

Privacy policy

Information on data processing pursuant to Artt. 13, 14 GDPR

We are pleased that you are visiting our homepage and thank you for your interest in our hotel group. Handling the data of our interested parties, customers and business partners is a matter of trust. We attach great importance to the trust you place in us and are therefore committed to handling your data with care and protecting it from misuse.

With this information on data protection, we inform you about when we store which data and how we use it - naturally in compliance with the applicable jurisdiction. Data protection at AZIMUT Hotels is based in particular on the European Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG). When using the Internet, we follow the Telecommunications Telemedia Data Protection Act (TTDSG) of the Federal Republic of Germany to protect your personal data. In the following, we explain what information we collect during your visit to our websites and how it is used.

Responsible body

AZIMUT Management Europe GmbH Uhlandstr. 12 D-10623 Berlin Germany Tel: +49 (0) 30 / 40 05 63 70

Mail: info.europe@azimuthotels.de

Data Protection Officer

The data protection officer of the data controller is:

Andreas Thurmann DataSolution LUD GmbH Isarstr. 13 D-14974 Ludwigsfelde Germany Tel.: +49 (0) 3378 202513 Mail: mail@hoteldatenschutz.de



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General information on data processing

As a matter of principle, we collect and use personal data only insofar as this is necessary for the provision of a functional website and our content and services, or we collect and process the data for other purposes independent of the website.

Legal basis for the processing of personal data

We process personal data on the basis of the following legal grounds:

- Insofar as we obtain the **consent of the data subject for** processing operations involving personal data, Art. 6 (1) lit. a GDPR serves as the legal basis.
- When processing personal data that is necessary for the **performance of a contract** to which the data subject is a party, Art. 6 (1) lit. b GDPR serves as the legal basis. This also applies to processing operations that are necessary for the implementation of pre-contractual measures.
- Insofar as the processing of personal data is necessary for the **fulfilment of a legal obligation** (statutory provisions) to which our company is subject, Art. 6 para. 1 lit. c GDPR serves as the legal basis.
- If the processing is necessary to **protect a legitimate interest of** our company or a third party and the interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, Art. 6 (1) lit. f GDPR serves as the legal basis for the processing.

We will refer to the relevant terminology in connection with each processing operation so that you can understand on what basis we process personal data.

If personal data is processed on the basis of your **consent**, you have the right to **revoke** your consent at any time with effect for the future.

If we process data on the basis of a **balance of interests**, you as the data subject have the right to **object to the** processing of personal data, taking into account the requirements of Art. 21 of the GDPR.

Data deletion and storage period

The personal data of the data subject shall be deleted or blocked as soon as the purpose of the storage no longer applies. Storage may also take place if this has been provided for by the European or national legislator in Union regulations, laws or other provisions to which the person responsible is subject. The data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless there is a necessity for the continued storage of the data for the conclusion or fulfilment of a contract.

Contact/E-mail contact

We offer a contact form on our website that you can use to request information about our products or services or to contact us in general. We have marked the data that you must provide in order to respond to a request as mandatory fields. Information on other data fields is voluntary. The form data is transmitted via the internet using encrypted connections.

Alternatively, it is possible to contact us via the e-mail address provided. In this case, your personal data transmitted with the e-mail will be stored.

Purpose and legal basis for data processing

We need this information to process your enquiry, to address you correctly and to send you a reply. In the case of specific enquiries, the data is processed to fulfil a contract or to initiate a contract. In the case of general enquiries, processing takes place on the basis of a balancing of interests.



Enquiries received via the contact form on our website are processed electronically by us in order to answer your enquiry. In this context, other persons or departments and possibly third parties may also become aware of the contents of the form that you have sent.

Duration of storage

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. For personal data sent by e-mail, this is the case when the respective conversation with the user has ended. The conversation is ended when the circumstances indicate that the matter in question has been conclusively clarified. If the contact involves a pre-contractual relationship (offer or reservation enquiry), the transmitted data will also be stored in our hotel or event software and used to execute the contract. If there is no contractual relationship, we delete the data after one year at the end of the year.

Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address <u>info.europe@azimuthotels.de</u> for this purpose. We would like to point out that in the event of an objection, the conversation cannot be continued or we cannot create any offers etc.. All personal data stored in the course of contacting you will be deleted in this case.

Online booking via the website

Our website offers the possibility to book rooms and arrangements for AZIMUT hotels. If you take advantage of this option, the data entered in the input mask will be transmitted to us and stored. These data are:

- First and last name
- Address
- E-mail address
- Payment data (credit card card number, cardholder name, validity period)
- Service data
- Arrival and departure dates
- Coupon code if applicable
- IP address for location tracking

When you make a booking, it is processed by the online reservation system of Amadeus IT Group SA, address: 55 West,46 th Street, 27th Floor, 10036 New York, USA. All booking data you enter is transmitted in encrypted form.

To increase our services, we manage all data received in our hotel software. Access to a guest's master data is used together, e.g. to make a reservation for another hotel at a later date, to rebook or to carry out marketing activities in a centralised manner. For this purpose, central services such as reservations and marketing access this data. The legal basis for processing the data is our legitimate interest in data processing within the framework of central administration and use of the data of our guests, customers and business partners within the hotel group.

Purpose and legal basis for data processing

The processing of the personal data from the input mask serves us solely for the processing of the booking request and the handling of the payment transaction. The legal basis for the processing of the data is the conclusion of an accommodation contract. The transmitted data is stored in our hotel software and used for the execution of the contract.



Duration of storage

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of a contractual relationship, we will delete the data received as soon as national, commercial law, statutory or contractual retention requirements have been fulfilled. In our online booking system, the data is deleted 60 days after check-out.

Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address <u>info.europe@azimuthotels.de</u> for this purpose.

Online booking via other websites

AZIMUT Hotels gives interested parties the option of booking rooms and arrangements via hotel reservation portals (third-party providers). If you take advantage of this option, the data entered in the input mask will be transmitted to us and stored to the extent permitted by the respective hotel reservation portal in accordance with its own data protection regulations. Data can be:

- First and last name
- Address
- E-mail address
- Payment data (credit card card number, cardholder name, validity period)
- Service data
- Number of fellow travellers
- Arrival and departure dates
- estimated time of arrival

The data provided is transferred to our hotel software via a so-called channel manager. All received booking data is transmitted in encrypted form. Amadeus IT Group SA, address: 55 West,46 th Street, 27th Floor, 10036 New York, USA, as the provider of the Channel Manager, has undertaken to handle the transmitted personal data in accordance with data protection regulations.

To increase our services, we manage all data received in our hotel software. Access to a guest's master data is used together, e.g. to make a reservation for another hotel at a later date, to rebook or to carry out marketing activities in a centralised manner. For this purpose, central services such as reservation and marketing access this data. The legal basis for processing the data is our legitimate interest in data processing within the framework of central administration and use of the data of our guests, customers and business partners within the hotel group.

Purpose and legal basis for data processing

The processing of personal data transmitted to us is solely for the purpose of processing the booking request and handling payment transactions. The legal basis for the processing of the data is the conclusion of an accommodation contract. The transmitted data is stored in our hotel software and used for the execution of the contract.

Duration of storage

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of a contractual relationship, we will delete the data received as soon as national, commercial law, statutory or contractual retention requirements have been fulfilled. In our Channel Manager, the data is deleted 60 days after check-out.



Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address <u>info.europe@azimuthotels.de</u> or this purpose.

