy Policy**

### **Facebook Privacy Policy Overview**

Affected parties: website visitors

Purpose: service optimisation

Processed data: data such as customer data, data on user behaviour, device information and IP address.

You can find more details in the Privacy Policy below.

Storage period: until the data no longer serves Facebook's purposes

Legal bases: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## **What are Facebook tools?**

We use selected Facebook tools on our website. Facebook is a social media network of the company Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland. With the aid of this tool we can provide the best possible offers to you and anyone interested in our products and services.

If your data is collected and forwarded via our embedded Facebook elements or via our Facebook page (fanpage), both we and Facebook Ireland Ltd. are responsible for this. However, should any further processing occur, then Facebook is solely responsible for this data. Our joint commitments were also set out in a publicly available agreement at [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum). It e.g. states that we must clearly inform you about the use of Facebook tools on our website. We are also responsible for ensuring that the tools are securely integrated into our website and are in accordance with the applicable privacy laws. Facebook, on the other hand, is e.g. responsible for the data security of Facebook's products. If you have any questions about Facebook's data collection and processing, you can contact the company directly. Should you direct the question to us, we are obliged to forward it to Facebook.

In the following we will give you an overview on the different Facebook tools, as well as on what data is sent to Facebook and how you can erase this data.

Along with many other products, Facebook also offers so called "Facebook Business Tools". This is Facebook's official name for its tools, but it is not very common. Therefore, we decided to merely call them "Facebook tools". They include the following:

- Facebook-Pixel
- Social Plugins (e.g. the "Like" or "Share" button)
- Facebook Login
- Account Kit
- APIs (application programming interface)
- SDKs (Software development kits)
- Platform-integrations
- Plugins
- Codes
- Specifications
- Documentations
- Technologies and Services

With these tools Facebook can extend its services and is able to receive information on user activities outside of Facebook.

## **Why do we use Facebook tools on our website?**

We only want to show our services and products to people who are genuinely interested in them. With the help of advertisements (Facebook Ads) we can reach exactly these people. However, to be able to show suitable adverts to users, Facebook requires additional information on people's needs and wishes. Therefore, information on the user behaviour (and contact details) on our website, are provided to Facebook. Consequently, Facebook can collect better user data and is able to display suitable adverts for our products or services. Thanks to the tools it is possible to create targeted, customised ad campaigns of Facebook.

Facebook calls data about your behaviour on our website "event data" and uses them for analytics services. That way, Facebook can create "campaign reports" about our ad campaigns' effectiveness on our behalf. Moreover, by analyses we can get a better insight in how you use our services, our website or our products. Therefore, some of these tools help us optimise your user experience on our website. With the social plugins for instance, you can share our site's contents directly on Facebook.

## **What data is stored by Facebook tools?**

With the use of Facebook tools, personal data (customer data) may be sent to Facebook. Depending on the tools used, customer data such as name, address, telephone number and IP address may be transmitted.

Facebook uses this information to match the data with the data it has on you (if you are a Facebook member). However, before the customer data is transferred to Facebook, a so called "Hashing" takes place. This means, that a data record of any size is transformed into a string of characters, which also has the purpose of encrypting data.

Moreover, not only contact data, but also "event data" is transferred. These data are the information we receive about you on our website. To give an example, it allows us to see what subpages you visit or what products you buy from us. Facebook does not disclose the obtained information to third parties (such as advertisers), unless the company has an explicit permission or is legally obliged to do so. Also, "event data" can be linked to contact information, which helps Facebook to offer improved, customised adverts. Finally, after the previously mentioned matching process, Facebook deletes the contact data.

To deliver optimised advertisements, Facebook only uses event data, if they have been combined with other data (that have been collected by Facebook in other ways). Facebook also uses event data for the purposes of security, protection, development and research. Many of these data are transmitted to Facebook via cookies. Cookies are little text files, that are used for storing data or information in browsers. Depending on the tools used, and on whether you are a Facebook member, a different number of cookies are placed in your browser. In the descriptions of the individual Facebook tools we will go into more detail on Facebook cookies. You can also find general information about the use of Facebook cookies at

<https://www.facebook.com/policies/cookies>.

