

Data protection declaration Compagna Basel, STEINENSCHANZE Stadthotel, 4051 Basel

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1. Person responsible and content of this data protection declaration

We, Compagna Basel, 4051 Basel, operate the hotel STEINENSCHANZE Stadthotel and the website www.steinenschanze.ch (**website**) and, unless otherwise stated in this data protection declaration, are responsible for the data listed in this data protection declaration Data processing.

So that you know what personal data we collect from you and for what purposes we use it, please read the information below. When it comes to data protection, we are primarily guided by the legal requirements of Swiss data protection law, in particular the Federal Data Protection Act (FADP) and the GDPR, the provisions of which may be applicable in individual cases.

Please note that the information below is reviewed and changed from time to time. We therefore recommend that you view this data protection declaration regularly. Furthermore, other companies are responsible under data protection law for individual data processing listed below or are jointly responsible with us, so that the information from these providers is also decisive in these cases.

2. Contact person for data protection

If you have any questions about data protection or would like to exercise your rights, please contact our contact person for data protection by sending an

email to the following address: datenschutz@steinenschanze.ch You can contact our EU data protection representative at: Steinenschanze Stadthotel, Steinengraben 69, 4051 Basel, datenschutz@steinenschanze.ch

3. Scope and purpose of the collection, processing and use of personal data

3.1 Data processing when contacting us

If you contact us via our contact addresses and channels (e.g. email, telephone or contact form), your personal data will be processed. The data that you have made available to us, such as your name, your e-mail address or telephone number and your request, will be processed. In addition, the time of receipt of the request is documented. Mandatory information is marked with an asterisk (*) in contact forms. We process this data in order to implement your request (e.g. providing information about our hotel, support in contract processing such as questions about your booking, including your feedback in improving our services, etc.).

We use a software application from **ennit interactive GmbH**, Gerhard-Fröhler-Str. 14, 24106 Kiel. Therefore, your data will be stored in a database of **ennit interactive GmbH**, which can enable **ennit interactive GmbH** to access your data if this is necessary for the provision of the software and for support in using the software. Information about the processing of data by third parties and any transmission abroad can be found under Section 4 of this data protection declaration.

The legal basis for this data processing is our legitimate interest within the meaning of Article 6 Para. 1 lit. f GDPR in the implementation of your request or, if your request is aimed at concluding or processing a contract, the necessity for the implementation of the necessary measures within the meaning of Article 6 Paragraph 1 Letter b GDPR.

It may be that **ennit interactive GmbH** would like to use some of this data for its own purposes (e.g. to deliver marketing emails or for statistical analyses). **ennit interactive GmbH** is responsible for this data processing and must ensure compliance with data protection laws in connection with this data processing. Information about data processing **by ennit interactive GmbH** can be found at <https://www.ennit.de/datenschutz/>.

3.2 Data processing during bookings

3.2.1 Booking via our website

On our website you have the opportunity to book an overnight stay. For this purpose, we collect the following data, whereby mandatory information during the booking process is marked with an asterisk (*):

- Salutation
- First name
- Last name
- Birthday
- Fellow traveller
- Billing address
- phone number
- Email -
- Method of payment
- Booking details
- Remarks -

Confirmation of the accuracy of the information provided - Confirmation of knowledge and agreement regarding general terms and conditions and data protection regulations

We use the data to determine your identity before concluding a contract. We need your email address to confirm your booking and for future communication with you that is necessary for contract processing. We store your data together with the marginal data of the booking (e.g. room category, period of stay as well as name, price

and characteristics of the services), the payment data (e.g. selected payment method, confirmation of payment and time; see also section 0) as well as the information on the processing and fulfillment of the contract (e.g. receipt of and handling of complaints) in our CRM database (see section Error! Reference source could not be found.) so that we can ensure correct booking processing and contract fulfillment.

To the extent that this is necessary for the fulfillment of the contract, we will also pass on the required information to any third-party service providers (e.g. event organizers or transport companies).

The legal basis for data processing is the fulfillment of a contract with you in accordance with Article 6 (1) (f) GDPR. Providing data that is not marked as

mandatory is voluntary. We process this data in order to tailor our offer to your personal needs as best as possible, to facilitate the processing of contracts, to contact you via an alternative communication channel if necessary, with a view to fulfilling the contract or for statistical recording and evaluation in order to optimize our services Offers.

The legal basis for data processing is your consent within the meaning of Art. 6 Para. 1 lit. f GDPR. You can revoke your consent at any time by notifying us.