Online check-in

On our website there is the possibility for guests to do an online check-in before arrival. If you take advantage of this option, the data entered in the input mask will first be transmitted to us and stored. These data are:

- Last name
- Reservation number

In addition, further reservation details can be entered in the personal check-in area:

- Salutation/Title/Gender
- First name
- Address
- Contact details (telephone, e-mail address)
- Birthday
- Nationality
- Language
- Business address
- Badge number
- Signature
- Preferences
- Persons travelling with you

If you make an online check-in from our websites or via an app, the data will be stored in the system of hotelbird GmbH, Plinganserstraße 150, 81369 Munich, Germany.

Purpose and legal basis for data processing

The processing of the personal data from the input mask serves us solely to facilitate the check-in by the guest. The legal basis for the processing of the data is the conclusion of an accommodation contract in conjunction with § 30 of the Federal Registration Act (BMG). § Section 30 of the Federal Registration Act (BMG). The transmitted data is stored in our hotel software and used for the execution of the contract.

Duration of storage

The data is automatically deleted after 15 months.

Possibility of objection

As a recipient, you have the option to object to the processing of your data at any time. We have set up the e-mail address <u>info.europe@azimuthotels.de</u> for this purpose.



Your stay at the hotel

During the stay in our hotel, we collect and process information about guests in our hotel software. Data of the following groups of persons can be stored:

- Guests, business partners, companies
- Interested parties and potential interested parties (e.g. for requests for proposals)

The data stored may include:

- First and last name
- Date of birth
- Contact details (telephone, e-mail address)
- Address
- Nationality
- Company
- Identity card and passport data
- Service data
- Accounting data
- Data on payment processing (e.g. credit card data)
- Video recordings for the collection of evidence in cases of vandalism, burglary, robbery or other criminal offences

If you have made the booking on a hotel portal, with a tour operator or in a travel agency, your data will be forwarded to us by these providers in order to fulfil the concluded contract.

Purposes and legal basis of data processing

We use the personal data provided by you exclusively for the fulfilment of the agreed contractual services, i.e. the management, care and hospitality of guests within the framework of the accommodation contract.

We store your data in our hotel software and in reservation, billing and payment applications. In addition to your personal data, this may include billing data about food and beverages, telephone calls made from the room and/or other hotel-specific services.

Due to the registration regulations (§ 29 ff. Federal Registration Act), we are obliged to ask our guests to fill in a registration form on site or online. In addition to the first name, surname and address, this form also contains information about the guest's birthday, nationality and family members travelling with them. We must also ask foreign guests for their identity card number. All other information is voluntary.

If services are used, as a rule only such data is collected as is required for the provision of the services. If further data is collected, it is voluntary information. Personal data is processed exclusively to fulfil the requested services and to protect our own legitimate business interests in accordance with Art. 6 Para. 1 lit. f GDPR.

Data will be used for the following purposes:

- Registration on arrival and departure incl. completion of the registration form
- The handing out of the room card for yourself and fellow travellers
- Implementation of requested services



- Processing of the payment modalities
- Storage of preferences for future hotel stays

Contact details of our guests may be used for advertising purposes at a later date. The use of the email address requires your consent.

Processing of data for purposes other than those mentioned will only take place insofar as such processing is permissible pursuant to Art. 6 (4) GDPR and is compatible with the original purposes of the contractual relationship. We will inform you about these processing operations prior to any such further processing of your data.

Recipients to whom the data may be disclosed:

- Public bodies that receive data on the basis of statutory regulations (e.g. law enforcement agencies, authorities from the public sector)
- Internal units involved in the execution and fulfilment of the respective business processes (e.g. administration, accounting, sales & marketing, IT organisation)
- Associated hotels (master data in PMS)
- External contractors according to Art. 28 GDPR (service companies)
- Other external bodies (e.g. credit institutions)

Data deletion

The legislator has enacted a variety of retention obligations and periods. After these periods have expired, the corresponding data and data records are routinely deleted if they are no longer required for the fulfilment of the contract. For example, the commercial or financial data of a completed financial year are deleted after a further ten years in accordance with the legal regulations, unless longer retention periods are prescribed or required for justified reasons. Reservation documents can be destroyed after 6 years, the registration form after one year at the end of the quarter. If data is not affected by this, it will be deleted without being requested if the aforementioned purposes cease to apply.