## How long and where are the data stored?

Facebook fundamentally stores data, until they are no longer of use for their own services and products. Facebook has servers for storing their data all around the world. However, customer data is cleared within 48 hours after they have been matched with their own user data.

## How can I erase my data or prevent data retention?

In accordance with the General Data Protection Regulation (GDPR) you have the right of information, rectification, transfer and deletion of your data.

The collected data is only fully deleted, when you delete your entire Facebook account. Deleting your Facebook account works as follows:

- 1) Click on settings in the top right side in Facebook.
- 2) Then, click "Your Facebook information" in the left column.
- 3) Now click on "Deactivation and deletion".
- 4) Choose "Permanently delete account" and then click on "Continue to account deletion".
- 5) Enter your password, click on "continue" and then on "Delete account".

The retention of data Facebook receives via our site is done via cookies (e.g. with social plugins), among others. You can deactivate, clear or manage both all and individual cookies in your browser. How this can be done differs depending on the browser you use. The following instructions show, how to manage cookies in your browser:

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

If you generally do not want to allow any cookies at all, you can set up your browser to notify you whenever a cookie is about to be set. This gives you the opportunity to decide upon the permission or deletion of every single cookie.

## Legal basis

If you have consented to your data being processed and stored by integrated Facebook tools, this consent is the legal basis for data processing (**Art. 6 para. 1 lit. a GDPR**). Generally, your data is

also stored and processed on the basis of our legitimate interest (**Art. 6 para. 1 lit. f GDPR**) to maintain fast and good communication with you or other customers and business partners. Nevertheless, we only use these tools if you have given your consent. Most social media platforms also set cookies on your browser to store data. We therefore recommend you to read our privacy policy about cookies carefully and to take a look at the privacy policy or Facebook's cookie policy.

Facebook also processes data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfers to the USA. This can be associated with various risks to the legality and security of data processing.

Facebook uses standard contractual clauses approved by the EU Commission as basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfer there (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Facebook to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847)

We hope we could give you an understanding of the most important information about the use of Facebook tools and data processing. If you want to find out more on how Facebook use your data, we recommend reading the data policies at <https://www.facebook.com/about/privacy/update>.

## Facebook Social Plugins Privacy Policy

We installed so-called social plugins from Facebook Inc. to our website. You can recognise these buttons by the classic Facebook logo, the "Like" button (hand with raised thumb) or by a "Facebook plugin" label. A social plugin is a small part of Facebook that is integrated into our page. Each plugin has its own function. The most used functions are the well-known "Like" and "Share" buttons.

Facebook offers the following social plugins:

- "Save" button
- "Like" button, Share, Send and Quote
- Page plugin
- Comments
- Messenger plugin
- Embedded posts and video player
- Group Plugin

At <https://developers.facebook.com/docs/plugins> you will find more information on how the individual plugins are used. On the one hand, we use the social plug-ins to offer you a better user experience on our site, and on the other hand because Facebook can optimise our advertisements with it.

If you have a Facebook account or have already visited [facebook.com](https://www.facebook.com), Facebook has already placed at least one cookie in your browser. In this case, your browser sends information to Facebook via

this cookie as soon as you visit our website or interact with social plugins (e.g. the “Like” button).

The received information will be deleted or anonymised within 90 days. According to Facebook, this data includes your IP address, the websites you have visited, the date, time and other information relating to your browser.

In order to prevent Facebook from collecting much data and matching it with your Facebook data during your visit to our website, you must log out of Facebook while you visit our website.

If you are not logged in to Facebook or do not have a Facebook account, your browser sends less information to Facebook because you have fewer Facebook cookies. Nevertheless, data such as your IP address or which website you are visiting can be transmitted to Facebook. We would like to explicitly point out that we do not know what exact data is collected. However, based on our current knowledge, we want to try informing you as best we can about data processing. You can also read about how Facebook uses the data in the company’s data policy at <https://www.facebook.com/about/privacy/update>.