We use a software application from Zucchetti Hospitality S.r.l. to process bookings via our website. - P.IVA 02894171202, verticalbooking. Therefore, your data will be stored in a database of Zucchetti Hospitality S.r.l. - P.IVA 02894171202, verticalbooking, which Zucchetti Hospitality S.r.l. - P.IVA 02894171202, verticalbooking. may enable access to your data if this is necessary to provide the software and to support you in using the software. You can find information about the processing of data by third parties and any transfer abroad under section 4 of this data protection declaration. The legal basis for data processing is the fulfillment of a contract with you in accordance with Article 6 (1) (f) GDPR. It may be that Zucchetti Hospitality S.r.l. - P.IVA 02894171202, verticalbooking would like to use some of this data for its own purposes (e.g. to deliver marketing emails or for statistical analyses). Zucchetti Hospitality S.r.l. is responsible for this data processing. - P.IVA 02894171202, verticalbooking controller and must ensure compliance with data protection laws in connection with these data processing operations. Information about data processing by Zucchetti Hospitality S.r.l. - P.IVA 02894171202, verticalbooking. can be found at <https://www.simplebooking.it/ibe/hotelbooking/search?hid=3946&lang=de>

3.2.2 Booking via a booking platform

If you make bookings via a third-party platform (i.e. via Booking, Hotel, Escapio, Expedia, Holi-daycheck, Hotel Tonight, HRS, Kayak, Mr. & Mrs. Smith, Splendia, Tablet Hotels, Tripadvisor, Tri-vago, Weekend4Two etc.) We receive various personal data from the respective platform operator in connection with the booking made. It This is usually the data listed in Section 0 of this data protection declaration. In addition, we may be forwarded inquiries about your booking. We will process this data specifically in order to record your booking as requested and to provide the booked services.

The legal basis for data processing for this purpose is the implementation of pre-contractual measures and the fulfillment of a contract in accordance with Article 6 (1) (b) GDPR.

Finally, we may exchange personal data with the platform operators in connection with disputes or complaints in connection with a booking, to the extent that this is necessary to protect our legitimate interests. This may also include data relating to the booking process on the platform or data relating to

the booking or processing of services and the stay with us. We process this data to protect our legitimate claims and interests in the processing and maintenance of our contractual relationships with the following platform operators:

- BOOKING.COM, Booking.com B.V. Oosterdokskade 163, 1011 DL Niederlande, **Postanschrift:** Postbus 1639, 1000 BP, Niederlande
<https://admin.booking.com/hotel/hoteladmin/privacy.html?ses=e2e3ecdf42e96e62af303c85e3cb7bf8&lang=de>
- HRS GmbH, Breslauer Platz 4, 50668 Köln, Deutschland,
<https://hotelservice.hrs.com/portal/login.xhtml;jsessionid=9A2B85D7732250F8D4C88E2320C6DDE0.11-1?lang=de>
- AGODA Company Pte Ltd., 30 Cecil Street 19-08, Prudential Tower Singapore, 049712 Singapore,
<https://ycs.agoda.com/de-de/kipp/app/help/PrivacyPolicys/18986527>
- EXPEDIA Group, Landshuter Allee 10, 80637 München
https://welcome.expediagroup.com/de/privacy-policy?mode=partner&experience=join&_ga=2.159082234.1145089974.1692773478-1071004333.1691822802
- SimpleBOOKING, Via Lucca, 52, 50142 Firenze FI, Italy
<https://backofficev4.simplebooking.it/Privacy/GdprAndPrivacy?hotelId=3946>
- SYNXIS, Nettohotel Srl, Piazza Della Repubblica 9- 20121 Milano P.IVA/C.F. 05355610964 - REA MILANO 1815839,
<https://controlcenter-p1.synxis.com/CC/login.aspx?ReturnUrl=%2fcc%2fdefault.aspx>
- TripAdvisor LLC, 400 1st Avenue, Needham, MA 02494, USA,
<https://www.tripadvisor.com>

Your data is stored in the platform operators' databases, which allows them access to your data. You can find information about the processing of data by third parties and any transfer abroad under section 4 of this data protection declaration. The legal basis for data processing for this purpose lies in our legitimate interest within the meaning of Article 6 (1) (f) GDPR.

3.3 Data processing during payment processing

3.3.1 Payment processing in the hotel

If you purchase products, obtain services or pay for your stay in our hotel using electronic payment methods, the processing of personal data is necessary. By using the payment terminals, you transmit the information stored in your payment method, such as the name of the cardholder and the card number, to the payment service providers involved (e.g. providers of payment solutions, credit card issuers and credit card acquirers). They also receive information that the payment method was used in our hotel, the amount and the time of the transaction. Conversely, we only receive a credit for the amount of the payment made at the relevant time, which we can assign to the relevant document number, or information that the transaction was not possible or was cancelled. Always pay attention to the information provided by the respective company, in particular the data protection declaration and the general terms and conditions.

To process payments using the contact form, we use a software application from Worldline, Hardturmstrasse 201, 8021 Zurich, Switzerland. Therefore, your data may be stored in a Worldline database, which may enable Worldline to access your data if this is necessary to provide the software and to support the use of the software. You can find information about the processing of data by third parties and any transfer abroad under section 4 of this data protection declaration.

The legal basis for our data processing is the fulfillment of a contract with you in accordance with Article 6 (1) (b) GDPR.