Video recordings are stored for 72 hours.

Online assessment and surveys

Former guests can leave a review at our hotel or participate in a survey after check-out. For this purpose, we would like to send you an e-mail within 14 days after your departure to ask you to submit a hotel review or participate in a survey. Each rating can be published anonymously if you wish. If you did not feel comfortable in one of our hotels, we would like to take the opportunity to contact you.

We use the service provider Revinate Inc. to send the rating e-mail. Each rating can be published anonymously if desired. If you did not feel comfortable in one of our hotels, we would like to take the opportunity to contact you.

In this context, the data will not be passed on to third parties. The data will only be used for the publication of the rating and for arbitration in case of bad ratings.

Purpose and legal basis for data processing

The data will only be used for the publication of the rating and for arbitration in case of bad ratings.

The purpose of the hotel evaluation is to communicate and summarise opinions of hotel guests via our website, so that interested parties can form their own opinion about our performance and services. In addition, the results serve our internal quality management. The legal basis for processing the data is, moreover, our legitimate interest in data processing.



Duration of storage

The data will not be deleted.

Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address <u>info.europe@azimuthotels.de</u> for this purpose.

Azimut Hotel Travel Wishes Portal

Azimut Hotels offers the technical possibility of placing search advertisements for travel offers ("travel requests") via the online tool "Azimut Hotel travel request portal" and thus to establish personal contact with Azimut Hotels travel consultants for the purpose of individual offer communication. The tool can be accessed via a corresponding dialogue box on the Azimut Hotel website and via <u>https://azimuthotels.wish-service.com.</u>

Use of the online tool requires registration as a user. The use is voluntary. When using the tool, the interested party enters his or her travel request, e-mail address and, if applicable, name in the form field.

After a travel consultant has processed a travel request and entered the offer in the online tool, the user receives an e-mail containing a link to the travel request and the offer. The user who has entered the travel request can contact the Azimut Hotels travel consultant in response to the suggestion. However, he is not obliged to respond to a suggestion.

The user can choose via which channel (e-mail, telephone) he/she would like to communicate further with the travel advisor. As long as the user does not provide any contact details for direct contact, communication takes place exclusively via the online tool.

Purpose and legal basis for data processing

We use this contact data exclusively for our own purposes and for the needs-based design of our own sales activities. The legal basis for processing the data is our legitimate interest in data processing. If the contact is aimed at the conclusion of a contract, the additional legal basis for the processing is the business initiation relationship or contractual relationship.

Duration of storage

The travel request and contact details will be deleted as soon as they are no longer required for consultation. If the contact is a pre-contractual relationship (offer, booking or reservation request), the transmitted data will also be stored in our hotel software and used to execute the contract. If there is no contractual relationship, we delete the data after one year at the end of the year.

Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address <u>info.europe@azimuthotels.de</u> for this purpose.

Business customers

For the support, advice and advertising of corporate customers, we collect and use the contact person, telephone number and postal address in addition to the business partner or potential business partner. We obtain the information from various sources, either through an enquiry (e-mail or telephone), but also through events, trade fairs, business cards that our sales employees receive, etc.



Purpose and legal basis for data processing

We use this contact data exclusively for our own purposes and for the needs-based design of our own sales activities. The legal basis for processing the data is our legitimate interest in data processing. If the contact is aimed at concluding a contract, the additional legal basis for processing is the business initiation relationship or contractual relationship. To increase our services, we manage all data received in the CRM module of our central hotel software. In this context, the data is not passed on to third parties.

Duration of storage

In principle, no deletion period is foreseen. However, if our sales department has not had any contact with the company contact within 3 years, the sales department will decide whether the contact person of the company contact will be deleted.

