

# Information on Data Processing in Accordance with Articles 13, 14 GDPR

These data processing information apply to the online offering of Classik Hotel Collection GmbH, which is accessible under the domain [www.classik-hotel-collection.com](http://www.classik-hotel-collection.com) as well as the various subdomains ("our website"). In addition, we would also like to inform you how we store and use personal data that we have obtained via other channels.

Classik Hotel Collection GmbH is guided in particular by the EU General Data Protection Regulation (GDPR) as well as the current Federal Data Protection Act (BDSG). When using the internet, we protect your personal data in accordance with the Telecommunications Digital Services Data Protection Act (TDDDG) of the Federal Republic of Germany. Below we explain which information we collect during your visit to our websites and how it is used.

Who is responsible and how can I reach you?

Controller

for the processing of personal data within the meaning of the EU General Data Protection Regulation (GDPR)

Classik Hotel Collection GmbH, Rosenstraße 1 | D-10178 Berlin

Tel +49 (0)30 24 00 17 63, email [info@classik-hotel-collection.de](mailto:info@classik-hotel-collection.de)

Data Protection Officer

Data Solution LUD GmbH

Kay Kühnel

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What is this about?

This privacy policy meets the legal requirements for transparency in the processing of personal data. This includes all information relating to an identified or identifiable natural person. This includes, for example, information such as your name, your age, your address, your telephone number, your date of birth, your email address, your IP address, or user behavior when visiting a website. Information for which we cannot establish any connection to your person (or only with disproportionate effort), e.g. through anonymization, is not personal data. The processing of personal data (e.g. collection, querying, use, storage, or transmission) always requires a legal basis and a defined purpose.

Stored personal data will be deleted as soon as the purpose of processing has been achieved and there are no lawful reasons for further retention of the data. We inform you about the specific retention periods and/or criteria for storage within the individual processing operations.

Independently of this, we store your personal data in individual cases to assert, exercise, or defend legal claims and where statutory retention obligations exist.

General information on data processing

We generally collect and use personal data only to the extent necessary to provide a functional website and our content and services, or where we collect and process 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 bases:

- Where we obtain the consent of the data subject for processing operations involving personal data, Art. 6(1)(a) GDPR serves as the legal basis.
- Where the processing of personal data is necessary for the performance of a contract to which the data subject is party, Art. 6(1)(b) GDPR serves as the legal basis. This also applies to processing operations necessary to carry out pre-contractual measures.
- Where processing of personal data is necessary to comply with a legal obligation (statutory provisions) to which our company is subject, Art. 6(1)(c) GDPR serves as the legal basis.
- Where processing is necessary to safeguard a legitimate interest of our company or a third party and the interests, fundamental rights, and freedoms of the data subject do not override the former interest, Art. 6(1)(f) GDPR serves as the legal basis for processing.

In connection with the respective processing, we will refer to the relevant terminology so that you can understand on which basis we process personal data.

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

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

#### Data deletion and storage duration

The personal data of the data subject will be deleted or blocked as soon as the purpose of storage no longer applies. Storage may also take place if this has been provided for by the European or national legislator in Union law regulations, laws, or other provisions to which the controller is subject. Data will also be blocked or deleted when a storage period prescribed by the aforementioned standards expires, unless further storage of the data is necessary for the conclusion of a contract or for contract performance.

#### Who receives your data?

We only pass on your personal data that we process on our website to third parties if this is necessary for the fulfillment of the purposes and is covered in the individual case by the legal basis (e.g. consent or safeguarding legitimate interests). In addition, in individual cases we pass on personal data to third parties if this serves the assertion, exercise, or defense of legal claims.

Possible recipients may then include, for example, law enforcement authorities, lawyers, auditors, courts, etc.

Where we use service providers for the operation of our website who process personal data on our behalf as part of processing under Art. 28 GDPR, these may be recipients of your personal data. More detailed information on the use of processors and web services can be found in the overview of the individual processing operations.

#### Collection, processing, and use of personal data at Classik Hotel Collection

The subject of the hotel group is the operation of several hotels in Germany with joint responsibility. Data collection, processing, and use is carried out to perform the stated purpose.

Classik Hotel Collection, Rosenstraße 1, D-10178 Berlin is the responsible entity for carrying out central reservations. To improve our services, we manage all data received within the hotel group in our central hotel software. The responsible entity is the hotel at which the booking is made. The respective booking data can only be viewed by the responsible entity; the jointly used access relates to the master data of a guest in order, for example, to make a reservation for another hotel at a later point in time, to rebook, or to carry out centralized marketing activities. Central services such as reservations and marketing access this data for this purpose. The legal basis for processing the data is our legitimate interest in data processing within the scope of centralized administration and use of the data of our customers and business partners within the hotel group.

Guest contact details may be used at a later point in time for advertising purposes. Advertising activities primarily include mailings. Use of the email address requires the guest's consent.

Processing of your data for purposes other than those stated will only take place insofar as such processing is permitted under Art. 6(4) GDPR and is compatible with the original purposes of the contractual relationship. We will inform you about such processing before any further processing of your data.

#### Legal basis for data processing

The legal basis for processing the data is the conclusion of an accommodation contract with the guest. The transmitted data are stored in our hotel software and used for contract performance.

#### Categories of data subjects, data and data categories:

To fulfill the stated purpose, the following categories of personal data are collected, processed, and used:

- Guest data (in particular first and last name, address data, contact data, reservation data, guest requests, billing data)
- Other customer data (in particular address data, billing and service data)
- Prospect data (in particular accommodation interest, address data)

#### Recipients to whom the data may be disclosed:

Data may be disclosed to the following recipients:

- Internal departments involved in the execution and fulfillment of the respective business processes (e.g. hotels of the hotel group, central reservations, accounting, sales & marketing, IT organization)
- Public bodies that receive data on the basis of legal provisions (e.g. law enforcement authorities,

public-sector authorities)

• External contractors pursuant to Art. 28 GDPR (service companies)

• Further external bodies (e.g. banks, companies, provided data subjects have declared written consent or transmission is permissible due to overriding legitimate interest)

#### Purpose of data processing

The main purpose of collecting, processing, or using personal data is the administration, care, and hospitality for guests within the scope of the accommodation contract.

#### Storage duration

The legislator has enacted numerous retention obligations and periods. After expiry of these periods, the corresponding data and records are routinely deleted or anonymized if they are no longer required for contract performance. For example, commercial-law or financially relevant data of a completed business year are deleted after a further ten years in accordance with legal requirements, unless longer retention periods are prescribed or required for legitimate reasons. Reservation documents may be destroyed after 6 years; the special registration form after one year after the end of the year.

#### Right to object

You have the option at any time to object to the processing of your data. For this purpose, we have set up the email address [widerruf@classik-hotel-collection.com](mailto:widerruf@classik-hotel-collection.com).

#### Processing of personal data of domestic guests during online check-in

To process the accommodation contract, the collection and storage of the following personal data is required from you as a domestic guest during hotel check-in:

- Date of arrival and expected departure (for planning and organizing your stay)
- Surname and first name(s) (for identification and contact)
- Email address (to participate in the online check-in/out process to simplify and accelerate the check-in and check-out process, to confirm your booking and transmit relevant information about your reservation, to send your invoice after the end of your stay)
- Address (for contact and invoicing)
- Data for identification, unless you initiate a card-based payment process with strong customer authentication (Strong Customer Authentication or “SCA”), in which the purpose-specific assignment number of the payment instrument used is collected. In this case, the purpose-specific assignment number of the payment instrument used is stored together with the above-mentioned data.
- State law may determine that further data may be collected on the registration form for the collection of visitor's tax and spa contributions (fulfillment of the requirements of tourism and spa administrations).

Strong customer authentication is a requirement of the EU Payment Services Directive PSD2, ensuring that online payments are secure and reducing fraud. It requires users to confirm their identity during payments using two out of three factors—knowledge (something only the user knows, e.g. a password), possession (something only the user has, e.g. a smartphone), and inherence (something that characterizes the user, e.g. a fingerprint).