It may be that Worldline would like to use some of this data for its own purposes (e.g. to deliver marketing emails or for statistical analyses). [Company] is responsible for this data processing and must ensure compliance with data protection laws in connection with this data processing. Information about data processing by Worldline can be found at www.six-payment-services.com/de/home/contacts.

Online payment processing

If you make paid bookings or order services or products on our website, depending on the product or service and the desired payment method - in addition to the information mentioned in Section 3.2.1 - you will be required to provide further data, such as your credit card information or your login Payment service provider. This information, as well as the fact that you have purchased a service from us for the relevant amount and time, will be forwarded to the respective payment service providers (e.g. providers of payment solutions, credit card issuers and credit card acquirers). Always pay attention to the information provided by the respective company, in particular the data protection declaration and the general terms and conditions.

The legal basis for our data processing is the fulfillment of a contract in accordance with Article 6 (1) (b) GDPR.

We reserve the right to store a copy of the credit card information as security. In order to avoid payment cases, the necessary data, in particular your personal details, can also be transmitted to a credit agency for an automated assessment of your creditworthiness. In this context, the credit agency can assign you a so-called score value. This is an estimate of the future risk of non-payment, e.g. based on a percentage. The value is collected using mathematical-statistical methods and including data from the credit agency from other sources. According to the information received, we reserve the right not to offer you the "invoice" payment method.

The legal basis for our data processing is our legitimate interest in preventing payment defaults in accordance with Article 6 Paragraph 1 Letter b of the GDPR

To check your creditworthiness using the contact form, we use a software application from Worldline, Hardturmstrasse 201, 8021 Zurich, Switzerland. Therefore, your data may be stored in a Worldline database, which may enable Worldline to access your data if this is necessary to provide the software and to support the use of the software. You can find information about the processing of data by third parties and any transfer abroad under section 4 of this data protection declaration.

The legal basis for our data processing is our legitimate interest in preventing payment defaults in accordance with Article 6 Paragraph 1 Letter b of the GDPR

It may be that Worldline would like to use some of this data for its own purposes (e.g. to deliver marketing emails or for statistical analyses). Worldline is responsible for this data processing and must ensure compliance with data protection laws in connection with this data processing. Information about data processing by Worldline can be found at www.six-payment-services.com/de/home/contacts.

Data processing in the collection and billing of purchased services

If you receive services as part of your stay (e.g. additional overnight stays, wellness, restaurant, activities), - in addition to your contractual data - the data of the booking (e.g. time and comments) as well as the data about the booked and purchased service (e.g. subject of the service, price and Time of receipt of the service) recorded and further processed by us to process the service, as in sections 3.2 described.

The legal basis for our data processing lies in the fulfillment of a contract in accordance with Article 6 Paragraph 1 Letter b GDPR.

By registering, you consent to the processing of this data in order to receive marketing emails from us about our hotel and related information about products and services. These marketing emails may also include invitations to participate in competitions, to provide feedback or to rate our products and

services. The collection of the salutation and the first and last name allows us to process the data when submitting reviews

In order to help other users with their decision and to support our quality management (especially when processing negative feedback), you have the opportunity to rate your stay with us on our website. The data that you have provided to us will be processed and published on the website, i.e. in addition to your review and its timing, possibly also a comment that you have attached to your review or the name you have provided.

The legal basis for data processing is your consent within the meaning of Art. 6 Para. 1 lit a GDPR. You can revoke your consent at any time and request that your review be anonymized.

We reserve the right to delete unlawful reviews and, if we suspect anything, to contact you and ask you to comment.

The legal basis for this processing is our legitimate interest within the meaning of Article 6 Paragraph 1 Letter f of the GDPR in providing a lawful and genuine comment and rating function and in preventing misuse when using it.

3.4 Data processing when providing guest feedback

During your stay or afterwards, you have the opportunity to give us feedback (e.g. praise, criticism and suggestions for improvement) using a form. For this purpose, we collect the following data - depending on the situation - whereby mandatory information is marked with an asterisk (*) in the relevant form:

- First and last name
- Age
- Nationality
- Duration of stay
- Feedback

Your data is processed as part of our quality management and ultimately for the purpose of better aligning our services and products to the needs of our guests. Specifically, your data will be processed for the following purposes:

- Clarification of your concerns, i.e. e.g. obtaining statements from the employees and superiors addressed or asking you questions, etc.;
- Evaluation and analysis of your information, e.g. creation of satisfaction statistics, comparison of individual services, etc.; or

- Taking organizational measures based on the knowledge gained, e.g. correcting grievances/deficits/misbehavior, for example by repairing defective systems, giving instructions and praising or admonishing employees.

3.5 In connection with guest feedback, we use a software application from rebag-data ag, Einsiedlerstrasse 533, PO Box 426, CH-8810 Horgen. Therefore, your data will be stored in a rebagdata ag database, which can enable rebagdata ag to access your data if this is necessary for the provision of the software and for support in the use of the software. You can find information about the processing of data by third parties and any transfer abroad under section 4.2 of this data protection declaration.