At least the following cookies are set in your browser when you visit a website with social plugins from Facebook:

**Name:** dpr

**Value:** no information

**Purpose:** This cookie is used to make the social plugins work on our website.

**Expiry date:** after end of session

**Name:** fr

**Value:** 0jiejyh4122394158c2GnlufEJ9..Bde09j...1.0.Bde09j

**Purpose:** The cookie is also necessary for the plugins to function properly

**Expiry date:** after 3 months

**Note:** These cookies were set after our test and may be placed even if you are not a Facebook member.

If you are registered with Facebook, you can change your settings for advertisements yourself at [https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen). If you are not a Facebook user, you can go to <https://www.youronlinechoices.com/uk/your-ad-choices/> and manage your usage-based online advertising. There you have the option to deactivate or activate providers.

If you want to learn more about Facebook’s data protection, we recommend the company’s own data policies at <https://www.facebook.com/policy.php>.

## Instagram Privacy Policy

### **Instagram Privacy Policy Overview**

Affected parties: website visitors

Purpose: optimising our service

Processed data: includes data on user behaviour, information about your device and IP address.

More details can be found in the privacy policy below.

Storage period: until Instagram no longer needs the data for its purposes

Legal basis: Art. 6 para. 1 lit. a GDPR (consent), Art. 6 para. 1 lit. f GDPR (legitimate interests)

## **What is Instagram?**

We have integrated functions of Instagram to our website. Instagram is a social media platform of the company Instagram LLC, 1601 Willow Rd, Menlo Park CA 94025, USA. Since 2012, Instagram is a subsidiary company of Facebook Inc. and is a part of Facebook's products. The inclusion of Instagram's contents on our website is called embedding. With this, we can show you Instagram contents such as buttons, photos or videos directly on our website. If you open websites of our online presence, that have an integrated Instagram function, data gets transmitted to, as well as stored and processed by Instagram. Instagram uses the same systems and technologies as Facebook. Therefore, your data will be processed across all Facebook firms.

In the following, we want to give you a more detailed insight on why Instagram collects data, what data these are and how you can control data processing. As Instagram belongs to Facebook Inc., we have, on the one hand received this information from the Instagram guidelines, and on the other hand from Facebook's Data Policy.

Instagram is one of the most famous social media networks worldwide. Instagram combines the benefits of a blog with the benefits of audio-visual platforms such as YouTube or Vimeo. To "Insta" (how the platform is casually called by many users) you can upload photos and short videos, edit them with different filters and also share them to other social networks. Also, if you do not want to be active on Instagram yourself, you can just follow other interesting users.

## **Why do we use Instagram on our website?**

Instagram is a social media platform whose success has skyrocketed within recent years. Naturally, we have also reacted to this boom. We want you to feel as comfortable as possible on our website. Therefore, we attach great importance to diversified contents. With the embedded Instagram features we can enrich our content with helpful, funny or exciting Instagram contents. Since Instagram is a subsidiary company of Facebook, the collected data can also serve us for customised advertising on Facebook. Hence, only persons who are genuinely interested in our products or services can see our ads.

Instagram also uses the collected data for tracking and analysis purposes. We receive summarised statistics and therefore more insight to your wishes and interests. It is important to mention that these reports do not identify you personally.

## What data is stored by Instagram?

Whenever you land on one of our sites, which have Instagram functions (i.e. Instagram photos or plugins) integrated to them, your browser automatically connects with Instagram's servers. Thereby, data is sent to, as well as saved and processed by Instagram. This always happens, whether you have an Instagram account or not. Moreover, it includes information on our website, your computer, your purchases, the advertisements you see and on how you use our offer. The date and time of your interaction is also stored. If you have an Instagram account or are logged in, Instagram saves significantly more data on you.

