

Data privacy policy and consent to data use

We welcome your visit to our home page and thank you for your interest in our company. Our interactions with our clients and interested parties are a matter of trust. We really value the trust extended to us, meaning that we are committed to exercising great care when handling your data and protecting it from misuse.

We take the protection and confidential treatment of your personal data seriously and therefore strive to make you feel safe and at ease during your visit to our website. For this reason, we act only in compliance with the valid legal stipulations concerning the protection of personal data and data security. The purpose of this data privacy information is therefore to provide you with information regarding the data that we store and how we use it – subject to existing German data protection regulations of course.

AZIMUT Hotels operates in accordance with the EU General Data Protection Regulation (EU GDPR). In the following, we explain what information we collect when you visit our website and how this information is used.

Overview

- I. Name and address of data controller
- II. Name and address of data protection officer
- III. General information on data processing
- IV. Provision of the website and creation of log files
- V. Contact form / e-mail contact
- VI. Online booking via the website
- VII Online booking via other websites
- VIII. Newsletter Service
- IX. Loyalty-Programm
- X. Support, advice und advertising to corporate clients
- XI. Online review
- XII. Use of Cookies
- XIII. Protection of minors
- XIV. Rights of the data subject
- XV. Right to lodge a complaint with a regulatory authority
- XVI. Security
- XVII. User declaration of consent

I. Name and address of data controller

The data controller, within the meaning of the EU GDPR and other national data protection laws of the member states as well as other data protection regulations, is::

AZIMUT Management Europe GmbH, Uhlandstr. 12, D-10623 Berlin, Deutschland

Tel: +49 (0) 30 / 40 05 63 70, Mail: info.europe@azimuthotels.com

II. Name and address of data protection officer

The data controller's data protection officer is::

Berit Schubert, DataSolution Thurmann GbR, Isarstr. 13, D-14974 Ludwigsfelde, Deutschland, Tel.: +49 (0) 3378 205729, Mail: mail@hoteldatenschutz.de

III. General information on data processing

1. Scope of processing personal data

In principle, we collect and use the personal data of our users only insofar as is necessary for the provision of a functional website and for our content and services. Collection and use of personal data takes place regularly only after consent from the relevant user. An exception is made in cases where it is not possible to obtain consent in advance for objective reasons and where processing of the data is permitted by statutory regulations.

2. Legal basis for processing personal data

Insofar as we obtain consent from the data subject for personal data processing operations, Art. 6 (1) a General Data Protection Regulation (GDPR) shall serve as the legal basis. Where the processing of personal data is required for the fulfilment of a contract to which the data subject is party, Art. 6 (1) b GDPR shall serve as the legal basis. This shall also apply to all processing operations required for the execution of pre-contractual measures. Insofar as the processing of personal data is required for the fulfilment of a legal obligation (statutory conditions) to which our company is bound (e.g. Federal Registration Act), Art 6 (1) c GDPR shall serve as the legal basis. However, if processing is necessary to safeguard a legitimate interest of our company or of a third party and the interests, basic rights and fundamental freedoms of the data subject do not outweigh the aforementioned legitimate interest, Art. 6 (1) f GDPR shall serve as the legal basis for processing.

3. Deletion of data and storage duration

Personal data of the data subject is deleted or blocked as soon as the purpose for storage no longer applies. Storage beyond this may take place if this is provided for by the European or national legislator in EU regulations, laws or other provisions to which the data controller is subject. Data shall also be blocked or deleted once the storage period prescribed by the aforementioned standards expires, unless further storage of the data is necessary for the conclusion or fulfilment of a contract.

IV. Provision of the website and creation of log files

1. Description and scope of data processing

Each time this website is accessed, our system records data and information from the computer system of the inquiring computer by means of an automated system. The following data is collected as part of this process:

- Information about the browser type and version used
- The user's operating system
- The user's IP address

- Time and date of access
- Websites from which the user's system has come to our website
- Websites accessed by the user's system via our website

This data is also stored in our system's log files. This data is not stored together with other personal data of the user. It is therefore not possible to create personal user profiles. The stored data shall only be evaluated for statistical purposes.

2. Legal basis for data processing

The legal basis for the temporary storage of data and log files is to safeguard the legitimate interests of our company according to Art. 6 Abs. 1 lit. f DSGVO.

3. Purpose of data processing

The system temporarily stores the user's IP address in order to make the website available on the user's computer. To do this, the user's IP address must be stored for the duration of the session.