The legal basis for this processing lies in your consent in accordance with Article 6 Paragraph 1 Letter a of the GDPR. You can revoke this consent at any time in the future.

It may be that rebagdata ag would like to use some of this data for its own purposes (e.g. to deliver marketing emails or for statistical analyses). rebagdata ag is responsible for this data processing and must ensure compliance with data protection laws in connection with this data processing. Information about data processing by rebagdata ag can be found at <https://rebag.ch/datenschutzerklaerung/>

Data processing in video surveillance

To protect our guests and employees as well as our property and to prevent and punish illegal behavior (especially theft and damage to property), the entrance area and the supplier entrance to our hotel, with the exception of the sanitary facilities, can be monitored by cameras. The image data will only be viewed if there is suspicion of illegal behavior. Otherwise, the image recordings will be automatically deleted after [48] hours. This is a pure form of video recording. A video surveillance system from a third-party service provider does not apply. We will only access the data if the suspicion of illegal behavior is confirmed. The data can then be passed on to consulting companies (in particular to a law firm) and authorities to the extent necessary to enforce claims or to file reports. You can find information about the processing of data by third parties and any transfer abroad under section 4 of this data protection declaration.

The legal basis is our legitimate interest within the meaning of Article 6 Paragraph 1 Letter f of the GDPR in protecting our guests, our employees and our property as well as in protecting and enforcing our rights.

3.6 Data processing when using our WiFi network

In our hotel you have the opportunity to use the WiFi network operated by Schneider Computer Services, Gstatenstrasse 20, 4416 Bubendorf, Switzerland [free of charge]. To prevent abuse and punish illegal behavior, prior registration is required. In doing so, you transmit the following data to Schneider Computer Services

- Mobile phone number
- MAC address of the end device (automatic

) In addition to the above data, data about the time and date of use, the network used and the device are collected every time the WiFi network is used. The legal basis for this processing is your consent within the meaning of Art. 6 Para. 1 lit. a GDPR. You can revoke this consent at any time in the future.

Schneider Computer Services is responsible for this data processing. As part of the registration, you give your consent to Schneider Computer Services and must accept the terms of use and the privacy policy of Schneider Computer Services. Schneider Computer Services must comply with the legal obligations of the federal law regarding the monitoring of postal and telecommunications traffic (BÜPF) and the associated regulations. If the legal requirements are met, the operator of the WiFi network must monitor the use of the Internet and data traffic on behalf of the responsible authority. The operator of the WiFi network may be further obliged to disclose the hotel guest's contact, usage and peripheral data to the authorized authorities. The contact, usage and peripheral data are stored for 6 months and then deleted.

The legal basis for this processing is our legitimate interest within the meaning of Article 6 (1) (f) GDPR in providing a WiFi network in compliance with the applicable legal regulations.

3.7 Data processing when fulfilling legal reporting obligations

When you arrive at our hotel, we may require the following information from you and your accompanying persons, whereby mandatory information is marked with an asterisk (*) on the relevant form:

- Arrival *
- Departure *
- First and last name*

- Billing address*
 - Date of birth*
 - Nationality*
 - Email address*
 - Birthday*
 - Reason for travel*
-
- Number of travelers *
 - Billing address for company address
 - Additional information about preferences

We collect this information to fulfill legal reporting obligations, which arise in particular from hospitality or police law. If we are obliged to do so according to the applicable regulations, we will forward this information to the responsible authority.

The legal basis for processing this data is our legitimate interest within the meaning of Article 6 Paragraph 1 Letter c GDPR in compliance with our legal obligations.

4. Disclosure and transmission abroad

4.1 Disclosure to third parties and access to third parties

Without the support of other companies we would not be able to provide our offerings in the desired form. In order for us to be able to use the services of these companies, it is also necessary to pass on your personal data to these companies to a certain extent. Data is passed on to selected third-party service providers and only to the extent necessary for the optimal provision of our services.

Various third-party service providers are already explicitly mentioned in this data protection declaration. These are also the following service providers:

ennit interactive GmbH, Gerhard-Fröhler-Str. 14, 24106 Kiel.

Further information about data processing in connection with ennit interactive GmbH can be found at <https://www.ennit.de/datenschutz/>.

The legal basis for these transfers is the necessity to fulfill a contract within the meaning of Article 6 (1) (b) GDPR. Your data will also be passed on to the extent

that this is necessary to provide the services you have requested, i.e. for example to restaurants or providers of other services for which you have made a reservation through us. The legal basis for these transfers is the necessity to fulfill a contract within the meaning of Article 6 (1) (b) GDPR. The third-party service providers are responsible for this data processing within the meaning of the Data Protection Act and not we. It is the task of these third-party service providers to inform you about their own data processing - which goes beyond the transfer of data for the provision of services - and to comply with data protection laws.

