

Version: 5.21

## 1. Preface

Data protection is extremely important to Spacebase and we do everything in order to protect your data. However, we must use data in order to be able to offer our service to customers and spaces.

If you have any questions in this regard, simply contact us.

This Data Protection Policy shall inform you of the type, manner and purpose of the processing of personal data (hereafter, "Data") within our online offering and its related webpages, functions and content as well as external websites such as, for example, our social media profiles (hereafter collectively referred to as "Online Offer"). With regards to the terms used, e.g. "Processing" or "Responsible Party", we make reference to the definitions in Art. 4 of the General Data Protection Regulation (GDPR).

## 2. Responsible Party

Spacebase GmbH

Luckenwalder Str. 6B

10963 Berlin, Germany

info@spacebase.com

Managing Director: Julian Jost

Link to the Imprint Section: [www.spacebase.com/de/policies/terms/](http://www.spacebase.com/de/policies/terms/)

Contact for the Data Protection Officer: [Datenschutz@spacebase.com](mailto:Datenschutz@spacebase.com)

Last Updated: August 1<sup>st</sup> 2020

Deskbookers B.V., MICE Service GmbH are fully owned subsidiary of Spacebase GmbH. Deskbookers B.V. (and MICE Service GmbH) use technology and processes of Spacebase GmbH for the fulfillment of purposes as defined in this Privacy Policy. For the purposes below Spacebase GmbH may receive personal data about you from Deskbookers B.V., MICE Service GmbH, or another fully owned subsidiary, or share your personal data with them for the following purposes:

1. To provide services (for example to make, administer and manage bookings or handle payments);
2. To provide customer support services and handle exceptions;
3. To detect, prevent and investigate fraudulent or other illegal activities and data breaches;
4. For analytical and product improvement purposes;
5. To provide personalised offers or send you marketing with your consent or as otherwise permitted by applicable law;
6. To ensure compliance with applicable laws.

Unless indicated otherwise, for purposes 1 to 5, Spacebase or its respective subsidiary rely on its legitimate interest to share and receive personal data. For purpose 6, Spacebase or its respective rely where applicable on compliance with legal obligations (such as lawful law enforcement requests).

### 3. Types of Processed Data:

- Basic data (e.g. names, addresses)
- Contact data (e.g. e-mail address, telephone numbers)
- Content data (e.g. content entries, photos, videos)
- Usage data (e.g. websites visited, interest in content, access times)
- Meta/communication data (e.g. device information, IP addresses)

### 4. Purpose of the processing

- Providing the Online Offer, its functions and content – particularly the booking of rooms (“Spaces”)
- Responding to contact inquiries and communication with users (“customer service”)
- Security measures
- Audience reach measurement/marketing

### 5. Prevailing Legal Bases

In accordance with Art. 13 GDPR, we shall notify you of the legal bases for our Data Processing. Insofar as the legal basis is not specified in the Privacy policy, the following shall be valid:

- The legal basis for the processing based on consent shall be Art. 6 Para. 1 lit. a and Art. 7 GDPR
- The legal basis for the processing for the performance of a contract or in order to take steps prior to a contract be Art. 6 Para. 1 lit. b GDPR
- The legal basis for the processing in order to fulfil our legal obligations shall be Art. 6 Para. 1 lit. c GDPR
- The legal basis for the processing in order maintain or legitimate interests shall be Art. 6 Para. 1 lit. f GDPR.
- In the event that vital interests of the affected person or another natural person make the processing of personal Data required, Art. 6 Para. 1 lit. d GDPR shall serve as the legal basis.

### 6. Changes

We request that you review the content of our Data Protection Policy upon a regular basis. We shall make changes to the Data Protection Policy as soon as the changes to the Data Processing which we do make this required. We shall notify you as soon as a cooperative action upon your part (e.g. consent) or any other individual notification becomes required as the result of the changes.

## 7. Cooperation with Contracted Data Processors and Third Parties

Insofar as, within the parameters of our Processing, we disclose Data to other persons and companies (contracted data processors or third parties), transmit Data to them or otherwise grant them access to the Data, this shall be done only upon the basis of a legal permission to do so (e.g. if a transmission of the Data to third parties, e.g. to payment processing service providers or the providers of booked Spaces, is required in accordance with Art. 6 Para. 1 lit. b GDPR in order to fulfil the contractual agreement), you have approved this, a legal obligation prescribes this or upon the basis of our rightful interests (e.g. for the commissioning of subcontractors, web hosters, etc.).

Insofar as we commission third parties with the Processing of Data upon the basis of a so-called “Contracted Data Processing Agreement”, this shall occur upon the basis of Art. 28 GDPR.