Facebook distinguishes between customer data and event data. We assume this is also the case for Instagram. Customer data are for example names, addresses, phone numbers and IP addresses. These data are only transmitted to Instagram, if they have been "hashed" first. Thereby, a set of data is transformed into a string of characters, which encrypts any contact data. Moreover, the aforementioned "event data" (data on your user behaviour) is transmitted as well. It is also possible, that contact data may get combined with event data. The collected data data is matched with any data Instagram already has on you.

Furthermore, the gathered data are transferred to Facebook via little text files (cookies) which usually get set in your browser. Depending on the Instagram function used, and whether you have an Instagram account yourself, the amount of data that gets stored varies.

We assume data processing on Instagram works the same way as on Facebook. Therefore, if you have an account on Instagram or have visited [www.instagram.com](http://www.instagram.com), Instagram has set at least one cookie. If this is the case, your browser uses the cookie to send information to Instagram, as soon as you come across an Instagram function. No later than 90 days (after matching) the data is deleted or anonymised. Even though we have studied Instagram's data processing in-depth, we cannot tell for sure what exact data Instagram collects and retains.

In the following we will show you a list of the least cookies placed in your browser when click on an Instagram function (e.g. button or an Insta picture). In our test we assume you do not have an Instagram account, since if you would be logged in to your Instagram account, your browser would place significantly more cookies.

The following cookies were used in our test:

**Name:** csrftoken

**Value:** ""

**Purpose:** This cookie is most likely set for security reasons to prevent falsifications of requests. We could not find out more information on it.

**Expiry date:** after one year

**Name:** mid

**Value:** ""

**Purpose:** Instagram places this cookie to optimise its own offers and services in- and outside of Instagram. The cookie allocates a unique user ID.

**Expiry date:** after end of session

**Name:** fbsr\_122394158124024

**Value:** no information

**Purpose:** This cookie stores the login request of Instagram app users.

**Expiry date:** after end of session

**Name:** rur

**Value:** ATN

**Purpose:** This is an Instagram cookie which guarantees functionality on Instagram.

**Expiry date:** after end of session

**Name:** urlgen

**Value:** "{194.96.75.33": 1901};1iEtYv:Y833k2\_UjKvXgYe122394158"

**Purpose:** This cookie serves Instagram's marketing purposes.

**Expiry date:** after end of session

**Note:** We do not claim this list to be exhaustive. The cookies that are placed in each individual case, depend on the functions embedded as well as on your use of Instagram.

## How long and where are these data stored?

Instagram shares the information obtained within the Facebook businesses with external partners and persons you are globally connected with. Data processing is done according to Facebook's internal data policy. Your data is distributed to Facebook's servers across the world, partially for security reasons. Most of these servers are in the USA.

## How can I erase my data or prevent data retention?

Thanks to the General Data Protection Regulation (GDPR), you have the right of information, rectification, transfer and deletion of your data. Furthermore, you can manage your data in Instagram's settings. If you want to delete your data on Instagram completely, you will have to delete your Instagram account permanently.

And this is how an Instagram account can be deleted:

First, open the Instagram app. Then, navigate to your profile page, select the three bars in the top right, choose "Settings" and then click "Help". Now, you will be redirected to the company's website, where you must click on "Managing Your Account" and then "Delete Your Account".

When you delete your account completely, Instagram deletes posts such as your photos and status updates. Any information other people shared about you are not a part of your account and do therefore not get deleted.

As mentioned before, Instagram primarily stores your data via cookies. You can manage, deactivate or delete these cookies in your browser. Depending on your browser, managing them varies a bit. We will show you the instructions of the most relevant browsers here.

[Chrome: Clear, enable and manage cookies in Chrome](#)

[Safari: Manage cookies and website data in Safari](#)

[Firefox: Clear cookies and site data in Firefox](#)

[Internet Explorer: Delete and manage cookies](#)

[Microsoft Edge: Delete cookies in Microsoft Edge](#)

Generally, you can set your browser to notify you whenever a cookie is about to be set. Then you can individually decide upon the permission of every cookie.