In addition, your data may be passed on, in particular to authorities, legal advisors or debt collection companies, if we are legally obliged to do so or if this is necessary to protect our rights, in particular to enforce claims arising from our relationship with you. Data may also be shared if another company intends to acquire our company or part of it and such sharing is necessary to conduct due diligence or complete the transaction.

The legal basis for this data processing is our legitimate interest within the meaning of Article 6 Paragraph 1 Letter f of the GDPR in protecting our rights and complying with our obligations or the sale of our company or shares there.

4.2 Transfer of personal data abroad

We are entitled to transfer your personal data to third parties abroad if this is necessary to carry out the data processing mentioned in this data protection declaration. Individual data transfers have been mentioned above in section 3. The legal regulations regarding the disclosure of personal data to third parties are of course complied with. The states to which data is transferred include those that have an adequate level of data protection in accordance with a decision by the Federal Council and the EU Commission (such as the member states of the EEA or, from the EU's perspective, Switzerland), but also others Countries (such as the USA) whose level of data protection is not considered adequate (see Appendix 1 of the Data Protection Regulation (DSV) and the EU Commission website ([Webseite der EU-Kommission](#))). If the country in question does not have an adequate level of data protection, we ensure that your data is adequately protected by these companies, unless an exception is stated in individual cases (see Art. 49 GDPR) for individual data processing are. Unless otherwise stated, these are standard contractual clauses within the meaning of Article 46 (2) (c) GDPR, which can be accessed on the websites of the Federal Data Protection and Information Commissioner (FDPIC) des [Eidg. Datenschutz- und Öffentlichkeitsbeauftragten \(EDÖB\)](#) and the EU Commission [EU-Kommission](#). If you have any questions about the measures taken, please contact our contact person for data protection (see section 2).

4.3 Information on data transfers to the USA

Some of the third-party service providers named in this data protection declaration are based in the USA. For reasons of completeness, we would like to

point out to users residing or based in Switzerland or the EU that there are surveillance measures in place by US authorities in the USA, which generally require the storage of all personal data of all persons whose data comes from Switzerland or . from the EU to the USA. This is done without differentiation, restriction or exception based on the objective pursued and without any objective criterion that makes it possible to limit the US authorities' access to the data and their subsequent use to very specific, strictly limited purposes be able to justify the interference associated with both access to and use of this data. We would also like to point out that in the USA there are no legal remedies or effective legal protection against general access rights of US authorities for data subjects from Switzerland or the EU, which allow them to access the data concerning them received and to obtain their correction or deletion. We explicitly draw your attention to this legal and factual situation in order to enable you to make an appropriately informed decision to consent to the use of your data.

We would also like to point out to users residing in Switzerland or a member state of the EU that from the perspective of the European Union and Switzerland - due, among other things, to the statements made in this section - the USA does not have an adequate level of data protection. To the extent that we have explained in this data protection declaration that recipients of data (such as Google) are based in the USA, we will ensure through contractual arrangements with these companies and, if necessary, additional appropriate guarantees that your data is appropriately stored by our third-party service providers are protected.

5. Background data processing on our website

5.1 Data processing when you visit our website (log file data)

When you visit our website, the servers of our hosting provider, Hetzner Online GmbH, Industriestr. 25, 91710 Gunzenhausen, Germany, temporarily records every access in a log file. The following data is collected without your intervention and stored by us until it is automatically deleted:

- IP address of the requesting computer;
- Date and time of access;
- Name and URL of the retrieved file;
- Website from which access was made, possibly with the search term used;
- Operating system of your computer and the browser you use (including type, version and language setting);
- Device type in case of access via mobile phones;
- City or region from where the access took place; and

- Name of your Internet access provider.

This data is collected and processed for the purpose of enabling the use of our website (establishing a connection), ensuring long-term system security and stability, and enabling error and performance analysis and optimization of our website (see the last points also section 5.4).

In the event of an attack on the network infrastructure of the website or if there is suspicion of other unauthorized or abusive use of the website, the IP address and other data will be evaluated for clarification and defense purposes and, if necessary, as part of civil or criminal proceedings for identification against the person used by the relevant user.

Our legitimate interest in the purposes described above is within the meaning of Article 6 Paragraph 1 Letter f of the GDPR and thus the legal basis for data processing. Finally, when you visit our website, we use cookies as well as applications and tools that are based on the use of cookies. In this context, the data described here can also be processed.

Further information on this can be found in the following sections of this data protection declaration, in particular section 5.2 below.

5.2 Cookies

Cookies are information files that your web browser stores on your computer's hard drive or memory when you visit our website. Cookies are assigned identification numbers that identify your browser and allow the information contained in the cookie to be read.

Cookies help, among other things, to make your visit to our website easier, more pleasant and more useful. We use cookies for various purposes that are necessary for your desired use of the website, i.e. "technically necessary". For example, we use cookies to be able to identify you as a registered user after you log in, without you having to log in again each time you navigate on the various subpages. The provision of the ordering and booking functions is also based on the use of cookies. Cookies also take on other technical functions required for the operation of the website, such as so-called load balancing, i.e. the distribution of the site's performance load across different web servers in order to relieve the load on the servers. Cookies are also used for security purposes, for example to prevent unauthorized posting of content. Finally, we also use cookies as part of the design and programming of our website, e.g. to enable the uploading of scripts or codes.