## 8. Transmissions to Non-EU Countries

Insofar as we process data in a non-EU country (i.e. outside of the European Union (EU) or the European Economic Area (EEA)) or this occurs within the parameters of the commissioning of third-party services or disclosure and/or transmission of data to third parties otherwise occurs, this shall be undertaken only if this occurs for the fulfilment of our (pre-)contractual obligations, upon the basis of your consent, owing to a legal obligation or upon the basis of our rightful interests. Subject to the legal or contractual permissions, we shall process, or have the Data processed, in a non-EU country only in the event that the special requirements prescribed in Art. 44 ff. GDPR have been fulfilled. That is to say, the processing shall be undertaken, for example, upon the basis of special guarantees such as the officially-recognised establishment of a data protection level corresponding to one of the data protection levels that is valid for the EU (e.g. for the USA by the “Privacy Shield”) or the fulfilment of officially-recognised special contractual obligations (so-called “Standard Contractual Clauses”) or, for example, if the transmission is required to fulfil contractual obligations (e.g. when the booked room is situated in a non-EU country).

## 9. Rights of the Affected Persons

You shall have the right to demand a confirmation of whether the affected Data are being processed and information regarding these Data as well as additional information and a copy of the Data in accordance with Art. 15 GDPR.

You shall, in accordance with Art. 16 GDPR, have the right to demand the completion of your Personal Data or the correction of your incorrect Personal Data.

You shall, in accordance with Art. 17 GDPR, have the right to demand that the affected Data be promptly deleted and/or alternatively a restriction of the Processing of the Data in accordance with Art. 18 GDPR.

You shall have the right to demand that your personal data, which you have provided to us, be preserved in accordance with Art. 20 GDPR and demand their transmission to other Responsible Parties.

Furthermore, in accordance with Art. 77 GDPR, you shall have the right to submit a complaint to the competent government supervisory agency.

#### 10. Right of Revocation

You shall have the right to revoke any consents that have been issued in accordance with Art. 7 Para. 3 GDPR with effectiveness for the future.

#### 11. Right of Objection

You may at any time lodge an objection to the future processing of your Personal Data in accordance with Art. 21 GDPR. The objection may be lodged particularly against the Processing for purposes of direct advertising.

#### 12. Cookies and Right of Objection to Direct Advertising

“Cookies” refer to small files which are stored on the users’ computers. Within the cookies, various data can be stored. A cookie serves primarily to store data about a user (and/or the device upon which the cookie is stored) during or after his/her visit to an Online Offer. Temporary cookies, and/or “session cookies” or “transient cookies” refer to cookies which are deleted after a user leaves an Online Offer and closes his/her browser. In such a cookie, for example, the content of a shopping basket can be stored in an online shop or a log-in status. Cookies are referred to as “permanent” or “persistent” which remain stored even after the browser is closed. Thus, for example, the log-in status can be stored if the user comes back on the site several days later. The interests of the users can likewise be stored in such a cookie which is used for the purposes of audience reach measurements or marketing. “Third-party cookie” refers to cookies which are offered by other providers than the Responsible Party who operates the Online Offer (otherwise, if it is only his cookies, one speaks of “first-party cookies”).

We may utilise temporary and permanent cookies and shall discuss them in detail in our Privacy policy.

If the users would not like for cookies to be stored on their computer, they are asked to deactivate the corresponding option in their browser’s system settings. The stored cookies can be deleted via the browser’s system settings. However, the blocking of cookies can result in functional restrictions of this Online Offer.

A general objection to the usage of cookies for the purposes of online marketing may be declared with regards to numerous services – particularly regarding tracking – via the U.S.-based website <http://www.aboutads.info/choices/> or the EU-based website <http://www.youronlinechoices.com/>. Furthermore, blocking of cookies can be attained via their deactivation via the browser’s settings. Please keep in mind that, where applicable, not all functions of this Online Offer will be able to be used.

#### 13. Deletion of Data

The Data which we process shall be deleted or restricted in their Processing in accordance with Art. 17 and 18 GDPR. Insofar as nothing has been expressly stated in this Privacy policy, the data that we have

stored shall be deleted as soon as they are no longer required for their designated purpose and no statutory retention obligations oppose the deletion. Insofar as the data are not deleted because they are required for other and legally-permissible purposes, their Processing shall be restricted. That is to say, the data shall be blocked and not processed for other purposes. This shall be valid, for example, for Data which must be retained for commercial and tax law reasons.

In accordance with the statutory directives in Germany, the retention shall be undertaken particularly for 10 years in accordance with §§ 147 Para. 1 AO [**German Tax Code**], 257 Para. 1 Nos. 1 and 4, Para. 4 HGB [**German Commercial Code**] (ledgers, records, status reports, booking documentation, trading books, documents relevant for taxation purposes, etc.) and 6 years in accordance with § 257 Para. 1 Nos. 2 and 3, Para. 4 HGB (business letters).

#### 14. Business-Related Processing

In addition, we shall process the following

- Contractual data (e.g. contractual object, contractual term, customer category)
- Payment data (e.g. bank details, payment history)

from our customers, prospective customers and business partners for the purpose of the rendering of the contractual services, service and customer care, marketing, advertising and market research.