If the contact is a pre-contractual relationship (offer, booking or reservation request), the transmitted data will also be stored in our hotel software and used to execute the contract. If there is no contractual relationship, we delete the data after one year at the end of the year.

Possibility of objection

As a company contact, you have the option to object to the processing of your data at any time. We have set up the e-mail address <u>info.europe@azimuthotels.de</u> for this purpose. All personal data of the contact person that has been stored for the business partner will be deleted in this case.

Your application to a job advertisement

It is possible to apply for advertised positions via internet portals such as Hotelcareer or directly. If you take advantage of this option as an applicant, the data transmitted to us may be processed electronically. These data include:

- First name, last name
- Contact details (e-mail address, telephone)
- Cover letter
- File attachment with the detailed application

Initially, the data will not be passed on to third parties in this context. However, if an applicant fits the profile of another job advertisement published by a company affiliated with us, we will be happy to forward the application documents. To do this, we will first obtain the applicant's consent. Otherwise, the data will be used exclusively for processing the application by the specialist department and for communication.

Purpose and legal basis for data processing

The data transmitted to us will be used exclusively for processing the application by the specialist department and for communication. The legal basis for processing the data is the contract initiation relationship or the conclusion of a contract. We will obtain consent before forwarding the application documents.

Duration of storage

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected, at the latest 6 months after rejection. In the case of a contractual relationship, we will delete the data received as soon as national, commercial law, statutory or contractual retention requirements have been fulfilled.



Possibility of objection

You have the option to object to the processing of your data at any time. To do so, please send an email to the office where you sent the application (the job advertiser).

Provision of the website and creation of log files

Each time our website is accessed, our system automatically collects data and information from the computer system of the accessing computer. The following data is collected:

- Information about the browser type and version used
- The operating system of the user
- The IP address of the user
- Date and time of access
- Websites from which the user's system accesses our website
- Websites that are accessed by the user's system via our website

The data is also stored in the log files of our system. This data is not stored together with other personal data of the user. Personal user profiles cannot be formed. The stored data is only evaluated for statistical purposes.

Purpose and legal basis for data processing

The temporary storage of the IP address by the system is necessary to enable delivery of the website to the user's computer. For this purpose, the user's IP address must remain stored for the duration of the session.

The storage in log files is done to ensure the functionality of the website. In addition, we use the data to optimise the website and to ensure the security of our information technology systems. An evaluation of the data for marketing purposes does not take place in this context.

The legal basis for the temporary storage of the data and the log files is the processing to protect our legitimate interest.

Duration of storage

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended.

In the case of storage of data in log files, this is the case after seven days at the latest. Storage beyond this period is possible. In this case, the IP addresses of the users are deleted or alienated so that an assignment of the calling client is no longer possible.

Possibility of objection and removal

The collection of data for the provision of the website and the storage of the data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility for the user to object.



Use of cookies and scripts

Cookies are small files that enable us to store specific information related to you, the user, on your computer while you are visiting one of our websites. Cookies help us to determine the frequency of use and the number of users of our website, as well as to make our offers as convenient and efficient as possible for you.

We also use cookies on our website that enable an analysis of the user's surfing behaviour. The following data can be transmitted in this way: Search terms entered, frequency of page views, use of website functions. The user data collected in this way is pseudonymised by technical precautions. Therefore, it is no longer possible to assign the data to the calling user. The data is not stored together with other personal data of the user. When accessing our website, the user is informed about the use of cookies for analysis purposes and his or her consent to the processing of personal data used in this context is obtained. In this context, a reference to this data protection declaration is also made.

Purpose and legal basis for data processing

The purpose of using technically necessary cookies is to simplify the use of websites for users. Some functions of our website cannot be offered without the use of cookies. For these, it is necessary that the browser is recognised even after a page change. The user data collected through technically necessary cookies are not used to create user profiles. The legal basis for the processing of personal data using technically necessary cookies is our legitimate interest in data processing.