If you use the option of online check-in, this takes place via the Guestline platform of Guestline GmbH, Agnes-Pockels-Bogen 1, 80992 Munich, Germany. Guestline is committed to handling your transmitted data in compliance with data protection requirements and takes all organizational and technical measures to protect your data. Please refer to Guestline's privacy policy for further information on data protection.

In the course of using the software, personal data are processed. These may include the following personal data:

#### Login

- Surname
- Reservation number

In addition, further information regarding the reservation can be provided in the personal check-in area:

- Master and communication data (e.g. first and last name, email address)
- Address data (e.g. street, house number, postal code, city, country)
- Booking/travel data (e.g. arrival and departure date, booking number, room number)
- Usage data (e.g. start, duration and end of use, feature used, language used, browser and operating system used)
- Geo data (e.g. GPS position)

Not every one of the above-mentioned data categories is collected or requested with every use of the software. This depends on the settings we have individually configured and/or which services we use. Use of the software is generally possible without user registration.

#### Legal basis for data processing

The processing of your personal data is generally carried out for the performance of the accommodation contract. The legal basis for processing the email address—if we have received it from you in advance or have already stored it from a previous stay—is additionally our legitimate interest in data processing. Our legitimate interest lies in improving our service offering by simplifying processes and digital communication.

We would like to use your personal data collected during online check-in to supplement your data for contract performance in our hotel software. In addition, the data may be used—if provided for—to open the room door in our hotel via an app. A system-based check is carried out to determine whether you are authorized to request or use a provided service.

Where we are legally obliged to collect and store personal data (e.g. registration law), we base processing on compliance with a legal obligation.

#### Purpose of data processing

By contacting you, we would like to give you as a guest the opportunity to receive information prior to your upcoming stay and to give you the option to check in in advance and complete the electronic registration form.

#### Categories of recipients

- Guestline as the software provider and its sub-processors, e.g. for hosting, SMS, email distribution and, if applicable, provision of a chatbot.
- Other service providers commissioned by us, e.g. hotel reservation system, door system, chatbot, operations & communication software, etc.
- Payment service providers
- Further external bodies, insofar as the data subject has given consent or transmission is permissible due to overriding interests.
- Public bodies in the event of statutory obligations.

In the event of a legal obligation, we reserve the right to disclose information about you if we are required to do so by lawfully acting authorities or law enforcement bodies. The legal basis is Art. 6(1)(c) GDPR (legal obligation).

#### Storage duration

The data are automatically deleted after 15 months.

#### Right to object

You have the option at any time as a recipient to object to the processing of your data. For this purpose, we have set up the email address [widerruf@classik-hotel-collection.com](mailto:widerruf@classik-hotel-collection.com).

#### Processing of personal data of foreign guests during online check-in

To process the accommodation contract and due to legal obligations arising from the Federal Registration Act (Bundesmeldegesetz), the collection and storage of the following personal data is required from you as a foreign guest during hotel check-in:

- Date of arrival and expected departure (for planning and organizing your stay as well as fulfilling the requirement under the Federal Registration Act)
- Names and first names (for identification and contact as well as fulfilling the requirement under the Federal Registration Act)
- Date of birth (fulfillment of the requirement under the Federal Registration Act)
- Nationalities (fulfillment of the requirement under the Federal Registration Act)
- Address (for identification, invoicing and, if applicable, contact as well as fulfilling the requirement under the Federal Registration Act)
- Data for identification, unless you initiate a card-based payment process with strong customer authentication (Strong Customer Authentication or “SCA”), in which the purpose-specific assignment number of the payment instrument used is collected. In this case, the purpose-specific assignment number of the payment instrument used is stored together with the above-mentioned data.
- Number of accompanying foreign travelers and their nationality (fulfillment of the requirement under the Federal Registration Act)
- Serial number of the recognized and valid passport or passport substitute document (identity document) (fulfillment of the requirement under the Federal Registration Act)
- State law may determine that further data may be collected on the registration form for the

collection of visitor's tax and spa contributions (fulfillment of the requirements of tourism and spa administrations)

The information on the registration form is compared with the information on your identity document. If discrepancies arise, this is noted on the registration form. If you do not present an identity document or do not present a valid identity document, this is also noted on the registration form.

Strong customer authentication is a requirement of the EU Payment Services Directive PSD2, ensuring that online payments are secure and reducing fraud. It requires users to confirm their identity during payments using two out of three factors—knowledge (something only the user knows, e.g. a password), possession (something only the user has, e.g. a smartphone), and inherence (something that characterizes the user, e.g. a fingerprint).

If you use the option of online check-in, this takes place via the Guestline platform of Guestline GmbH, Agnes-Pockels-Bogen 1, 80992 Munich, Germany. Guestline is committed to handling your transmitted data in compliance with data protection requirements and takes all organizational and technical measures to protect your data. Please refer to Guestline's privacy policy for further information on data protection.

In the course of using the software, personal data are processed. These may include the following personal data:

Login

- Surname
- Reservation number

In addition, further information regarding the reservation can be provided in the personal check-in area:

- Master and communication data (e.g. first and last name, email address)
- Address data (e.g. street, house number, postal code, city, country)
- Booking/travel data (e.g. arrival and departure date, booking number, room number)
- Registration form data (e.g. nationality, date of birth, passport number, digital signature)
- Invoice data (e.g. billing address, prices, booked services (e.g. parking, gym))
- Usage data (e.g. start, duration and end of use, feature used, language used, browser and operating system used)
- Geo data (e.g. GPS position)

Not every one of the above-mentioned data categories is collected or requested with every use of the software. This depends on the settings we have individually configured and/or which services we use. Use of the software is generally possible without user registration.

Legal basis for data processing

The processing of your personal data is generally carried out for the performance of the accommodation contract. The legal basis for processing the email address—if we have received it from you in advance or have already stored it from a previous stay—is additionally our legitimate interest in data processing. Our legitimate interest lies in improving our service offering by simplifying processes and digital communication.

We would like to use your personal data collected during online check-in to supplement your data for contract performance in our hotel software. In addition, the data may be used—if provided for—to open the room door in our hotel via an app. A system-based check is carried out to determine whether you are authorized to request or use a provided service.

Where we are legally obliged to collect and store personal data (e.g. registration law), we base processing on compliance with a legal obligation.

Purpose of data processing

By contacting you, we would like to give you as a guest the opportunity to receive information prior to your upcoming stay and to give you the option to check in in advance and complete the electronic registration form.

Categories of recipients

- Guestline as the software provider and its sub-processors, e.g. for hosting, SMS, email distribution and, if applicable, provision of a chatbot.
- Other service providers commissioned by us, e.g. hotel reservation system, door system, chatbot, operations & communication software, etc.
- Payment service providers
- Further external bodies, insofar as the data subject has given consent or transmission is

permissible due to overriding interests.

- Public bodies in the event of statutory obligations.

In the event of a legal obligation, we reserve the right to disclose information about you if we are required to do so by lawfully acting authorities or law enforcement bodies. The legal basis is Art. 6(1)(c) GDPR (legal obligation).

Storage duration

The data are automatically deleted after 15 months.

Right to object

You have the option at any time as a recipient to object to the processing of your data. For this purpose, we have set up the email address [widerruf@classik-hotel-collection.com](mailto:widerruf@classik-hotel-collection.com).

Your stay at the hotel

During your stay at our hotel, we collect and process information about guests in our hotel software.

Data from the following groups of persons may be stored:

- Guests, business partners, companies
- Prospects and potential prospects (e.g. in the case of inquiries about offers)

Stored data may include:

- First and last name
- Date of birth
- Contact details (telephone, email address)
- Address
- Nationality
- Company
- ID and passport data
- Data on service benefits
- Billing data
- Data on payment processing (e.g. credit card data)
- Video recordings for collecting evidence in cases of vandalism, burglary, robbery, or other criminal offenses

If you made the booking via a hotel portal, a tour operator, or a travel agency, your data are forwarded to us by these providers for the fulfillment of the concluded contract.

Purposes and legal basis of data processing

We use the personal data you provide exclusively to fulfill the agreed contractual services, i.e. the administration, care, and hospitality for guests within the scope of the accommodation contract.