This shall include particularly also the Data which are inputted during the registration as a provider.

All Data inputted by the provider in the profiles can be viewed by Spacebase employees and can be used for the implementation of bookings and the improvement of the service quality (particularly for telephone calls and e-mails – e.g. if a customer has detailed questions). Most of these data can be viewed online and also passed on to customers.

If the provider decides to integrate a calendar into our system, the released data shall be stored in the Spacebase system and both the customers as well as also the employees can view these data (vacant/occupied). If the provider sends details in the calendar (which is not required), these details could theoretically be viewed by employees by exerting efforts to do so.

The description fields in space and venue profiles are solely intended for description of the venue and spaces. They are NOT suitable for inputting personal data (data in these fields is made publicly available and will be translated by 3<sup>rd</sup> party services). It is forbidden to input any personal data in these fields.

#### 15. Hosting

The hosting services which we utilise serve the purpose of rendering the following services: Infrastructure and platform services, computing capacity, memory and database services, security services as well as technical maintenance services which we use for the purpose of the operation of this Online Offer.

In this regard, we and/or our hosting provider shall process basic data, contact data, content data, contractual data, usage data, meta- and communications data from the customers, prospective

customers and visitors to this Online Offer upon the basis of our rightful interests in an efficient and secure providing of this Online Offer in accordance with Art. 6 Para. 1 lit. f GDPR in conjunction with Art. 28 GDPR (conclusion of a Contracted Data Processing Agreement).

#### 16. Collection of Access Data and Log Files

We and/or our hosting provider shall, upon the basis of our rightful interests in accordance with Art. 6 Para. 1 lit. f. GDPR, collect Data regarding each access of the server upon which this service is located (so-called server log files). The access data shall include the name of the website visited, file, date and time of day of the retrieval, transferred data quantity, notification regarding the successful retrieval, browser model in addition to version, the operating system of the user, referrer URL (the webpage previously visited), IP address and the inquiring provider.

For security reasons (e.g. for the clarification of claims of misuse or fraudulent actions), log file information shall be stored for the duration of a maximum of 7 days and then deleted. Data, whose continued retention is required for documentation purposes, shall be excepted from the deletion until the respective case has been definitively clarified.

#### 17. Order Processing and the Customer Account

We shall process the Data from our customers within the parameters of the inquiry, reservation and booking of Spaces; for ordering processes in our online shop; in order to enable the selection and the ordering of selected products and services as well as their payment and delivery and/or rendering.

The processed data shall include personal data, communication data, contractual data, payment data and the persons affected by the Processing shall include our customers, prospective customers and other business partners. The Processing shall be undertaken for the purpose of the rendering of contractual services during the operation of an online booking platform, online shops, billing, delivery and customer services. In this regard, we shall use session cookies for the storage of the shopping basket contents and permanent cookies for the storage of the log-in status.

The Processing shall be undertaken upon the basis of Art. 6 Para. 1 lit. b (implementation of ordering processes) and c (statutorily-prescribed archiving) GDPR. In this regard, the data designated as required shall indeed be required for the substantiation and fulfilment of the contractual agreement. We shall disclose the data to third parties only for the delivery, the payment or to legal consultants and government agencies in accordance with the statutory permits and obligations.

Additionally, we are processing personal data on the basis of Art. 6 Para. 1 lit. f (legitimate interest) to contact the user for the purposes of direct marketing (e.g. to suggest similar rooms when a booking has been rejected).

User data can be stored in a Customer-Relationship-Management System ("CRM system") or a similar system.

Users can set up a user account so that they can view particularly their orders. For bookings and reservations, it is required to create a user account; if a user does not already have an account, it will be created in the booking process.

During the registration, the required obligatory data shall be disclosed to the users. The user accounts

shall not be public and cannot be indexed by search engines. If users terminate their user account, their data shall be deleted for the user account unless their retention is required for commercial law or tax law reasons in accordance with Art. 6 Para. 1 lit. c GDPR. Data in the customer account shall remain there until their deletion with a subsequent archiving in the event that a valid legal obligation exists to do so. In the event that termination is declared, the users shall be responsible for backing up their data before the contractual agreement ends.

During the registration and repeated log-ins as well as the utilisation of our online services, we shall store the IP address and the point in time of the respective user's action. The storage shall be undertaken upon the basis of our rightful interests as well as to in order to protect the users from misuse and other unauthorised usage. In principle, any dissemination of these data to third parties shall not be undertaken unless this is required in order to assert our claims or a statutory obligation exists to do so in accordance with Art. 6 Para. 1 lit. c GDPR.

The deletion shall be undertaken after the lapsing of the statutory warranty and other comparable obligations while the necessity of the retention of the Data shall be reviewed every three years; in the case of the statutory archiving obligations, the deletion shall be done upon their lapsing (end of retention obligation under commercial law (6 years) and under tax law (10 years)).