The use of the analysis, tracking and/or advertising cookies or scripts is for the purpose of improving the quality of our website and its content and to place advertisements specifically tailored to the user. Through the analysis cookies, we learn how the website is used and can thus constantly optimise our offer. The legal basis for the processing of personal data using cookies for analysis purposes is the existence of a relevant consent of the user.

Duration of storage, possibility of objection and elimination

Cookies are stored on the user's computer and transmitted to our site by the user. Therefore, you as a user also have full control over the use of cookies. By changing the settings in your internet browser, you can deactivate or restrict the transmission of cookies. Cookies that have already been stored can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, it may no longer be possible to use all the functions of the website to their full extent.

Cookies used

Domain azimuthotels.com	Name _ga	Description This cookie name is linked to Google Univer- sal Analytics - an important update to Goog- le's more commonly used analytics service. This cookie is used to distinguish unique us- ers by assigning a randomly generated num- ber as a client ID. It is included in every page request in a website and used to calculate visitor, session and campaign data for web- site analytics reports. By default it expires after 2 years, although this can be adjusted	Storage period 2 years
		after 2 years, although this can be adjusted by website owners.	



azimuthotels.com	_gid	This cookie name is associated with Google Universal Analytics. This appears to be a new cookie and as of spring 2017 no infor- mation is available from Google. It appears to store and update a unique value for each page visited.	1 day
azimuthotels.com	azimuth_session	Not available	2 hours
azimuthotels.com	guestToken	Not available	5 years
azimuthotels.com	iwaf_fingerprint	Not available	1 day
azimuthotels.com	iwaf_scroll_event	Not available	1 day

Use of a cookie banner

We have integrated Comply Consent Manager on our website. Comply Consent Manager is a consent solution by Hendrik Paulo Gaffo & Alexander Riegert GbR, Carl-Bremer-Ring 13, 22179 Hamburg, Germany, which can be used to obtain and document consent to store cookies. Comply Consent Manager uses cookies or other web technologies to recognise users and store the consent given or revoked.

Purpose of the data processing

The use of the service is based on obtaining the legally required consent for the use of cookies in accordance with Art. 6 para. 1 lit. c. GDPR.

Duration of storage, possibility of objection and elimination

The concrete storage period of the processed data cannot be influenced by us, but is determined by Hendrik Paulo Gaffo & Alexander Riegert GbR. You can find further information in the <u>Privacy Policy</u> for Comply Consent Manager.

Comply API

We use Comply API from Hendrik Paulo Gaffo & Alexander Riegert GbR, Carl-Bremer-Ring 13, 22179 Hamburg, Germany, to access further services and data from Hendrik Paulo Gaffo & Alexander Riegert GbR. In doing so, a transmission of your IP address to Hendrik Paulo Gaffo & Alexander Riegert GbR takes place. Please note that there is a separate section in this privacy policy for each additional service we use from Hendrik Paulo Gaffo & Alexander Riegert GbR.

Purpose of the data processing

The use of Comply API is based on our legitimate interests, i.e. interest in optimising our online offer.

Duration of storage, possibility of objection and elimination

The concrete storage period of the processed data cannot be influenced by us, but is determined by Hendrik Paulo Gaffo & Alexander Riegert GbR. You can find further information in the <u>Privacy Policy</u> for Comply API.



Use of analysis and tracking tools

Google Analytics

We use Google Analytics from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, as an analysis service for the statistical evaluation of our online offer. This includes, for example, the number of views of our online offering, sub-pages visited and the length of stay of visitors.

Google Analytics uses cookies and other browser technologies to analyse user behaviour and recognise users. This information is used, among other things, to compile reports on website activity.

The information generated by the cookies about the use of this website by the users is usually transmitted to a Google server in the USA and stored there. In the event that IP anonymisation is activated on this website, however, the IP address of the user will be truncated beforehand by Google within Member States of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. IP anonymisation is active on this website.