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

Hotels are obliged under registration law provisions (§ 29 et seq. Federal Registration Act) to have their guests complete a registration form on site or online. This contains, in addition to first and last name and address, information about date of birth, nationality, and accompanying family members. For foreign guests, we must also request an ID number. All other information is voluntary.

If services are used, generally only those data are collected that are required to provide the services. If more extensive data are collected, these are voluntary information. The processing of personal data takes place exclusively to fulfill the requested services and to safeguard our own legitimate business interests pursuant to Art. 6(1)(f) GDPR.

Data are used for the following purposes:

- Registration on arrival and departure incl. completion of the registration form
- Issuing the room key card for you and accompanying travelers
- Provision of requested services
- Handling payment modalities
- Storage of preferences for future hotel stays

Guest contact details may be used at a later point in time for advertising purposes. Use of the email address requires your consent.

Processing of data for purposes other than those stated will only take place insofar as such processing is permitted under Art. 6(4) GDPR and is compatible with the original purposes of the contractual relationship. We will inform you about such processing before any further processing of your data.

Recipients to whom the data may be disclosed:

- Public bodies that receive data on the basis of legal provisions (e.g. law enforcement authorities, public-sector authorities)
- Internal departments involved in the execution and fulfillment of the respective business processes (e.g. administration, accounting, sales & marketing, IT organization)
- Affiliated hotels (master data in the PMS)
- External contractors pursuant to Art. 28 GDPR (service companies)
- Further external bodies (e.g. banks)

Deletion of data

The legislator has enacted numerous retention obligations and periods. After expiry of these periods, the corresponding data and records are routinely deleted if they are no longer required for contract performance. For example, commercial-law or financially relevant data of a completed business year are deleted after a further ten years in accordance with legal requirements, unless longer retention periods are prescribed or required for legitimate reasons. Reservation documents may be destroyed after 6 years; the registration form after one year after the end of the quarter. If data are not affected by this, they are deleted without prompting when the stated purposes no longer apply.

Video recordings are stored for 72 hours.

Right to object

You have the option at any time to object to the processing of your data. For this purpose, we have set up the email address [widerruf@classik-hotel-collection.com](mailto:widerruf@classik-hotel-collection.com).

Online booking via the website

On our website, there is the option to book hotel rooms and arrangements. If a user makes use of this option, the data entered in the input form are transmitted to us and stored. These data are: First name, last name, email address, telephone, address, number of accompanying travelers, expected arrival time, requests, payment data (credit card), date, time.

If you make an online booking via our websites, this is done through the online reservation system of Guestline GmbH, Agnes-Pockels-Bogen 1, 80992 Munich, Germany. All booking data you enter are transmitted in encrypted form. The service provider is committed to handling your transmitted data in compliance with data protection requirements. It takes all organizational and technical measures to protect your data.

In this context, there is no further disclosure of the data to third parties. The data are used exclusively to process the booking and for communication.

Legal basis for data processing

The legal basis for processing the data is the conclusion of an accommodation contract with the user.

Purpose of data processing

Processing of the personal data from the input form serves solely to process the booking inquiry and to handle payment transactions.

Storage duration

The data are deleted as soon as they are no longer required to achieve the purpose for which they were collected. In the case of a contractual relationship, we will delete the data received as soon as national, commercial-law, statutory, or contractual retention provisions have been fulfilled.

Right to object

You have the option at any time to object to the processing of your data. For this purpose, we have set up the email address [widerruf@classik-hotel-collection.com](mailto:widerruf@classik-hotel-collection.com). We point out that in the event of an objection, the booking cannot be completed and/or the conversation cannot be continued.

Online booking via other websites

We offer interested parties the opportunity to book rooms and arrangements for the hotel via hotel reservation portals (third-party providers). If a user makes use of this option, the data entered in the input form are transmitted to us and stored to the extent permitted by the respective hotel reservation portal in accordance with its own privacy policies. Data may include: First name, last name, email address, telephone, address, number of accompanying travelers, expected arrival time, requests, payment data (credit card).

The provided data are transferred to our hotel software via a so-called channel manager. All received booking data are transmitted in encrypted form. For this purpose, we use the channel

manager of HotelNetSolutions GmbH, Genthiner Str. 8, 10785 Berlin, Germany. This provider is committed to handling the transmitted personal data in compliance with data protection requirements. It takes all organizational and technical measures to protect your data.

In this context, there is no further disclosure of the data to third parties. The data are used exclusively to process the booking and, where applicable, for communication.

#### Legal basis for data processing

The legal basis for processing the data is the conclusion of an accommodation contract with the user.

#### Purpose of data processing

Processing of the personal data from the input form serves solely to process the booking inquiry and to handle payment transactions.

#### Storage duration

The data are deleted as soon as they are no longer required to achieve the purpose for which they were collected. In the case of a contractual relationship, we will delete the data received as soon as national, commercial-law, statutory, or contractual retention provisions have been fulfilled.

We have no influence over the storage periods at the respective hotel reservation portal.

#### Right to object

You have the option at any time to object to the processing of your data. For this purpose, we have set up the email address [widerruf@classik-hotel-collection.com](mailto:widerruf@classik-hotel-collection.com). We point out that in the event of an objection, the booking cannot be completed and/or the conversation cannot be continued.

#### Online review

Former guests can submit a review of our hotel after check-out. For this purpose, we would like to send you an email within 14 days after departure to ask you to submit a hotel review. Each review can be published anonymously upon request. If you did not feel comfortable in our hotel, we would like to take the opportunity to contact you.

When we send these emails, this is done via our service provider TrustYou GmbH, Agnes-Pockels-Bogen 1, 80992 Munich, Germany. The service provider is committed to handling your transmitted data in compliance with data protection requirements. It takes all organizational and technical measures to protect your data.

If a former guest makes use of the option of an online review, data are stored by the former guest in the review form. These data are: email address as well as voluntary information such as first name, last name, language, and the review information.

In this context, there is no further disclosure of the data to third parties. The data are used exclusively for publishing the review and for mediation in the event of negative reviews.

#### Legal basis for data processing

The legal basis for processing the data is, moreover, our legitimate interest in data processing.

#### Purpose of data processing

The purpose of the hotel review is to communicate and summarize opinions of hotel guests on our website so that interested parties can form their own impression of our services and offerings. In addition, the results serve our internal quality management.

#### Storage duration

The data are not deleted.

#### Right to object

There is the option at any time to have the publication of the review deleted (right to be forgotten). For this purpose, we have set up the email address [widerruf@classik-hotel-collection.com](mailto:widerruf@classik-hotel-collection.com). Please let us know which review it concerns.

#### Email contact

It is possible to contact our employees via the provided email addresses. If you make use of this option, the personal data transmitted with the email are stored in our email system.

#### Legal basis for data processing

The legal basis for processing the data is initially our legitimate interest in data processing within the scope of contact initiated by the inquiring party. If the contact aims at concluding a contract, the additional legal basis for processing within the scope of a contractual relationship applies.

#### Purpose of data processing

Processing of the personal data serves solely to handle the contact and conversation.

#### Storage duration

The data are deleted as soon as they are no longer required to achieve the purpose for which they were collected. For personal data sent by email, this is the case when the respective conversation has ended. The conversation is considered ended when it can be inferred from the circumstances that the matter in question has been conclusively clarified.

#### Right to object

You have the option at any time to object to the processing of your data. For this purpose, we have set up the email address [widerruf@classik-hotel-collection.com](mailto:widerruf@classik-hotel-collection.com). We point out that in the event of an objection, the conversation cannot be continued and/or we cannot prepare offers, etc. All personal data stored in the course of the contact will be deleted in this case.

#### Business customers

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

#### Purpose and legal basis for data processing

We use these contact details exclusively for our own purposes and to tailor our sales activities to needs. The legal basis for processing the data is our legitimate interest in data processing. If the contact aims at concluding a contract, the additional legal basis for processing is the business initiation relationship and/or contractual relationship. To improve our services, we manage all data received in the CRM module of our central hotel software. In this context, no data are passed on to third parties.