#### 18. Administration, Accounting, Office Organisation, Contact Management

We shall process data for the fulfilment of administrative tasks as well as the organisation of our operations, accounting and fulfilment of the statutory obligations, e.g. archiving. In this regard, we shall process the same data which we process for the rendering of our contractual services. The Processing bases shall be Art. 6 Para. 1 lit. c. GDPR, Art. 6 Para. 1 lit. f. GDPR. The customers, prospective customers, business partners and website visitors shall be affected by the Processing. The purpose of and our interest in the Processing shall lie in the administration, accounting, office organisation, archiving of data – thus tasks which serve the purpose of the maintenance of our business activities, fulfilment of our tasks and rendering of our services. The deletion of the data with regards to contractual services and the contractual communication shall correspond to the data specified during the Processing activities.

In this regard, we shall disclose or transmit data to the governmental tax office, consultants, e.g. tax consultants or auditors, as well as other governmental institutions collecting fees and payment service providers.

Furthermore, upon the basis of our business management interests, we shall store data regarding suppliers, event organisers and other business partners, e.g. for the purpose of contacting them later. In principle, we shall permanently store these data which are primarily company-related.

#### 19. Business Management Analyses and Market Research

In order to be able to operate our business economically as well as to recognise market tendencies, customer and user requests, we shall analyse the data available to us regarding business processes, contractual agreements, inquiries, etc. In this regard, we shall process basis data, communication data, contractual data, payment data, usage data, and meta data upon the basis of Art. 6 Para. 1 lit. f. GDPR

whereby the affected persons include customers, prospective customers, business partners, visitors and users of the Online Offer.

The analyses shall be undertaken for the purposes of business management analyses, marketing and market research. In this regard, we can take into consideration the profiles of the registered users with data, for example, regarding their purchasing transactions. The analyses enable us to increase the user-friendliness, the optimisation of our website and the operational profitability. The analyses are intended for solely our usage and shall not be externally disclosed insofar as they are not anonymous analyses with summarised figures.

Insofar as these analyses or profiles are personal, upon the users' termination, they shall be deleted or anonymised—otherwise, this shall occur two years after the conclusion of the contractual agreement. Otherwise, insofar as this is possible, the overall business management analyses and general tendencies shall be anonymously created.

## 20. Data Protection Provisions for the Application Process

We shall process the applicants' data only for the purpose and within the parameters of the application process in accordance with the statutory provisions. The Processing of the applicants' data shall be undertaken for the fulfilment of our (pre-)contractual obligations during the application process in accordance with Art. 6 Para. 1 lit. b GDPR Art. 6 Para. 1 lit. f GDPR insofar as the Data Processing become required for us, for example, for legal proceedings (in Germany, § 26 GDPR shall also be valid).

The application process shall require that applicants disclose the applicant data to us. Insofar as we offer an online form, the mandatory applicant data shall be labelled as such. Otherwise, the mandatory data to be disclosed shall be based upon the job descriptions and shall in principle include the data regarding personal, postal and contact addresses and the application-related documents such as a cover letter, curriculum vitae and the work testimonials. Moreover, applicants may voluntarily provide us with additional information.

Upon the submission of the application to us, the applicants hereby declare their consent to the Processing of their Data for the purposes of the application process based upon the scope and manner specified in this Privacy policy.

Insofar as special categories of personal data are disclosed voluntarily in accordance with Art. 9 Para. 1 GDPR during the application process, their Processing shall also be undertaken in accordance with Art. 9 Para. 2 lit. b GDPR (e.g. health data such as, for example, a severe disability or ethnic origin). Insofar as special categories of personal data are requested from the applicants during the application process in accordance with Art. 9 Para. 1 GDPR, their Processing shall also be undertaken in accordance with Art. 9 Para. 2 lit. a GDPR (e.g. health data if these data are required for the fulfilment of the respective job position's work duties).

Insofar as this option is available, applicants may send us their applications via an online form on our website. The Data shall be transmitted to us in encrypted fashion subject to the fulfilment of state-of-the-art technology standards.



Furthermore, applicants may send their applications to us via e-mail. However, in this regard, we nonetheless request that you keep in mind that e-mails cannot in principle be sent in encrypted fashion and the applicants themselves must ensure that such encryption is done. Thus, we assume no responsibility for the transmission route for the application between the sender and the receipt upon our server and thus recommend the usage preferably of an online form or submission of the application via the postal service because, instead of sending the application via the online form and e-mail, the applicants are also provided with the option of sending us the application via post.

In the event that an application is successful, the data provided by the applicant may continue to be processed by us for the purposes of the employment relationship. Otherwise, insofar as the application is not successful for a job announcement, the applicants' data shall be anonymised. The applicants' data shall likewise be anonymised if an application is withdrawn whereby the applicants shall be entitled at any time to withdraw their application.

Subject to a justified revocation upon the part of the applicants, the anonymisation shall be undertaken after the passage of a timeframe of six months so that we can answer any follow-up questions in conjunction with the application and fulfil our documentation obligations from the German Equal Opportunity Act. Invoices for any reimbursement of travel costs shall be archived in accordance with the tax law directives.