On behalf of the operator of this website, Google will use this information for the purpose of evaluating the use of the website by users, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

Users may refuse the use of cookies by selecting the appropriate settings on their browser, however please note that if you do this you may not be able to use the full functionality of this website. Users may also prevent the collection of data generated by the cookie and relating to their use of the website (including their IP address) by Google and the processing of this data by Google by downloading and browser plug-in available installing the at the following link: http://tools.google.com/dlpage/gaoptout?hl=de . As an alternative to the browser add-on or within browsers on mobile devices, please click this link to prevent the collection of data by Google Analytics within this website in the future. This will place an opt-out cookie on your device. If you delete your cookies, you must click this link again.

We process data using Google Analytics for the purpose of optimising our website and for marketing purposes based on your consent.

The concrete storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the <u>privacy policy</u> for Google Analytics.

Use of other Google services

Google Tag Manager

We use Google Tag Manager provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Tag Manager is used to manage website tags via an interface and allows us to control the precise integration of services on our website. This allows us to flexibly integrate additional services to evaluate user access to our website.

The use of Google Tag Manager is based on our legitimate interests, i.e. interest in optimising our services.

The concrete storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the <u>privacy policy</u> for Google Tag Manager.



Use of social media services and plugins

The use of social media services and plugins is in the interest of an appealing presentation and expansion of our online offers. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR.

Facebook plugin

Plugins of the social network Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA are integrated on our pages. You can recognise the plugins by the logo on our page. You can find an overview of the plugins <u>here</u>.

We have no influence on the data collection and further processing by Facebook. Furthermore, it is not apparent to us to what extent, where and for how long the data is stored, to what extent Facebook complies with existing deletion obligations, what evaluations and links are made with the data and to whom the data is passed on. If you would like to avoid Facebook processing personal data that you have transmitted to us, please contact us by other means.

You can find more information on this in Facebook's <u>privacy policy</u>. If you do not want Facebook to be able to assign your visit to our pages to your user account, please log out of your respective user account!

Facebook fan page

We publish our Facebook fan page at: https://www.facebook.com/azimut.europe/. The provider of the social media platform is Facebook Inc., 1601 S. California Avenue, Palo Alto, CA 94304 in the USA.

By using the fan page, data is forwarded to the Facebook servers, which contain information about your visits to our fan page. For logged-in users, this results in the usage data being assigned to their personal Facebook account. As soon as you actively use the Facebook plugin as a logged-in Facebook user, e.g. by clicking on the "Facebook" logo or using the comment function, this data is transferred to your Facebook account and published. You can only avoid this by logging out of your Facebook account first.

We do not know exactly what data Facebook stores and uses. As a user of the fan page, you must therefore expect that Facebook also stores your actions on the fan page without gaps.

Otherwise, the <u>General Terms of Use of</u> Facebook Ireland Limited, Hanover Reach, 5-7 Hanover Quay, Dublin 2, Ireland apply.

The legal basis for this data processing is Art. 6 para. 1 lit. a, f) GDPR.

Every person depicted as well as other third parties have the possibility to object to the publication of their personal data (photos) at any time. We have set up the e-mail address <u>info.europe@azi-muthotels.de</u> for this purpose. The right to object applies in particular to the publication of pictures for the future.

It can always happen that we accidentally publish pictures of people where no consent has been given. If publication is not desired, we will immediately do everything possible to comply with your right. In the case of group pictures, we reserve the right to distort faces.

Instagram plugin

The "Instagram button" is used on this website. When you access this website, your browser establishes a connection to servers of the social network Instagram, offered by Instagram Inc, 1601 Willow Road, Menlo Park, CA, 94025, USA.

When you visit our pages, a direct connection is established between your browser and the Instagram server via the plugin. Instagram thereby receives the information that you have visited our site with your IP address. If you click the Instagram button while you are logged into your Instagram account,



you can link the content of our pages on your Instagram profile. This allows Instagram to associate the visit to our pages with your user account. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by Instagram.