#### Storage duration

In principle, no deletion period is предусмотрен. However, if our sales department has had no contact with the company contact for 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 inquiry), the transmitted data are additionally stored in our hotel software and used for contract performance. If no contractual relationship is formed, we delete the data after one year at the end of the year.

#### Right to object

As a company contact, you have the option at any time to object to the processing of your data. For this purpose, we have set up the email address [widerruf@classik-hotel-collection.com](mailto:widerruf@classik-hotel-collection.com). All personal data of the contact person stored for the business partner will be deleted in this case.

#### Your application for a job posting

It is possible to apply via online portals such as Hotelcareer or directly for advertised positions. If you as an applicant make use of this option, the data transmitted to us can be processed electronically. These data include, among others:

- First name, last name
- Contact details (email address, telephone)
- Cover letter
- File attachment with the full application

In this context, there is initially no further disclosure of the data to third parties. However, if an applicant fits the profile of another job posting published by an affiliated company, we are happy to forward the application documents. We will obtain the applicant's consent in advance for this purpose. Otherwise, the data are used exclusively to process the application by the specialist department and for communication.

#### Purpose and legal basis for data processing

The data transmitted to us are used exclusively to process the application by the specialist department and for communication. The legal basis for processing the data is the initiation of a contract and/or the conclusion of a contract. For forwarding the application documents, we will obtain consent in advance.

#### Storage duration

The data are deleted as soon as they are no longer required to achieve the purpose for which they were 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 provisions have been fulfilled.

#### Right to object

You have the option at any time to object to the processing of your data. For this, please send an email to the location to which you sent the application (advertising location).

#### Data processing outside the European Union

Insofar as personal data are processed outside the European Union, you can see this from the preceding explanations.

#### Protection of minors

This service is aimed mainly at adults. We currently do not market special areas for children. Accordingly, we neither knowingly collect information to determine age nor knowingly collect personal data from children under 16 years of age. However, we instruct all visitors to our website under 16 years of age not to disclose or provide personal data via our service. If we determine that a child under 16 has provided us with personal data, we will delete that child's personal data from our files insofar as technically possible.

#### What rights do you have?

If personal data are processed by you, 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 of access to the personal data stored about you, the purposes of processing, any transfers to other bodies, and the duration of storage.
- If data are incorrect or no longer necessary for the purposes for which they were collected, you can request rectification, erasure, or restriction of processing. If provided for in the processing procedures, you can also view your data yourself and, if necessary, correct it.
- If reasons arise from your particular personal situation that argue against the processing of your personal data, you can object insofar as the processing is based on a legitimate interest. The controller will then 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 establishment, exercise, or defense of legal claims.
- If the personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to the processing of the personal data concerning you for such advertising; this also applies to profiling insofar as it is related to such direct advertising. If you object to 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 withdraw your data protection consent declaration at any time. The withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent up to the time of withdrawal.

If you have questions about your rights and exercising them, please contact management or the Data Protection Officer.

#### Your right to lodge a complaint with 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 habitual residence or the place of the alleged infringement, if you consider that the processing of personal data concerning you violates the GDPR.

The supervisory authority with which the complaint has been lodged will inform you of the status and the outcome of the complaint, including the possibility of a judicial remedy.

More information can be found on the website of the Federal Commissioner for Data Protection and Freedom of Information. Follow the link

[https://www.bfdi.bund.de/DE/Service/Kontakt/Beschwerdeformular/Info\\_OnlineBeschwerde.html](https://www.bfdi.bund.de/DE/Service/Kontakt/Beschwerdeformular/Info_OnlineBeschwerde.html).

#### Security

We implement technical and organizational security measures in accordance with Art. 32 GDPR to protect the data we manage against accidental or intentional manipulation, loss, destruction, or unauthorized access. Our security measures are continuously improved in line with technological developments. Access is only permitted to a few authorized persons who are under special data protection obligations and are involved in the technical, administrative, or editorial management of data.

For security reasons and to protect the transmission of confidential content that you send to us as the website operator, our website uses SSL/TLS encryption. This means that data you transmit via

this website cannot be read by third parties. You can recognize an encrypted connection by the "https://" address line in your browser and the lock symbol in the browser line.

How are your data processed on the website in detail?

Below we inform you about the individual processing operations, the scope and purpose of data processing, the legal basis, the obligation to provide your data, and the respective storage period. There is no automated decision-making in individual cases, including profiling.

Do we use cookies?

Cookies are small text files that are sent by us to your browser on your device during your visit to our websites and stored there. As an alternative to cookies, information may also be stored in the local storage of your browser. Some functions of our website cannot be offered without the use of cookies and/or local storage (technically necessary cookies). Other cookies, however, enable us to carry out various analyses, so that, for example, we are able to recognize the browser you use when you visit our website again and to transmit various information to us (non-essential cookies). With the help of cookies, we can, among other things, make our website more user-friendly and effective for you by, for example, tracking your use of our website and determining your preferred settings (e.g. country and language settings). If third parties process information via cookies, they collect the information directly via your browser. Cookies do not cause any damage to your device. They cannot execute programs and do not contain viruses.

We inform you about the respective services for which we use cookies in the individual processing operations. Detailed information about the cookies used can be found in the cookie settings or in the consent manager of this website.

Cookies used

Domain Name Description Storage duration

classik-hotel-collection.com \_ga This cookie name is associated with Google Universal Analytics—an important update for Google's more widely used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client ID. It is included in each page request in a website and used to calculate visitor, session, and campaign data for the website's analytics reports. By default, it expires after 2 years, although this can be customized by website owners. approx. 1 year

classik-hotel-collection.com \_ga\_MWGN27D3MH \_Los approx. 1 year

classik-hotel-collection.com \_gat\_UA-178155533-1 This is a pattern-type cookie set by Google Analytics, where the pattern element in the name contains the unique identity number of the account or website to which it relates. It appears to be a variation of the \_gat cookie used to limit the amount of data recorded by Google on high-traffic websites. 5 minutes

classik-hotel-collection.com \_gcl\_au Used by Google AdSense to experiment with the efficiency of advertising on websites using its services approx. 3 months

classik-hotel-collection.com \_gid This cookie name is associated with Google Universal Analytics. This appears to be a new cookie and, since spring 2017, no information has been available from Google. It appears to store and update a unique value for each page visited. approx. 1 day

classik-hotel-collection.com \_lscache\_vary This \_lscache\_vary cookie is used to store whether a user is logged in on the website and which user role they have, to prevent caching of pages for logged-in users and to improve browsing speed for non-logged-in users by providing cached content. approx. 2 days

classik-hotel-collection.com \_wpfuuid This cookie is used by WordPress to identify a unique user ID and improve website functionality through a better user experience. approx. 1 year

bidr.io bito This cookie is typically provided by bidr.io and used for advertising purposes. approx. 1 year

bidr.io bitolsSecure Not available approx. 1 year

bidr.io checkForPermission Not available 14 minutes

classik-hotel-collection.com ds-csrf Not available approx. 7 days

triptease.io triptease-session-id Not available 8 hours

triptease.io triptease-user-id Not available approx. 1 year

triptease.io tt-bee-beeswax-id Not available approx. 1 year

Provision of the website

When accessing and using our website, we collect the personal data that your browser automatically transmits to our server. The following information is temporarily stored in a so-called log file:

- IP address of the requesting computer
- Date and time of access
- Name and URL of the retrieved file

- Website from which access is made (referrer URL)
- Browser used and, if applicable, the operating system of your computer, as well as the name of your access provider

Our website is not hosted by us, but by a service provider who processes the aforementioned data in our order for the stated purpose in accordance with Art. 28 GDPR.

#### Purpose and legal basis

Processing is carried out to safeguard our overriding legitimate interest in displaying our website and ensuring security and stability on the basis of Art. 6(1)(f) GDPR. The collection of data and storage in log files is absolutely necessary for operation of the website. A right to object to processing does not exist due to the exception under Art. 21(1) GDPR. Insofar as further storage of the log files is required by law, processing is carried out on the basis of Art. 6(1)(c) GDPR. There is no statutory or contractual obligation to provide the data; however, accessing our website without providing the data is technically not possible.

#### Storage duration

The aforementioned data are stored for the duration of displaying the website and, for technical reasons, beyond that for a maximum of 7 days.