## 21. Registration Function

Users may set up a user account. During the registration, the required obligatory data fields shall be indicated to the users. The Data inputted during the registration shall be used for the purposes of the usage of the website. The users can be notified via e-mail of the information that is relevant for the website or the registration such as changes in the scope of the website or technical circumstances. If users have cancelled their user account, their Data for the user account shall be deleted unless their storage is required for commercial law or tax law reasons in accordance with Art. 6 Para. 1 lit. c GDPR. In the event that termination is declared, the users shall be responsible for backing up their Data before the contractual agreement ends. We shall be entitled to permanently delete all of the User's Data that have been stored during the contractual term.

During the utilisation of our registration and log-in functions as well as the usage of the user account, we shall store the IP address and the point in time of the respective user's action. The storage shall be undertaken upon the basis of our rightful interests as well as also in order to protect the users from misuse and other unauthorised usage. In principle, a dissemination of these data to third parties shall not be undertaken unless this is required for the assertion of our claims or a valid statutory obligation exists in accordance with Art. 6 Para. 1 lit. c GDPR. The IP addresses shall be anonymised or deleted by no later than 7 days.

## 22. Contacting Us

When contacting us (e.g. via the contact form, e-mail, telephone or via social media), the user's data shall be processed in order to process the contact inquiry and handle the data in accordance with Art.

6 Para. 1 lit. b) GDPR. The data of the users can be stored in a customer relationship management system ("CRM System") or comparable inquiry organisation.

We shall delete the inquiries insofar as they are no longer required. We shall review the necessity thereof every two years; furthermore, the statutory archiving obligations shall be valid.

### 23. Boarding Pass and Guest Reviews

Customers can add other guests' email addresses to a booking.

We will email these guests with details about the booking and request a review. The email addresses will be deleted 3 months after the event.

### 24. Comments and Postings

If users leave comments or other postings (e.g. "reviews"), their IP addresses may be stored for 7 days upon the basis of our rightful interests in accordance with Art. 6 Para. 1 lit. f GDPR. This shall be done for our security if someone leaves illegal content (abusive language, forbidden political propaganda, etc.) among the comments and postings. In this case, we ourselves could be sued or prosecuted for the comment or posting and thus have an interest in finding out the identity of the author.

Moreover, we reserve the right to process the users' Data for the purpose of the identification of spam upon the basis of our rightful interests in accordance with Art. 6 Para. 1 lit. f GDPR.

### 25. Newsletter

By means of the following comments, we shall provide you with detailed information regarding the contents of our newsletter as well as the registration, sending and statistical evaluation processes for the newsletter as well as your rights of objection. By subscribing to our newsletter, you hereby declare your consent to receive the newsletter and to the process described herein.

Content of the newsletter: We shall send the newsletter, e-mails and additional electronic messages with advertising content (hereafter, "Newsletter") only subject to the consent of the recipients or in accordance with a legal permission to do so. Insofar as its contents are concretely outlined during the registration process for the newsletter, they shall be prevailing for the users' consent. Moreover, our Newsletters shall contain information regarding our services and us.

Double opt-in and logging: The registration for our newsletter shall be made in a so-called double opt-in process. That is to say, after registering, you shall receive an e-mail in which you are asked to confirm your registration. This confirmation is required so that nobody can register with third-party e-mail addresses. The registrations for the Newsletter shall be logged in order to be able to document the registration process in accordance with the legal requirements. This shall include the storage of the points in time when registration and confirmation are made as well as also the IP address. The changes to your Data stored by the service provider which handles the sending of the newsletter shall likewise be logged.

Registration Data: In order to register for the Newsletter, it shall suffice if you provide your e-mail address. Optionally, we shall request a name in order to personally address you in the Newsletter.

Germany: The sending of the Newsletter and the measurement of the success attained through it shall be undertaken upon the basis of a consent granted by the recipients in accordance with Art. 6 Para. 1 lit. a, Art. 7 GDPR in conjunction with § 7 Para. 2 No. 3 UWG [**German Fair Trade Practices Act**] and/or upon the basis of the legal permission granted in accordance with § 7 Para. 3 UWG.

The logging of the registration process shall be undertaken upon the basis of our rightful interests in accordance with Art. 6 Para. 1 lit. f GDPR. Our interest lies in the utilisation of a user-friendly as well as secure newsletter system which serves both our business interests as well as also corresponds to the expectations of the users and furthermore enables us to document the consents.

Cancellation/revocation – You may at any time cancel our Newsletter, i.e. revoke your consents. You can find a link for cancelling the Newsletter at the end of each Newsletter. We may store the e-mail addresses of the parties who cancel the Newsletter for up to three years upon the basis of our rightful interests before we delete them in order to be able to document a consent that was previously granted. The Processing of these Data shall be restricted for the purpose of potentially warding off claims. It is possible at any time to submit an individual request for deletion insofar as, at the same time, the previous granting of a consent has been confirmed.