For more information, please see Instagram's privacy policy.

Instagram fan page

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By using the fan page, data is forwarded to the Instagram servers, which contain information about your visits to our fan page. For logged-in users, this results in the usage data being assigned to their personal Instagram account. As soon as you actively use the Instagram plugin as a logged-in Instagram user, e.g. by clicking on the "Instagram" logo or using the comment function, this data is transferred to your Instagram account and published. You can only avoid this by logging out of your Instagram account first.

We do not know exactly what data Instagram stores and uses. As a user of the fan page, you must therefore expect that Instagram also stores your actions on the fan page without gaps.

The legal basis for this data processing is Art. 6 para. 1 lit. a, f) GDPR. You can find more information on this in Instagram's <u>privacy policy</u>.

Every person depicted as well as other third parties have the possibility to object to the publication of their personal data (photos) at any time. We have set up the e-mail address <u>info.europe@azi-muthotels.de</u> or this purpose. The right to object applies in particular to the publication of pictures for the future.

It can always happen that we accidentally publish pictures of people where no consent has been given. If publication is not desired, we will immediately do everything possible to comply with your right. In the case of group pictures, we reserve the right to distort faces.

Data processing outside the European Union

Insofar as personal data is processed outside the European Union, you can see this in the previous explanations.

Exercising your rights

If your personal data is processed, you are a data subject within the meaning of the GDPR and you have the following rights vis-à-vis the controller:

- You have a **right to information** about the personal data stored about you, about the purposes of processing, about any transfers to other bodies and about the duration of storage.
- If data is inaccurate or no longer necessary for the purposes for which it was collected, you may request that it be **corrected**, **erased** or **restricted** from processing. Where provided for in the processing procedures, you may also consult your data yourself and correct them if necessary.
- Should grounds against the processing of your personal data arise from your particular personal situation, you may, insofar as the processing is based on a legitimate interest, object to it. The controller shall no longer process the personal data concerning you unless it can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the purpose of asserting, exercising or defending legal claims.



• If the personal data concerning you is processed for the purpose of **direct marketing**, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing; this also applies to **profiling** insofar as it is related to such direct marketing. If you object to the processing for direct marketing or profiling purposes, the personal data concerning you will no longer be processed for these purposes.

You have the right to **revoke your declaration of consent under data protection law at any time**. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

If you have any questions about your rights and how to exercise them, please contact us or our data protection officer.

Your right to complain to a supervisory authority

As a data subject, without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a data protection supervisory authority, in particular in the Member State of your residence or of the place of the alleged infringement, if you consider that the processing of personal data relating to you infringes data protection.

The supervisory authority to which the complaint is submitted will inform you of the status and outcome of your complaint, including the possibility of a judicial remedy.

You can find more information on the website of the Federal Commissioner for Data Protection and Freedom of Information. Follow the <u>link</u>.

Protection of minors

This service is mainly aimed at adults. We do not currently market any specific areas for children. Accordingly, we do not knowingly collect age-identifying information, nor do we knowingly collect personal information from children under the age of 16. However, we caution all visitors to our website under the age of 16 not to disclose or provide any personally identifiable information through our service. In the event that we discover that a child under the age of 16 has provided us with personal information, we will delete the child's personal information from our files to the extent technically feasible.

Security

AZIMUT Hotels uses technical and organisational security measures in accordance with Art. 32 GDPR in order to protect the data we have under our control against accidental or intentional manipulation, loss, destruction or against access by unauthorised persons. Our security measures are continuously improved in line with technological developments. Access is only possible for a few authorised persons and persons who are obliged to provide special data protection and who are involved in the technical, administrative or editorial care of data.

Amendment of this data protection notice

We revise this data protection notice when changes are made to this website or on other occasions that make this necessary. You will always find the current version on this website.

Status | June 2022