The legal basis for this data processing is our legitimate interest within the meaning of Article 6 (1) (f) GDPR in providing a user-friendly and up-to-date website.

Most internet browsers automatically accept cookies. However, when you access our website, we ask you for your consent to the cookies we use that are

not technically necessary, in particular when using third-party cookies for marketing purposes.

You can make your desired settings using the corresponding buttons in the cookie banner. Details about the services and data processing associated with the individual cookies can be found within the cookie banner and in the following sections of this data protection declaration. You may also be able to configure your browser so that no cookies are stored on your computer or a message always appears when you receive a new cookie. On the following pages you will find explanations of how you can configure the processing of cookies in selected browsers.

- [Google Chrome für Desktop](#)
- [Google Chrome für Mobile](#)
- [Apple Safari](#)
- [Microsoft Windows Internet Explorer](#)
- [Microsoft Windows Internet Explorer Mobile](#)
- [Mozilla Firefox](#)

Deactivating cookies may mean that you cannot use all functions of our website.

5.3 Google Custom Search Engine

This website uses the [Programmable Search Engine](#) from Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA (Google). This enables us to provide you with an efficient search function on our website.

By pressing the enter key or clicking on the search button, the search function is activated and the search results from Google are displayed on the search results page using an embedding (iFrame). When retrieving the search results, a connection is established with Google servers and your browser may send the log file data listed under section 5.1 (including IP address) as well as the search term you entered to Google. This may also result in data being transferred to servers abroad, e.g. the USA (see, in particular, the lack of an adequate level of data protection and the guarantees provided, Sections 4.2 and 4.3).

The legal basis for this data processing is our legitimate interest within the meaning of Article 6 (1) (f) GDPR in providing an efficient website search function.

For further processing of the data by Google, please note Google's data protection regulations: www.google.com/intl/de_de/policies/privacy.

5.4 Tracking and web analysis tools

5.4.1 General information about tracking

For the purpose of needs-based design and ongoing optimization of our website, we use the web analysis services listed below. In this context, pseudonymized usage profiles are created and cookies are used (please also note section 5.2). The information generated by the cookie about your use of this website is usually transmitted to a server of the service provider together with the log file data listed in section 5.1, where it is stored and processed. This may also result in a transfer to servers abroad, e.g. the USA (see, in particular, the lack of an appropriate level of data protection and the guarantees provided, Sections 4.2 and 4.3).

By processing the data, we receive, among other things, the following information:

- Navigation path that a visitor follows on the site (including content viewed and products selected or purchased or services booked);
 - Duration of stay on the website or subpage;
 - Subpage on which the website is left;
 - Country, region or city from where access occurs;
 - End device (type, version, color depth, resolution, width and height of the browser window);
- and - returning or new visitor.

On our behalf, the provider will use this information to evaluate the use of the website, in particular to compile website activities and to provide other services related to website use and internet use for the purposes of market research and needs-based design of these websites. For this processing, we and the providers can be viewed as jointly responsible under data protection law to a certain extent.

The legal basis for this data processing with the following services is your consent within the meaning of Art. 6 Para. 1 lit. a GDPR. You can revoke your consent or refuse processing at any time by rejecting or switching off the relevant cookies in the settings of your web browser (see Section 5.2) or by using the service-specific options described below. For further processing of the data by the respective provider as the (sole) person responsible for data protection, in particular any possible transfer of this information to third parties, such as to authorities based on national legal regulations, please note the respective data protection information of the provider.

5.4.2 Google Analytics

We use the web analysis service Google Analytics from Google Ireland Limited (Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland) or Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA (Google).

Contrary to the description in Section 5.4.1, IP addresses are not logged or stored in Google Analytics (in the version “Google Analytics 4” used here). For access from the EU, IP address data is only used to derive location data and is then deleted immediately. When collecting measurement data in Google Analytics, all IP searches are carried out on EU-based servers before the traffic is forwarded to Analytics servers for processing. Regional data centers are used in Google Analytics. When Google Analytics connects to the nearest available Google data center, the measurement data is sent to Analytics via an encrypted HTTPS connection. In these centers, the data is further encrypted before being forwarded to Analytics' processing servers and made available on the platform. The most suitable local data center is determined based on the IP addresses. This may also result in data being transferred to servers abroad, e.g. the USA (see, in particular, the lack of an appropriate level of data protection and the guarantees provided, Section 4.2).

We also use the technical extension “Google Signals”, which enables cross device tracking. This allows an individual website visitor to be assigned to different devices. However, this only happens if the visitor is logged into a Google service when visiting the website and at the same time has activated the “personalized advertising” option in their Google account settings.