## 26. Service Providers

### 26.1. E-Mail Marketing Service Provider and Customer Service Tickets and Chat (CRM)

#### 26.1.1. Hubspot

As CRM, we can be using a service provider company called Hubspot (25 First Street, 2nd Floor, Cambridge, MA 02141, United States). You can review the data protection provisions of the e-mail marketing service provider here: <https://legal.hubspot.com/privacy-policy> . The e-mail marketing service provider shall be deployed upon the basis of our rightful interests in accordance with Art. 6 Para. 1 lit. f GDPR and a Contracted Data Processing Agreement in accordance with Art. 28 Para. 3 Clause 1 GDPR.

We can be using this CRM to send marketing e-mail messages, in order to process customer service requests (“tickets”), and to provide a chat on our website.

Hubspot is using cookies, small text files that are stored on your computer and allow to analyse the use of the website by you.

Hubspot is certified in accordance with the Privacy Shield Convention and hereby provides a guarantee to follow European data protection law.

(<https://www.privacyshield.gov/participant?id=a2zt0000000TN8pAAG>).

The e-mail marketing service provider may use the Data of the recipients in pseudonymised form, i.e. without any classification of a user, in order to optimise or improve its own services, e.g. for the technical optimisation of the sending and the displaying of the Newsletter or for statistical purposes. However, the e-mail marketing service provider shall not use the Data of our Newsletters’ recipients in order to write them directly on its own or in order to pass on the Data to third parties.

Hubspot may employ a software technology called web beacons (clear gifs /Web Bugs). Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users.

Web beacons allow to determine, for example, whether an email message was opened or whether a user is able to receive html-emails.

The information gathered by clear gifs is not tied to personally identifiable information.

### 26.1.2. Active Campaign

As CRM, we can be using a service provider company called ActiveCampaign (1 North Dearborn Street, 5th floor Chicago, IL 60602). You can review the data protection provisions of the e-mail marketing service provider here: <https://www.activecampaign.com/legal/privacy-policy>. The e-mail marketing service provider shall be deployed upon the basis of our rightful interests in accordance with Art. 6 Para. 1 lit. f GDPR and a Contracted Data Processing Agreement in accordance with Art. 28 Para. 3 Clause 1 GDPR.

We can be using this CRM to send marketing e-mail messages, in order to process customer service requests (“tickets”), and to provide a chat on our website.

ActiveCampaign is using cookies, small text files that are stored on your computer and allow to analyse the use of the website by you.

ActiveCampaign is certified in accordance with the Privacy Shield Convention and hereby provides a guarantee to follow European data protection law.

(<https://www.privacyshield.gov/participant?id=a2zt0000000GnH6AAK>).

The e-mail marketing service provider may use the Data of the recipients in pseudonymised form, i.e. without any classification of a user, in order to optimise or improve its own services, e.g. for the technical optimisation of the sending and the displaying of the Newsletter or for statistical purposes. However, the e-mail marketing service provider shall not use the Data of our Newsletters’ recipients in order to write them directly on its own or in order to pass on the Data to third parties.

ActiveCampaign may employ a software technology called web beacons (clear gifs /Web Bugs). Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users.

Web beacons allow to determine, for example, whether an email message was opened or whether a user is able to receive html-emails.

The information gathered by clear gifs is not tied to personally identifiable information.

### 26.1.3. Zendesk

For our FAQ/Help Centre and also customer service requests (“tickets”), we can use the provider Zendesk (1019 Market St., San Francisco, CA 94103, USA). Whenever you visit our FAQ, you might see in the address in the browser field IF you are on the Zendesk website. The General Business Terms and Conditions and Data Protection Guidelines of Zendesk shall then be applicable. If you use the contact form on Zendesk to contact us, your message will be sent as an e-mail to us.

We can also use this company’s tool to offer a chat service on our website.

You can find Zendesk’s Data Protection Guidelines here:

<https://www.zendesk.de/company/customers-partners/privacy-policy/>

## 26.2. Transaction E-Mail Service Provider

Transactional e-mail messages (e.g. booking confirmation) can be sent via the e-mail service Postmark. Postmark is a service of Wildbit LLC (225 Chestnut Street, Philadelphia, PA 19106, United States). You can review the data protection provisions of the e-mail service provider here:

<https://wildbit.com/privacy-policy>. The e-mail service provider shall be deployed upon the basis of our rightful interests in accordance with Art. 6 Para. 1 lit. f GDPR and a Contracted Data Processing Agreement in accordance with Art. 28 Para. 3 Clause 1 GDPR.

Wildbit is certified in accordance with the Privacy Shield Convention and hereby provides a guarantee to follow European data protection law. (<https://www.privacyshield.gov/>).