#### Contact form

On our website we offer you the opportunity to contact us via a provided form. The information collected via mandatory fields is required in order to process the request. In addition, you can voluntarily provide additional information which, in your view, is necessary to process the contact request.

When using the contact form, your personal data are not passed on to third parties.

#### Purpose and legal basis

Processing of your data through use of our contact form is carried out for the purpose of communication and handling your request on the basis of your consent pursuant to Art. 6(1)(a) GDPR. If your request relates to an existing contractual relationship with us, processing is carried out for the purpose of contract performance on the basis of Art. 6(1)(b) GDPR. There is no statutory or contractual obligation to provide your data; however, processing your request is not possible without providing the information in the mandatory fields. If you do not wish to provide these data, please contact us by other means.

#### Storage duration

If you use the contact form on the basis of your consent, we store the data collected for each request for a period of three years, starting from completion of your request or until you withdraw your consent.

If you use the contact form within the scope of a contractual relationship, we store the data collected for each request for a period of [three years] from the end of the contractual relationship.

#### Presence on social media platforms

We maintain so-called fan pages/accounts or channels on the networks listed below in order to provide you with information and offers within social networks as well, and to offer you additional ways to contact us and learn about our offers. Below we inform you about which data we and/or the respective social network process from you in connection with accessing and using our fan pages/accounts.

#### Data we process from you

If you wish to contact us via messenger or direct message via the respective social network, we generally process your username with which you contact us and may store further data communicated by you insofar as this is necessary to process/answer your request.

Legal basis is Art. 6(1) sentence 1(f) GDPR (processing is necessary for (Static) usage data that we receive from the social networks

We receive automatically provided statistics regarding our accounts via insights functionalities. The statistics include, among other things, the total number of page views, likes, information about page activities and post interactions, reach, video views/plays, as well as information about the proportion of men/women among our fans/followers.

The statistics contain only aggregated data that cannot be related to specific individuals. We cannot identify you from them.

Which data the social networks process from you

To view the content of our fan pages/accounts, you do not have to be a member of the respective social network and no user account is required for the respective social network.

Please note, however, that when accessing the respective social network, the social networks also collect and store data from website visitors without a user account (e.g. technical data to display the website) and use cookies and similar technologies, over which we have no influence. Details can be found in the privacy policies of the respective social network (see the corresponding links above).

If you want to interact with the content on our fan pages/accounts, e.g. comment on, share, or like our posts/contributions and/or contact us via messenger functions, prior registration with the respective social network and the provision of personal data are required.

We have no influence on the data processing by the social networks within the scope of your use. To our knowledge, your data are stored and processed by the social networks in particular in connection with providing the respective services, as well as for analysis of usage behavior (using cookies, pixels/web beacons and similar technologies), on the basis of which interest-based advertising is displayed both within and outside the respective social network. It cannot be ruled out that your data may also be stored by the social networks outside the EU/EEA and passed on to third parties.

Information on the exact scope and purposes of processing of your personal data, storage duration/deletion, and guidelines on the use of cookies and similar technologies as part of registration and use of the social networks can be found in the privacy policies/cookie policies of the social networks. There you will also find information about your rights and options to object.

Facebook page

When visiting our Facebook page, Facebook (Meta) records, among other things, your IP address and further information that is present in the form of cookies on your PC. This information is used to provide us as the operator of the Facebook pages with statistical information about the use of the Facebook page. Facebook provides more information via the following link:

<https://facebook.com/help/pages/insights>.

Using the transmitted statistical information, it is not possible for us to draw conclusions about individual users. We use these only to respond to the interests of our users and to continuously improve our online presence and ensure its quality.

We collect your data via our fan page solely in order to enable communication and interaction with us. This collection generally includes your name, message content, comment content, and the profile information you provide "publicly".

Processing of your personal data for our above-mentioned purposes is carried out on the basis of our legitimate business and communication interest in offering an information and communication channel pursuant to Art. 6(1)(f) GDPR. If you as a user have given consent to data processing to the provider of the social network, the legal basis extends to Art. 6(1)(a), Art. 7 GDPR.

Because the actual data processing is carried out by the provider of the social network, our access options to your data are limited. Only the provider of the social network is authorized to have full access to your data. For this reason, only the provider can directly take measures to fulfill your user rights (request for information, request for deletion, objection, etc.) and implement them. Exercising the corresponding rights is therefore most effective directly with the respective provider.

We are jointly responsible with Facebook for the personal content of the fan page. Data subject rights can be asserted with Meta Platforms Ireland Ltd. as well as with us.

The primary responsibility for processing insights data lies with Facebook in accordance with the GDPR and Facebook fulfills all obligations under the GDPR with regard to processing insights data; Meta Platforms Ireland Ltd. provides the essence of the Page Insights Controller Addendum to data subjects.

We do not make decisions regarding the processing of insights data and the storage duration of cookies on user devices.

Further information can be found directly at Facebook (Addendum with Facebook):

[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

More information, including the exact scope and purposes of processing your personal data, storage duration/deletion, and guidelines on the use of cookies and similar technologies in the context of registration and use, can be found in Facebook's privacy policy/cookie policy:

[https://www.facebook.com/privacy/policy/?entry\\_point=data\\_policy\\_redirect&entry=0](https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0)  
<https://www.facebook.com/policies/cookies>

#### Instagram page

When visiting our Instagram page, Instagram records, among other things, your IP address and further information that is present in the form of cookies on your PC. This information is used to provide us as the operator of the Instagram pages with statistical information about the use of the Instagram page. Instagram provides more information via the following link:

<https://facebook.com/help/pages/insights>.

Using the transmitted statistical information, it is not possible for us to draw conclusions about individual users. We use these only to respond to the interests of our users and to continuously improve our online presence and ensure its quality.

We collect your data via our fan page solely in order to enable communication and interaction with us. This collection generally includes your name, message content, comment content, and the profile information you provide “publicly”.

Processing of your personal data for our above-mentioned purposes is carried out on the basis of our legitimate business and communication interest in offering an information and communication channel pursuant to Art. 6(1)(f) GDPR. If you as a user have given consent to data processing to the provider of the social network, the legal basis extends to Art. 6(1)(a), Art. 7 GDPR.

Because the actual data processing is carried out by the provider of the social network, our access options to your data are limited. Only the provider of the social network is authorized to have full access to your data. For this reason, only the provider can directly take measures to fulfill your user rights (request for information, request for deletion, objection, etc.) and implement them. Exercising the corresponding rights is therefore most effective directly with the respective provider.

We are jointly responsible with Instagram for the personal content of the fan page. Data subject rights can be asserted with Facebook Ireland as well as with us.

The primary responsibility for processing insights data lies with Instagram in accordance with the GDPR and Instagram fulfills all obligations under the GDPR with regard to processing insights data; Facebook Ireland provides the essence of the Page Insights Controller Addendum to data subjects.

We do not make decisions regarding the processing of insights data and all other information arising from Art. 13 GDPR, including legal basis, identity of the controller, and storage duration of cookies on user devices.

Further information can be found directly at Instagram (Addendum with Facebook):  
[https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

#### LinkedIn page

LinkedIn is a social network of LinkedIn Inc., headquartered in Sunnyvale, California, USA, which enables the creation of private and professional profiles of natural persons and company profiles. Users can maintain their existing contacts within the social network and make new ones.

Companies and other organizations can create profiles where photos and other corporate information are uploaded in order to present themselves as an employer and recruit employees. Other LinkedIn users have access to this information and can write their own articles and share this content with others. The focus of the network is professional exchange on specialist topics with people who have the same professional interests.

When using or visiting the network, LinkedIn automatically collects data from users or visitors during use/visit, for example username, job title, and IP address. This is done with the help of various tracking technologies. LinkedIn provides users, among other things, with information, offers, and recommendations on the basis of the data collected in this way.

We collect your data via our company profile solely in order to enable communication and interaction with us. This collection generally includes your name, message content, comment content, and the profile information you provide “publicly”.