## Legal basis

If you have consented to the processing and storage of your data by integrated social media elements, this consent is the legal basis for data processing (**Art. 6 para. 1 lit. a GDPR**). Generally, your data is also stored and processed on the basis of our legitimate interest (**Art. 6 para. 1 lit. f GDPR**) to maintain fast and good communication with you or other customers and business partners. We only use the integrated social media elements if you have given your consent. Most social media platforms also place cookies in your browser to store data. We therefore recommend you to read our privacy policy about cookies carefully and to take a look at the privacy policy or the cookie policy of the respective service provider.

Instagram and Facebook also process data in the USA, among other countries. We would like to note, that according to the European Court of Justice, there is currently no adequate level of protection for data transfer to the USA. This can be associated with various risks to the legality and security of data processing.

As a basis for data processing by recipients based in third countries (outside the European Union, Iceland, Liechtenstein, Norway and especially in the USA) or data transfers there, Facebook uses standard contractual clauses approved by the EU Commission (= Art. 46, paragraphs 2 and 3 of the GDPR). These clauses oblige Facebook to comply with the EU's level of data protection when processing relevant data outside the EU. These clauses are based on an implementing order by the EU Commission. You can find the order and the clauses here:

[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_21\\_2847](https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2847)

We have tried to give you the most important information about data processing by Instagram. On

<https://help.instagram.com/519522125107875>

you can take a closer look at Instagram's data guidelines.

## Online Booking Systems Introduction

### **Online Booking Systems Privacy Policy Overview**

Affected parties: website visitors

Purpose: improvement of user experience and organisation

Processed data: depends heavily on the services used. Usually, data such as IP address, contact and payment details and/or technical data is processed. You can get more details on this directly from the respective tools used.

Storage duration: depends on the tools used

Legal bases: Article 6 paragraph 1 lit. a GDPR (consent), Article 6 paragraph 1 lit. f GDPR (legitimate interests)

## **What is an online booking system?**

We use one or more booking systems which enable you to make bookings via our website. That way e.g. appointments can easily be created online. A booking system is a software application integrated into our website that displays available resources (such as available appointments) and allows you to book – and usually, also pay – directly online. You've probably already come across many such booking systems from the restaurant or hotel industry. However, such systems are actually used in a wide variety of industries. Depending on the tool and settings, booking systems can be used both by us internally, as well as by customers like yourself. In most cases, your personal data is also collected and stored.

Bookings usually work as follows: You will find a booking system on our website, through which you can book an appointment directly with one click. Then you will enter your data and usually also be able to pay immediately. You may also have the option to enter various information about yourself into a form. Please be aware that any information you enter may be stored and managed in a database.

## **Why do we use an online booking system?**

In a way, we also consider our website a free service for you. We want you to receive helpful information on our site and feel comfortable on there. This also includes an online service that makes it as easy as possible for you to book appointments or services. Gone are the days when you had to wait days for booking confirmations via phone or email. With an online booking system, you can get everything done after just a few clicks and get on with your day. The system also makes it easier for us to manage all bookings and appointments. Therefore, we consider a booking system absolutely sensible for both you and ourselves.

## **Which data is processed?**

In this general introduction about booking systems, we naturally cannot tell you exactly what data is processed for which system. It always depends on the tool used, as well as the functions and possibilities it contains. What is more, in addition to the conventional booking function, many booking systems also offer a range of other features. For example, many systems also have an external online payment system (e.g. Stripe, Klarna or Paypal) and an integrated calendar synchronisation function. Accordingly, different data and different amounts of data can be processed, depending on the included functions. Usually, data such as your IP address, name and

contact details, technical device information and the time of your booking are processed. If you also make a payment via the system, your bank details such as your account number, credit card number, passwords, TANs etc. will also be stored and passed on to the respective payment provider. We recommend you carefully read the respective privacy policy of the tool used, so that you know which of your data is processed specifically.