The e-mail service provider may use the Data of the recipients in pseudonymised form, i.e. without any classification of a user, in order to optimise or improve its own services, e.g. for the technical optimisation of the sending and the displaying of the messages or for statistical purposes. However, the e-mail service provider shall not use the Data of our messages' recipients in order to write them directly on its own or in order to pass on the Data to third parties.

Postmark may employ a software technology called web beacons (clear gifs /Web Bugs). Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users.

Web beacons allow to determine, for example, whether an email message was opened or whether a user is able to receive html-emails.

The information gathered by clear gifs is not tied to personally identifiable information.

## 26.3. Jetpack (WordPress Stats)

We shall, upon the basis of our rightful interests (i.e. interest in the analysis, optimisation and commercial operation of our Online Offer in accordance with Art. 6 Para. 1 lit. f GDPR), use the Jetpack plug-in (in this case, the "Wordpress Stats" sub-function), which integrates a tool for the statistical analysis of visitor accesses and is provided by Automattic Inc., 60 29th Street #343, San Francisco, CA 94110, USA. Jetpack uses so-called "cookies"—text files which are stored on your computer and which enable an analysis of your usage of the website.

The information generated by the cookie regarding your usage of this Online Offer shall be stored on a server in the USA. In this regard, usage profiles for the users can be created from the processed data where they are utilised only for analytical purposes and not for advertising purposes. You can obtain additional information in the Privacy policies of Automattic: <https://automattic.com/privacy/> and comments regarding Jetpack cookies: <https://jetpack.com/support/cookies/>.

## 26.4. Google Tag Manager

We shall, upon the basis of our rightful interests (i.e. interest in the analysis, optimisation and commercial operation of our Online Offer in accordance with Art. 6 Para. 1 lit. f GDPR), utilise Google TagManager, a tool from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

Google is certified in accordance with the Privacy Shield Convention and hereby provides a guarantee to follow European data protection law (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

Google Tag Manager is a service that allows marketed website tags to be managed using an interface. Tags are small code elements that help to measure and analyse web traffic, user behaviour, the effectiveness of online marketing and of marketing channels, to make use of re-marketing and focus on target groups, and to test and optimise our website.

The Tag Manager tool itself (which implements the tags) is a cookie-less domain and does not register personal data.

More information can be found here:

<http://www.google.de/tagmanager/faq.html>

<http://www.google.de/tagmanager/use-policy.html>

## 26.5. Google Adwords

We shall, upon the basis of our rightful interests (i.e. interest in the analysis, optimisation and commercial operation of our Online Offer in accordance with Art. 6 Para. 1 lit. f GDPR), utilise Google Adwords, a tool from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

Google is certified in accordance with the Privacy Shield Convention and hereby provides a guarantee to follow European data protection law (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

To market our services, we are using google ad words and for this reason google's conversion tracking for a personalized, interest based and location related online marketing.

We have enabled adwords' IP-anonymization settings to ensure anonymisation.

The ads will be displayed after searches on one of the sites of the google advertising network.

It is possible for us to combine our ads with certain search requests. Cookies help us to display ads based on previous visits of a user on our website. With clicking on the ad, a cookie will be stored on your computer.

This technology is used to inform google and us as a customer of google that a user clicked on an ad and was directed to our website. The gained information will be used solely for a statistical analysis to optimize our ads.

We are not receiving information that allow us to identify an individual user. The reports from google include the total number of visitors that clicked on an ad and whether they were forwarded to one of our pages that include a conversion tag.

Based on these statistics, we can measure how often our ads were clicked and which of these ads lead to a contact or a booking by a user.

Regularly, we are comparing these booking data with our anonymised booking data. For this reason, we are sending our internal booking ID and other relevant information (e.g. the booking value) to google in the event of a booking, making contact, or other activity on our website. This information is only used for statistical reasons and not accessible for others.

If you do not want that cookies are being stored for this purpose, you could, for example, deactivate cookies in your browser's settings. In this case, your visit is not recorded in the statistics.

You could also choose to change the type of ads that you see or to deactivate personalized advertising in the preferences on google's website (<https://adssettings.google.com/authenticated>).

Alternatively, you can deactivate cookies by third party with the opt-out tool of the networkadvertising initiative (<http://optout.networkadvertising.org/?c=1#!/>).

Nevertheless, google and us will still receive statistical data on the number of users that visited our website. If you do not want to be part of this statistic, you can use additional programs for your browser (e.g. the tool Ghostery).

Additional information on this topic can be found here: (<https://support.google.com/adwords#topic=3119071>).

If you do not want to receive any personalized advertisement from us on other web pages, please deactivate this feature on google's site. (<https://support.google.com/ads/answer/2662922?hl=de>).

## 26.6. Google Analytics

We shall, upon the basis of our rightful interests (i.e. interest in the analysis, optimisation and commercial operation of our Online Offer in accordance with Art. 6 Para. 1 lit. f GDPR), utilise Google Analytics, a web analysis service from Google LLC ("Google"). Google uses cookies. As a rule, the information generated via the cookie regarding the usage of the Online Offer by the users shall be transmitted to a Google server in the USA and stored there.