Processing of your personal data for our above-mentioned purposes is carried out on the basis of our legitimate business and communication interest in offering an information and communication channel pursuant to Art. 6(1)(f) GDPR. If you as a user have given consent to data processing to the provider of the social network, the legal basis extends to Art. 6(1)(a), Art. 7 GDPR.

Because the actual data processing is carried out by the provider of the social network, our access options to your data are limited. Only the provider of the social network is authorized to have full

access to your data. For this reason, only the provider can directly take measures to fulfill your user rights (request for information, request for deletion, objection, etc.) and implement them. Exercising the corresponding rights is therefore most effective directly with the respective provider.

We are jointly responsible with LinkedIn for the personal content of our company profile. Data subject rights can be asserted with LinkedIn Inc. as well as with us.

We do not make decisions regarding the data collected on LinkedIn's site by means of tracking technologies.

More information about LinkedIn can be found at: <https://about.linkedin.com>.

More information about data protection at LinkedIn can be found at:

<https://www.linkedin.com/legal/privacy-policy>.

More information on storage duration/deletion as well as guidelines on the use of cookies and similar technologies in the context of registration and use at LinkedIn can be found at:

[https://de.linkedin.com/legal/cookie-policy?trk=homepage-basic\\_footer-cookie-policy](https://de.linkedin.com/legal/cookie-policy?trk=homepage-basic_footer-cookie-policy).

**XING page**

XING is a social network of XING SE, headquartered in Hamburg, Germany, which enables the creation of private and professional profiles. Users can maintain their existing contacts and make new ones. Companies can create profiles where photos and other company information are uploaded. Other XING users have access to this information and can write their own articles and share this content with others.

The focus is on professional exchange on specialist topics with people who have the same professional interests. In addition, XING is often used by companies and other organizations to recruit employees and present themselves as an attractive employer.

More information about XING can be found at: <https://corporate.xing.com/de/unternehmen/>

More information about data protection at XING can be found at:

<https://privacy.xing.com/de/datenschutzerklaerung>.

We do not collect or process personal data via our XING company page.

**Use of analysis, advertising and tracking tools and other services on our website**

In order to make our website as pleasant and convenient as possible for you as a user, we use selected services of external providers. Below you can inform yourself about the privacy policies regarding the use and application of the services and functions used, in order to potentially exercise your rights with these providers as well.

**Google Maps**

We use the Google Maps map service to create directions. Google Maps is a service of Google Ireland Limited that displays a map on our website.

When you access these contents of our website, you establish a connection to servers of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, whereby your IP address and, if applicable, browser data such as your user agent are transmitted. These data are processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Google Maps.

**Purpose and legal basis**

Google Maps is used on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG.

We intend to transfer personal data to third countries outside the European Economic Area, in particular the USA. The transfer of data to the USA takes place pursuant to Art. 45(1) GDPR on the basis of the European Commission's adequacy decision. The participating US companies and/or their US sub-processors are certified under the EU-U.S. Data Privacy Framework (EU-U.S. DPF).

In cases where no adequacy decision of the European Commission exists (including US companies that are not certified under the EU-U.S. DPF), we have agreed other appropriate safeguards within the meaning of Art. 44 et seq. GDPR with the recipients of the data. These are—unless otherwise stated—EU standard contractual clauses of the European Commission pursuant to Implementing Decision (EU) 2021/914 of 4 June 2021. A copy of these standard contractual clauses can be viewed at <https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE>.

In addition, prior to such a third-country transfer, we obtain your consent pursuant to Art. 49(1) sentence 1(a) GDPR, which you grant via the consent in the consent manager (or other forms, registrations, etc.). We point out that in the case of third-country transfers, there may be risks unknown in detail (e.g. data processing by security authorities in the third country, the exact scope

and consequences of which we do not know, over which we have no influence and of which you may not become aware).

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by Google Ireland Limited. Further information can be found in Google Maps' privacy policy: <https://policies.google.com/privacy>.

#### Bidr

We have integrated Bidr on our website. Bidr is a service from Bidr that displays targeted advertising to users. Bidr uses cookies and other browser technologies to evaluate user behavior and recognize users. Bidr collects information about visitor behavior on various websites. This information is used to optimize advertising relevance. Bidr also delivers targeted advertising based on behavioral profiles and geographic location. Your IP address and further identification features such as your user agent are transmitted to the provider. In this case, your data are passed on to the operator of Bidr, Bidr, .

Web tracking technologies are used to create pseudonymized user profiles. These profiles cannot be merged with you as a natural person, but serve, for example, segmentation when displaying advertisements.

#### Purpose and legal basis

Bidr is used on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG.

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by Bidr. Further information can be found in Bidr's privacy policy: <http://www.beeswax.io/privacy.html>.

#### Dialogshift

We use Dialogshift to properly provide the contents of our website. Dialogshift is a service of DialogShift GmbH, which functions as a content delivery network (CDN) on our website.

A CDN helps to deliver content of our online offering—especially files such as graphics or scripts—faster via regionally or internationally distributed servers. When you access this content, you establish a connection to servers of DialogShift GmbH, Rheinsberger Straße 76/77 10115 Berlin, Germany, whereby your IP address and, if applicable, browser data such as your user agent are transmitted. These data are processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Dialogshift.

#### Purpose and legal basis

Use of the content delivery network is based on our legitimate interests, i.e. interest in secure and efficient provision and optimization of our online offering pursuant to Art. 6(1)(f) GDPR.

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by DialogShift GmbH. Further information can be found in Dialogshift's privacy policy:

<https://www.dialogshift.com/datenschutz>.

#### Google Ads

We have integrated Google Ads on our website. Google Ads is a service of Google Ireland Limited to display targeted advertising to users. Google Ads uses cookies and other browser technologies to evaluate user behavior and recognize users.

Google Ads collects information about visitor behavior on various websites. This information is used to optimize the relevance of advertising. Google Ads also delivers targeted advertising based on behavioral profiles and geographic location. Your IP address and further identification features such as your user agent are transmitted to the provider.

If you are registered with a Google Ireland Limited service, Google Ads can assign the visit to your account. Even if you are not registered with Google Ireland Limited or are not logged in, it is possible that the provider can determine and store your IP address and other identification features.

In this case, your data are passed on to the operator of Google Ads, Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

#### Purpose and legal basis

Google Ads is used on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG.

We intend to transfer personal data to third countries outside the European Economic Area, in particular the USA. The transfer of data to the USA takes place pursuant to Art. 45(1) GDPR on the basis of the European Commission's adequacy decision. The participating US companies and/or their US sub-processors are certified under the EU-U.S. Data Privacy Framework (EU-U.S. DPF).

In cases where no adequacy decision of the European Commission exists (including US companies that are not certified under the EU-U.S. DPF), we have agreed other appropriate safeguards within the meaning of Art. 44 et seq. GDPR with the recipients of the data. These are—unless otherwise stated—EU standard contractual clauses of the European Commission pursuant to Implementing Decision (EU) 2021/914 of 4 June 2021. A copy of these standard contractual clauses can be viewed at <https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE>.

In addition, prior to such a third-country transfer, we obtain your consent pursuant to Art. 49(1) sentence 1(a) GDPR, which you grant via the consent in the consent manager (or other forms, registrations, etc.). We point out that in the case of third-country transfers, there may be risks unknown in detail (e.g. data processing by security authorities in the third country, the exact scope and consequences of which we do not know, over which we have no influence and of which you may not become aware).

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by Google Ireland Limited. Further information can be found in Google Ads' privacy policy: <https://policies.google.com/privacy>.

#### Google Analytics

Our website uses Google Analytics 4, a web analytics service of Google LLC. The responsible entity for users in the EU/EEA and Switzerland is Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland ("Google").

Google Analytics uses cookies that enable an analysis of your use of our websites. The information collected via the cookies about your use of this website is generally transmitted to a Google server in the USA and stored there.

We use the User-ID function. With the help of the User ID, we can assign a unique, permanent ID to one or more sessions (and activities within those sessions) and analyze user behavior across devices.

We also use Google Signals. This records additional information in Google Analytics about users who have enabled personalized ads (interest and demographic data), and ads can be delivered to these users in cross-device remarketing campaigns.