Even then, no personal data or user profiles will be accessible to us; they remain anonymous to us. If you do not want to use “Google Signals”, you can deactivate the “personalized advertising” option in your Google account settings. Users can prevent Google from collecting the data generated by the cookie and relating to the use of the website by the user in question (including the IP address) and from processing this data by Google by using the browser available under the following link -Download and install plugin: <http://tools.google.com/dlpage/gaoptout?hl=de>.

As an alternative to the browser plug-in, users can click this link to prevent Google Analytics from recording data on the website in the future. An opt-out cookie is created

stored on the user's device. If the user deletes cookies (see section 5 Cookies), the link must be clicked again.

5.5 Social Media

5.5.1 Social Media Profiles

On our website we have included links to our profiles in the social networks of the following providers:

- Meta Platforms Inc., 1601 S California Ave, Palo Alto, CA 94304, USA, [Datenschutzhinweise](#);
- LinkedIn Unlimited Company, Wilton Place, Dublin 2, Irland, [Datenschutzhinweise](#).

If you click on the icons of the social networks, you will automatically be redirected to our profile in the respective network. A direct connection is established between your browser and the server of the respective social network. This gives the network the information that you have visited our website with your IP address and clicked on the link. This may also result in data being transferred to servers abroad, e.g. the USA (see, in particular, the lack of an adequate level of data protection and the guarantees provided, Sections 4.2 and 4.3).

If you click on a link to a network while logged into your user account with that network, the content of our website may be linked to your profile so that the network can associate your visit to our website directly with your account. If you want to prevent this, you should log out before clicking on the relevant links. A connection between your access to our website and your user account always takes place when you log in to the respective network after clicking on the link. The respective provider is responsible under data protection law for the associated data processing. Please therefore note the data protection information on the network's website.

The legal basis for any data processing attributed to us is our legitimate interest within the meaning of Article 6 Paragraph 1 Letter f of the GDPR in the use and promotion of our social media profiles.

5.5.2 Social media plugins

On our website you can use social media plugins from the providers listed below:

- Meta Platforms Inc., 1601 S California Ave, Palo Alto, CA 94304, USA, [Datenschutzhinweise](#);
- TripAdvisor LLC, 400 1st Avenue, Needham, MA 02494, USA, <https://www.tripadvisor.com>
- HolidayCheck AG Bahnweg 8 CH-8598 Bottighofen, <https://www.holidaycheck.de/datenschutz>

We use social media plugins to make it easier for you to share content from our website.

The social media plugins help us to increase the visibility of our content on social networks and therefore contribute to better marketing. The plugins are deactivated by default on our websites and therefore do not send any data to the social networks when you simply access our website. To increase data protection, we have integrated the plugins in such a way that a connection to the network servers is not automatically established. Only when you activate the plugins by clicking on them and thus give your consent to the data transfer and further processing by the social network providers will your browser establish a direct connection to the servers of the respective social network.

The content of the plugin is transmitted directly from the social network to your browser and integrated into the website. This provides the respective provider with the information that your browser has accessed the corresponding page on our website, even if you do not have an account for this social network or are not currently logged in to it. This information (including your IP address) is transmitted from your browser directly to a server of the provider (usually in the USA) and stored there (see, in particular, the lack of an adequate level of data protection and the guarantees provided, Section 4.2 and 4.3). We have no influence on the extent of the data that the provider collects with the plugin, although from a data protection perspective we can be considered jointly responsible with the providers up to a certain extent.

If you are logged in to the social network, it can assign your visit to our website directly to your user account. If you interact with the plugins, the corresponding information is also transmitted directly to the provider's server and stored there. The information (e.g. that you like a product or service from us) may also be published on the social network and may be displayed to other users of the social network. The provider of the social network may use this information for the purpose of placing advertising and designing the respective offer to meet your needs. For this purpose, usage, interest and relationship profiles could be created, e.g. to evaluate your use of our website with regard to the advertisements shown to you on the social network, to inform other users about your activities on our website and to provide further information on the use of the website to provide services related to the social network. The purpose and scope of data collection and the further processing and use of the data by the social network providers as well as your related rights and setting options to protect your privacy can be found directly in the data protection information of the respective provider.

If you do not want the social network provider to assign the data collected via our website to your user account, you must log out of the social network before activating the plugins. For the data

processing described, your consent within the meaning of Art. 6 Para. 1 lit. a GDPR forms the legal basis. You can revoke your consent at any time by declaring your revocation to the provider of the plugin in accordance with the information in their data protection information.

5.6 Online Advertising and Targeting

5.6.1 In general

We use services from various companies to provide you with interesting offers online. Your user behavior on our website and the websites of other providers is analyzed in order to then be able to show you online advertising that is individually tailored to you.

Most technologies for tracking your user behavior (tracking) and for the targeted display of advertising (targeting) work with cookies (see also section 5.2), which can be used to recognize your browser across different websites. Depending on the service provider, it is also possible for you to be recognized online even when using different devices (e.g. laptop and smartphone). This can be the case, for example, if you have registered with a service that you use on multiple devices.