## **Duration of data processing**

Each booking system stores data for different lengths of time. Therefore, we cannot yet give any specific information about the duration of data processing in this instance. In general, however, personal data is only stored for as long as is absolutely necessary to provide the services. Booking systems usually also use cookies, which store information for different lengths of time. While some cookies are erased immediately after leaving the site, others can be stored for a number of years. You can find out more about this in our “Cookies” section. Please also take a look at the respective privacy policies of the providers. There you should find answers on how long your data will be stored specifically.

## **Right to object**

If you have consented to data processing by a booking system, you always retain the option and the right to revoke this consent. So please, always be aware that you have rights in relation to your personal data and that you can exercise these rights at any time. Thus, if you do not agree to the processing of your personal data, then none of your personal data may be processed. It is that simple. The easiest way to revoke data processing is via a cookie consent tool or via other available opt-out functions. You can, for example, manage data retention by cookies directly in your browser. Until you withdraw your consent, the lawfulness of data processing remains unaffected.

## **Legal Basis**

If you have agreed that booking systems may be used, this consent is the legal basis for the corresponding data processing. According to Article 6 (1) (a) GDPR (consent), your consent represents the legal basis for the processing of personal data, as it may occur through the use of booking systems.

Furthermore, we also have a legitimate interest in using booking systems because we use them to extend our customer service and to optimise our internal booking organisation. The corresponding legal basis for this is Article 6 (1) (f) GDPR (legitimate interests). However, we strongly want to emphasise once more that we only use these tools if you have given your consent.

You can find information on different booking systems – if available – in the following sections.

## **Explanation of the terminology used**

We always strive to make our privacy policy as clear and comprehensible as possible. However, this is not always easy, especially when it comes to technical and legal matters. It is often sensible to use legal terms (such as ‘personal data’) or certain technical terms (such as ‘cookies’ or ‘IP address’).

But we don't want to use such terms without any explanation. This is why you will find an alphabetical list of important terms used below. These are terms we may not yet have sufficiently explained in the privacy policy. In case we have adopted any of these terms from the GDPR which are definitions, we will also list the GDPR texts here and add our own further explanations if necessary.

## Consent

### Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

*“consent” of the data subject means 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;*

**Explanation:** With websites, such consent is usually given via a cookie consent tool. You've most certainly come across these. Whenever you visit a website for the first time, you will usually be asked via a banner whether you agree or consent to the data processing. You can usually also make individual settings and thus decide for yourself which level of data processing you want to allow. If you do not give your consent, no personal data may be processed. Consent can of course also be given in writing, i.e. not via a tool.

## Personal Data

### Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

*“personnel data” means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;*

**Explanation:** Personal data is all data that can identify you as a person. This is usually data such as:

- name
- address
- email address
- postal address
- phone number

- birthday
- identification numbers such as social security number, tax identification number, ID card number or matriculation number
- banking data such as account number, credit information, account balances and more.

According to the European Court of Justice (ECJ), your **IP address is also personal data**. IT experts can use your IP address to determine at least the approximate location of your device and subsequently your location as the connection owner. Therefore, storing an IP address also requires a legal basis within the scope of the GDPR. There are also so-called **“special categories”** of personal data, which are particularly worthy of protection. These include:

- racial and ethnic origin
- political opinions
- religious or ideological beliefs
- Union membership
- genetic data such as data obtained from blood or saliva samples
- biometric data (this is information about psychological, physical or behavioural characteristics that can identify an individual).
- health Data
- Data relating to sexual orientation or sex life

## Enterprise

### Definition according to Article 4 of the GDPR

For the purposes of this Regulation, the term means:

***“Enterprise”** means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity;*

**Explanation:** For example, we are an enterprise and also carry out an economic activity through our website by offering and selling services and/or products. As a formal characteristic, every enterprise has a legal entity such as a GmbH or an AG.

All texts are copyrighted.