In Google Analytics 4, IP anonymization is enabled by default. Due to IP anonymization, your IP address is shortened by Google within Member States of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transmitted to a Google server in the USA and shortened there. According to Google, the IP address transmitted by your browser as part of Google Analytics is not merged with other Google data.

During your website visit, your user behavior is recorded in the form of "events". Events can include:

- Page views
- First visit to the website
- Start of the session
- Your "click path", interaction with the website
- Scrolls (whenever a user scrolls to the end of the page (90%))
- Clicks on external links
- Internal search queries
- Interaction with videos
- File downloads
- Ads viewed/clicked
- Language setting

In addition, the following is recorded:

- Your approximate location (region)
- Your IP address (in shortened form)
- Technical information about your browser and the end devices you use (e.g. language setting, screen resolution)

- Your internet provider
- The referrer URL (which website/which advertising medium you came to this website from)

#### Purposes of processing

On our behalf, Google will process the transmitted information to evaluate the use of the website by visitors and to compile reports on website activity. The reports provided by Google Analytics serve us to analyze website performance.

#### Recipients

Recipients of the data are/can be:

- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (as processor pursuant to Art. 28 GDPR)
- Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
- Alphabet Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

It cannot be ruled out that US authorities may access the data stored by Google.

#### Third-country transfer

Insofar as data are processed outside the EU/EEA and there is no level of data protection corresponding to the European standard, we have concluded EU standard contractual clauses with the service provider to establish an appropriate level of data protection. Google Ireland's parent company, Google LLC, is headquartered in California, USA. Transfer of data to the USA and access by US authorities to the data stored by Google cannot be ruled out. From a data protection perspective, the USA is currently considered a third country. You do not have the same rights there as within the EU/EEA. You may not have any legal remedies against access by authorities.

#### Storage duration

The data sent by us and linked to cookies are automatically deleted after 14 months. The deletion of data whose retention period has been reached takes place automatically once a month.

#### Legal basis and withdrawal

We process your data with the help of Google Analytics 4 on the basis of your consent pursuant to Art. 6(1)(a) GDPR in conjunction with § 25 TDDG. You grant your consent by setting cookie usage (cookie banner/consent manager), with which you can also declare your withdrawal with effect for the future pursuant to Art. 7(3) GDPR at any time.

You can also prevent the storage of cookies from the outset by configuring your browser software accordingly. If you configure your browser so that all cookies are rejected, however, this may lead to restrictions of functionalities on this and other websites. You can also prevent the collection by Google of the data generated by the cookie and related to your use of the website (including your IP address) as well as the processing of these data by Google by (I) not granting your consent to the setting of the cookie, or (II) downloading and installing the browser add-on to deactivate Google Analytics here: <https://tools.google.com/dlpage/gaoptout?hl=de>.

Further information can be found in the terms of use

<https://marketingplatform.google.com/about/Analytics/terms/de/> and in the privacy policy <https://policies.google.com/?hl=de> for Google.

#### Google CDN

We use Google CDN to properly provide the contents of our website. Google CDN is a service of Google Ireland Limited that functions as a content delivery network (CDN) on our website.

A CDN helps to deliver content of our online offering—especially files such as graphics or scripts—faster via regionally or internationally distributed servers. When you access this content, you establish a connection to servers of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, whereby your IP address and, if applicable, browser data such as your user agent are transmitted. These data are processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Google CDN.

#### Purpose and legal basis

Use of the content delivery network is based on our legitimate interests, i.e. interest in secure and efficient provision and optimization of our online offering pursuant to Art. 6(1)(f) GDPR.

We intend to transfer personal data to third countries outside the European Economic Area, in particular the USA. The transfer of data to the USA takes place pursuant to Art. 45(1) GDPR on the basis of the European Commission's adequacy decision. The participating US companies and/or their US sub-processors are certified under the EU-U.S. Data Privacy Framework (EU-U.S. DPF).

In cases where no adequacy decision of the European Commission exists (including US companies that are not certified under the EU-U.S. DPF), we have agreed other appropriate safeguards within the meaning of Art. 44 et seq. GDPR with the recipients of the data. These are—unless otherwise stated—EU standard contractual clauses of the European Commission pursuant to Implementing Decision (EU) 2021/914 of 4 June 2021. A copy of these standard contractual clauses can be viewed at <https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE>.

In addition, prior to such a third-country transfer, we obtain your consent pursuant to Art. 49(1) sentence 1(a) GDPR, which you grant via the consent in the consent manager (or other forms, registrations, etc.). We point out that in the case of third-country transfers, there may be risks unknown in detail (e.g. data processing by security authorities in the third country, the exact scope and consequences of which we do not know, over which we have no influence and of which you may not become aware).

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by Google Ireland Limited. Further information can be found in Google CDN's privacy policy: <https://policies.google.com/privacy>.

#### Google Fonts

We use Google Fonts from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, as a service to provide fonts for our online offering. To obtain these fonts, you establish a connection to our own servers in Germany, whereby your IP address is transmitted.

Use of Google Fonts is based on our legitimate interests, i.e. interest in uniform provision and optimization of our online offering. No data are transmitted to Google.

#### Google Tag Manager

We use Google Tag Manager of 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 enables us to flexibly integrate additional services in order to evaluate user access to our website.

#### Purpose and legal basis

Google Tag Manager is used on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDG.

We intend to transfer personal data to third countries outside the European Economic Area, in particular the USA. The transfer of data to the USA takes place pursuant to Art. 45(1) GDPR on the basis of the European Commission's adequacy decision. The participating US companies and/or their US sub-processors are certified under the EU-U.S. Data Privacy Framework (EU-U.S. DPF).

In cases where no adequacy decision of the European Commission exists (including US companies that are not certified under the EU-U.S. DPF), we have agreed other appropriate safeguards within the meaning of Art. 44 et seq. GDPR with the recipients of the data. These are—unless otherwise stated—EU standard contractual clauses of the European Commission pursuant to Implementing Decision (EU) 2021/914 of 4 June 2021. A copy of these standard contractual clauses can be viewed at <https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE>.

In addition, prior to such a third-country transfer, we obtain your consent pursuant to Art. 49(1) sentence 1(a) GDPR, which you grant via the consent in the consent manager (or other forms, registrations, etc.). We point out that in the case of third-country transfers, there may be risks unknown in detail (e.g. data processing by security authorities in the third country, the exact scope and consequences of which we do not know, over which we have no influence and of which you may not become aware).

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by Google Ireland Limited. Further information can be found in Google Tag Manager's privacy policy: <https://marketingplatform.google.com/about/analytics/tag-manager/use-policy/>.

#### Google reCAPTCHA

We have integrated components of Google reCAPTCHA on our website. Google reCAPTCHA is a service of Google Ireland Limited and enables us to distinguish whether a contact request originates from a natural person or is made automatically by a program. When you access this content, you establish a connection to servers of Google Ireland Limited, Gordon House, Barrow

Street, Dublin 4, Ireland, whereby your IP address and, if applicable, browser data such as your user agent are transmitted. In addition, Google reCAPTCHA records the user's dwell time and mouse movements in order to distinguish automated requests from human ones. These data are processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Google reCAPTCHA.

#### Purpose and legal basis

Google reCAPTCHA is used on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG.

We intend to transfer personal data to third countries outside the European Economic Area, in particular the USA. The transfer of data to the USA takes place pursuant to Art. 45(1) GDPR on the basis of the European Commission's adequacy decision. The participating US companies and/or their US sub-processors are certified under the EU-U.S. Data Privacy Framework (EU-U.S. DPF).

In cases where no adequacy decision of the European Commission exists (including US companies that are not certified under the EU-U.S. DPF), we have agreed other appropriate safeguards within the meaning of Art. 44 et seq. GDPR with the recipients of the data. These are—unless otherwise stated—EU standard contractual clauses of the European Commission pursuant to Implementing Decision (EU) 2021/914 of 4 June 2021. A copy of these standard contractual clauses can be viewed at <https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE>.

In addition, prior to such a third-country transfer, we obtain your consent pursuant to Art. 49(1) sentence 1(a) GDPR, which you grant via the consent in the consent manager (or other forms, registrations, etc.). We point out that in the case of third-country transfers, there may be risks unknown in detail (e.g. data processing by security authorities in the third country, the exact scope and consequences of which we do not know, over which we have no influence and of which you may not become aware).