In addition to the data already mentioned, which is generated when websites are accessed (log file data, see section 5.1) and when cookies are used (section 5.2) and which can be passed on to the companies involved in the advertising networks, the following data in particular is included in the selection the advertising that is potentially most relevant to you:

- Information about yourself that you provided when registering or using a service from advertising partners (e.g. your gender, your age group);

- and - User behavior (e.g. search queries, interactions with advertising, types of websites visited, products or services viewed and purchased, newsletters subscribed to).

We and our service providers use this data to determine whether you belong to the target group we are addressing and take this into account when selecting advertisements. For example, after you have visited our site, you may be shown displays of the products or services you have consulted when you visit other sites (re-targeting). Depending on the extent of the data, a user profile can also be created, which is automatically evaluated, with the ads being selected according to the information stored in the profile, such as membership in certain demographic segments or potential interests or behavior. Such advertisements can be displayed to you on various channels, which, in addition to our website or app (as part of on-site and in-app marketing), also

include advertisements that are transmitted via the online advertising networks we use, such as Google become.

The data can then be evaluated for the purpose of billing the service provider and to assess the effectiveness of advertising measures in order to better understand the needs of our users and customers and to improve future campaigns. This can also include information that the performance of an action (e.g. visiting certain sections of our websites or sending information) can be traced back to a specific advertisement. We also receive aggregated reports of ad activity and information about how users interact with our website and our ads from the service providers.

The legal basis for this data processing is your consent within the meaning of Art. 6 Para. 1 lit. a GDPR. You can revoke your consent at any time by rejecting or switching off the relevant cookies in the settings of your web browser (see section 5.2). Further options for blocking advertising can also be found in the information provided by the respective service provider, such as at [Google](#).

5.6.2 Google Ads This website uses the services of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA (Google) for online advertising, as explained in Section 5.6.1. For this purpose, Google uses cookies (see [Liste here](#)), which enable your browser to be recognized when you visit other websites. The information generated by the cookies about your visit to these websites (including your IP address) is transmitted to a Google server in the USA and stored there (see, in particular, the lack of an adequate level of data protection and the guarantees provided, section 4.2 and 4.3). You can find further information about data protection at Google here [hier](#).

The legal basis for this data processing is your consent within the meaning of Art. 6 Para. 1 lit. a GDPR. You can revoke your consent at any time by rejecting or switching off the relevant cookies in the settings of your web browser (see section 5.2). You can find more ways to block ads [hier](#).

6. Retention periods

We only store personal data for as long as is necessary to carry out the processing operations explained in this data protection declaration within the scope of our legitimate interests. In the case of contractual data, storage is required by statutory retention requirements. Requirements that oblige us to store data arise from accounting regulations and tax regulations. According to these regulations, business communications, concluded contracts and accounting documents must be retained for up to 10 years. If we no longer need this data to carry out the services for you, the data will be blocked. This means that the data may only be used if this is necessary to fulfill retention obligations or to defend and enforce our legal interests. The data will be

deleted as soon as there is no longer any obligation to retain it and no legitimate interest in retaining it.

7. Data Security

We use appropriate technical and organizational security measures to protect your personal data stored by us against loss and unlawful processing, particularly unauthorized access by third parties. We oblige our employees and the service companies we commission to maintain confidentiality and data protection. Furthermore, these individuals are only granted access to personal data to the extent necessary to fulfill their tasks. Our security measures are continually adapted in line with technological developments. However, the transmission of information via the Internet and electronic means of communication always involves certain security risks and we cannot therefore provide an absolute guarantee for the security of information transmitted in this way.

8. Your Rights

Provided the legal requirements are met, you as the person affected by data processing have the following rights:

Right to information: You have the right to request access to your personal data stored by us at any time and free of charge when we process it. This gives you the opportunity to check which personal data we process about you and whether we process it in accordance with the applicable data protection regulations.

Right to rectification: You have the right to have incorrect or incomplete personal data corrected and to be informed of the correction. In this case, we will also inform the recipients of the affected data about the adjustments we have made, unless this is impossible or involves disproportionate effort. **Right to deletion:** You have the right to have your personal data deleted under certain circumstances. In individual cases, particularly in the case of statutory retention obligations, the right to deletion may be excluded. In this case, under certain conditions, the data can be blocked instead of deletion.

Right to restriction of processing: You have the right to request that the processing of your personal data be restricted.

Right to data portability: You have the right to receive from us, free of charge, the personal data you have provided to us in a readable format.

Right to object: You can object to data processing at any time, especially in the case of data processing in connection with direct marketing (e.g. marketing emails).

Right of withdrawal: You generally have the right to withdraw your consent at any time. However, processing activities based on your consent in the past will not become unlawful as a result of your revocation. To exercise these rights, please send us an email to the following address: datenschutz@steinenschanze.ch

Right to complain: You have the right to lodge a complaint with a responsible supervisory authority, e.g. against the way your personal data is processed.