Google is certified in accordance with the Privacy Shield Convention and hereby provides a guarantee to follow European data protection law (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>).

In accordance with our mandate, Google shall use this information in order to analyse the usage of our Online Offer by the user, in order to compile reports regarding the activities within this Online Offer and in order to render additional services associated with the usage of this Online Offer and the Internet for us. In this regard, pseudonymised usage profiles of the users can be created from the processed Data.

We use Google Analytics only with activated IP anonymisation. That means that the IP address of the users is shortened by Google within the member countries of the European Union or in other contracting countries to the European Economic Area Convention. Only in exceptional cases shall the full IP address be transmitted to a Google server in the USA and shortened there.

The IP address transmitted by the user's browser shall not be commingled with other data by Google. The users can prevent the storage of cookies by correspondingly adjusting the settings on their browser software; moreover, the users can prevent the collection of the data generated by the cookie and referring to their usage of the Online Offer from being sent to Google as well as the Processing of these Data by Google by downloading and installing the browser plug-in which is available by clicking on the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

You can find additional information regarding the usage of the Data by Google as well as setting options and right of objection options in Google's Privacy policy (<https://policies.google.com/technologies/ads>) as well as in the settings for the displaying of advertisements by Google (<https://adssettings.google.com/authenticated>).

The users' personal data shall be deleted or anonymised after 14 months.

#### 26.7. Online Presences in Social Media

We maintain online presences within social networks and platforms in order to communicate with the customers, prospective customers and users who are active there and in order to be able to inform them there of our services. When visiting the respective networks and platforms, the General Business Terms and Conditions and the Data Processing Guidelines of the respective operators shall be valid.

Insofar as nothing to the contrary has been stated in our Privacy policy, we shall process the users' Data insofar as they communicate with us within the social networks and platforms, e.g. make postings on our online presences or send us messages there.

#### 26.8. Integration of Services and Third-Party Content

We shall, within our Online Offer and upon the basis of our rightful interests (i.e. interest in the analysis, optimisation and commercial operation of our Online Offer in accordance with Art. 6 Para. 1 lit. f GDPR), utilise content or service offerings from third-party providers in order to integrate their content and services, e.g. videos or typefaces (hereafter uniformly referred to as "Content").

This always requires that the third-party providers of these contents use the IP address of the users because they could not send the contents to their browser without the IP address. The IP address is thus required for the displaying of these contents. We shall endeavour to use only such contents whose respective providers use the IP address merely for the supplying of the content. Furthermore, third-party providers can use so-called pixel tags (invisible graphics also referred to as "web beacons") for statistical or marketing purposes. Via the "pixel tags", information can be analysed such as the number of visitors to the pages of this website. Furthermore, the pseudonymised information can be stored in cookies on the users' device and contain, among other things, technical information regarding the browser and operating system, referring websites, time of the visit as well as additional information regarding the use of our Online Offer as well as also which is associated with such information from other sources.

#### 26.9. YouTube

On the website, we create links to videos from the "YouTube" platform from the provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy policy: <https://www.google.com/policies/privacy/>, opt-out: <https://adssettings.google.com/authenticated>.

#### 26.10. Google Fonts

We integrate the fonts ("Google Fonts") from the provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Privacy policy: <https://www.google.com/policies/privacy/>, opt-out: <https://adssettings.google.com/authenticated>.



#### 26.11. Here Maps

This site uses the map service HERE Maps via an API. Provider is HERE Global B.V., Kennedyplein 222 - 226, 5611 ZT Eindhoven, The Netherlands.

To use the features of HERE Maps, it is necessary to store your IP address. This information is usually transferred to a server of HERE Global B.V. and stored there. The provider of this site has no influence on this data transmission. The use of HERE Maps is in the interest of an attractive presentation of our online offers and to make it easy to find the locations on the website. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR.

For more information on the handling of user data, please refer to the HERE Global B.V. privacy policy: <https://legal.here.com/de-de/privacy/policy/>.

#### 26.12. Google Maps

We also could integrate the maps from the "Google Maps" service from the provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The processed data may include particularly the IP addresses and locational data of the users which nonetheless shall not be collected without their consent (as a rule, implemented via the settings on their mobile devices). The Data may be processed in the USA. Privacy policy: <https://www.google.com/policies/privacy/>.

#### 26.13. Invoice Payment/Billie

We offer the option of paying the invoice amount by bank transfer ("Invoice Payment"). In order to be able to make you this offer, we cooperate with the financial service provider Billie GmbH, Charlottenstraße 4, 10969 Berlin, Germany. After a successful address and credit check during the ordering process and after placing the order, we assign our claim to Billie GmbH. P. The privacy policy of Billie GmbH can be found here: <https://www.billie.io/datenschutz/kar/>. It applies in addition to our privacy policy and our general terms and conditions.