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by Google Ireland Limited. Further information can be found in Google reCAPTCHA's privacy policy: <https://policies.google.com/privacy?hl=en-US>.

#### LinkedIn Ads

We have integrated LinkedIn Ads on our website. LinkedIn Ads is a service of LinkedIn Corporation that displays targeted advertising to users. LinkedIn Ads uses cookies and other browser technologies to evaluate user behavior and recognize users. LinkedIn Ads collects information about visitor behavior on various websites. This information is used to optimize advertising relevance. LinkedIn Ads also delivers targeted advertising based on behavioral profiles and geographic location. Your IP address and further identification features such as your user agent are transmitted to the provider. In this case, your data are passed on to the operator of LinkedIn Ads, LinkedIn Corporation, Sunnyvale, California, US.

Web tracking technologies are used to create pseudonymized user profiles. These profiles cannot be merged with you as a natural person, but serve, for example, segmentation when displaying advertisements.

#### Purpose and legal basis

LinkedIn Ads is used on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDDG.

We intend to transfer personal data to third countries outside the European Economic Area, in particular the USA. The transfer of data to the USA takes place pursuant to Art. 45(1) GDPR on the basis of the European Commission's adequacy decision. The participating US companies and/or their US sub-processors are certified under the EU-U.S. Data Privacy Framework (EU-U.S. DPF).

In cases where no adequacy decision of the European Commission exists (including US companies that are not certified under the EU-U.S. DPF), we have agreed other appropriate safeguards within the meaning of Art. 44 et seq. GDPR with the recipients of the data. These are—unless otherwise stated—EU standard contractual clauses of the European Commission pursuant to Implementing Decision (EU) 2021/914 of 4 June 2021. A copy of these standard contractual clauses can be viewed at <https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE>.

In addition, prior to such a third-country transfer, we obtain your consent pursuant to Art. 49(1) sentence 1(a) GDPR, which you grant via the consent in the consent manager (or other forms, registrations, etc.). We point out that in the case of third-country transfers, there may be risks unknown in detail (e.g. data processing by security authorities in the third country, the exact scope

and consequences of which we do not know, over which we have no influence and of which you may not become aware).

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by LinkedIn Corporation. Further information can be found in LinkedIn Ads' privacy policy: [https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic\\_footer-privacy-policy](https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy).

#### LinkedIn Insight Tag

We use the LinkedIn Insight Tag from LinkedIn Corporation, Sunnyvale, California, US, to create audiences, segment visitor groups of our online offering, measure conversion rates, and subsequently optimize them. This occurs in particular when you interact with advertisements that we have placed with LinkedIn Corporation. LinkedIn Corporation offers retargeting for website visitors to display targeted advertising outside our website.

The LinkedIn Insight Tag collects data about visits to our website, including URL, referrer URL, IP address, device and browser properties (user agent), and timestamps. These data are used to display anonymized reports about the website audience and ad performance.

#### Purpose and legal basis

The LinkedIn Insight Tag is used on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDG.

We intend to transfer personal data to third countries outside the European Economic Area, in particular the USA. The transfer of data to the USA takes place pursuant to Art. 45(1) GDPR on the basis of the European Commission's adequacy decision. The participating US companies and/or their US sub-processors are certified under the EU-U.S. Data Privacy Framework (EU-U.S. DPF).

In cases where no adequacy decision of the European Commission exists (including US companies that are not certified under the EU-U.S. DPF), we have agreed other appropriate safeguards within the meaning of Art. 44 et seq. GDPR with the recipients of the data. These are—unless otherwise stated—EU standard contractual clauses of the European Commission pursuant to Implementing Decision (EU) 2021/914 of 4 June 2021. A copy of these standard contractual clauses can be viewed at <https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE>.

In addition, prior to such a third-country transfer, we obtain your consent pursuant to Art. 49(1) sentence 1(a) GDPR, which you grant via the consent in the consent manager (or other forms, registrations, etc.). We point out that in the case of third-country transfers, there may be risks unknown in detail (e.g. data processing by security authorities in the third country, the exact scope and consequences of which we do not know, over which we have no influence and of which you may not become aware).

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by LinkedIn Corporation. Further information can be found in the privacy policy for the LinkedIn Insight Tag: <https://www.linkedin.com/legal/privacy-policy>.

#### THE HOTELS NETWORK

We have integrated THE HOTELS NETWORK on our website. THE HOTELS NETWORK is a service of THE HOTELS NETWORK, S.L., Av. Diagonal, 439, 3º-1<sup>a</sup>, 08036 Barcelona, Spain. We use THE HOTELS NETWORK to accept reservations and measure their success.

THE HOTELS NETWORK uses cookies and other browser technologies to analyze user behavior, recognize users, and increase direct bookings. This information is used, among other things, to compile reports about website activity.

THE HOTELS NETWORK also enables us to complete direct bookings via our website.

Your IP address and further identification features such as your user agent are transmitted to the provider.

#### Purpose and legal basis

THE HOTELS NETWORK is used on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDG.

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by THE HOTELS NETWORK, S.L. Further information can be found in THE HOTELS NETWORK's privacy policy: <https://www.thehotelsnetwork.com/de/privacy-policy>.

#### Triptease

On this website, we use Triptease, a service of Triptease Ltd, . We may share and use a limited portion of your information (such as room search, email address and name, if you provide these) with Triptease to collect data for analytics purposes when you visit our website to book a stay with us. Triptease analyzes your use of our website and tracks this using cookies and similar technologies so that we can improve our service for you.

#### Purpose and legal basis

We use Triptease to analyze user behavior. The legal basis for using Triptease is your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDG.

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by Triptease Ltd. Further information can be found in Triptease's privacy policy: <https://triptease.com/en/privacy-policy/>.

#### Vimeo Video

We have integrated Vimeo Video on our website. Vimeo Video is a component of Vimeo, LLC's video platform, where users can upload content, share it via the internet, and obtain detailed statistics.

Vimeo Video enables us to embed platform content on our website.

Vimeo Video uses cookies and other browser technologies to analyze user behavior, recognize users, and create user profiles. This information is used, among other things, to analyze activity regarding the accessed content and to create reports.

When you access this content, you establish a connection to servers of Vimeo, LLC, 555 W 18th St, New York, New York 10011, whereby your IP address and, if applicable, browser data such as your user agent are transmitted.

#### Purpose and legal basis

Vimeo Video is used on the basis of your consent pursuant to Art. 6(1)(a) GDPR and § 25(1) TDDG.

We intend to transfer personal data to third countries outside the European Economic Area, in particular the USA. The transfer of data to the USA takes place pursuant to Art. 45(1) GDPR on the basis of the European Commission's adequacy decision. The participating US companies and/or their US sub-processors are certified under the EU-U.S. Data Privacy Framework (EU-U.S. DPF).

In cases where no adequacy decision of the European Commission exists (including US companies that are not certified under the EU-U.S. DPF), we have agreed other appropriate safeguards within the meaning of Art. 44 et seq. GDPR with the recipients of the data. These are—unless otherwise stated—EU standard contractual clauses of the European Commission pursuant to Implementing Decision (EU) 2021/914 of 4 June 2021. A copy of these standard contractual clauses can be viewed at <https://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32021D0914&from=DE>.

In addition, prior to such a third-country transfer, we obtain your consent pursuant to Art. 49(1) sentence 1(a) GDPR, which you grant via the consent in the consent manager (or other forms, registrations, etc.). We point out that in the case of third-country transfers, there may be risks unknown in detail (e.g. data processing by security authorities in the third country, the exact scope and consequences of which we do not know, over which we have no influence and of which you may not become aware).

#### Storage duration

The specific storage duration of the processed data is not influenced by us, but is determined by Vimeo, LLC. Further information can be found in Vimeo's privacy policy: <https://vimeo.com/privacy>.

#### Changes to these privacy notices

We revise these privacy notices if changes are made to this website or for other reasons that make this necessary. The current version can always be found on this website.

Last updated on 04.12.2025