The storage in log files is carried out to ensure the functional capability of the website. The data also helps us to optimise the website and ensure the security of our IT systems. No data is evaluated for marketing purposes in this context.

This is also the reasoning behind our legitimate interest in data processing.

4. Storage duration

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. When data is collected in order to make the website available, this is the case when the respective session ends.

When data is stored in log files, this is the case after seven days at the latest. Storage beyond this is possible. In this case, the IP addresses of users are deleted or scrambled so that assignment to the inquiring client (data subject) is no longer possible.

5. Option for objection and elimination

The collection of data in order to make the website available and the storage of data in log files is necessary for operating the website. Therefore, the user has no right of objection.

V. Contact form / e-mail contact

1. Description and scope of data processing

Insofar as a contact form is provided on our website, this may be used to make contact electronically. Should a user contact us via the contact form, the data entered in the input template shall be transferred to us and then stored. This data includes: title, first name and surname, address, e-mail address, telephone number as well as the reason for contact.

It is also possible to contact us using the e-mail address provided. In this case, personal data of the user which is transmitted along with the e-mail shall be stored.

No data shall be disclosed to third parties in this context. Data shall be used exclusively for the purposes of correspondence.

2. Legal basis for data processing

The legal basis for the processing of the data is in the presence of the consent of the user according to Art. 6 Abs. 1 lit. a DSGVO.

If the purpose of making contact is to conclude a contract, the initiation of a business relationship or of a contractual relationship shall constitute the additional legal basis for data processing according to Art. 6 Abs. 1 lit. b DSGVO.

3. Purpose of data processing

We only process personal data taken from the input template of the contact form for the purposes of making contact. If we are contacted by e-mail, we also have a necessary legitimate interest to process data.

Other personal data processed during the submission process serves to prevent misuse of the contact form and to guarantee the security of our IT systems.

4. Storage duration

Data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. For personal data sent by e-mail, data is deleted when the respective correspondence with the user has ended. Correspondence concludes when it can be inferred from the circumstances that the matter in question has been conclusively resolved.

If contact is made based on a pre-contractual relationship (offer or reservation request), the transmitted data shall be additionally stored in our hotel and/or event software and used for executing contracts. Should no contractual relationship arise, we shall delete the data regularly.

5. Option for objection and elimination

The inquirer (data subject) can revoke his/her consent to the processing of personal data at any time. We have set up the e-mail address **info.europe@azimuthhotels.com** for this purpose.

Please note that in the case of an objection, correspondence cannot be continued, and we cannot continue to make offers, etc.

In this case, all personal data stored at the time of making contact shall be deleted.

VI. Online booking via the website

1. Description and scope of data processing

Our website provides users with the opportunity to book rooms for every AZIMUT Hotel. Should a user contact us via the contact form, the data entered in the input template shall be transferred to us and then stored. This data includes: first name, surname, e-mail address, telephone, e-mail, mailing address and contact partner for corporate clients, as well as, where appropriate, the name and contact details of guests, travel dates, wishes/requests, payment information, date and time.

The online reservation system TravelClick, Inc. carries out online bookings made via our website. The company is located at: 7 Times Square, 38th Floor, New York, USA. All booking details provided by you shall be transferred in encrypted form. Our contracting partner has agreed to handle your transmitted data in a manner compliant with data protection, and takes all organisational and technical measures to protect your data.

No data shall be disclosed to third parties in this context. Data is used exclusively for processing bookings and for the purposes of correspondence.

2. Legal basis for data processing

The conclusion of an accommodation contract with the user shall constitute the legal basis for data processing according to Art. 6 Abs. 1 lit. b DSGVO.

The transmitted data shall be stored in our hotel software and used for executing contracts.

3. Purpose of data processing

We only process personal data taken from the input template of the contact form for the purposes of processing booking inquiries and completing payment transactions.

4. Storage duration

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of a contractual relationship, we will delete the data received as soon as national, commercial, statutory or contractual retention requirements are met.

5. Option for objection and elimination

The inquirer (data subject) can revoke his/her consent to the processing of personal data at any time. We have set up the e-mail address **info.europe@azimuthhotels.com** for this purpose.

Please note that in the case of an objection, we cannot complete the booking or continue to carry out correspondence.

VII Online booking via other websites

1. Description and scope of data processing

AZIMUT Hotels provides interested parties with the opportunity to book rooms and make arrangements via hotel reservation portals (third-party providers). If a user makes use of this opportunity, the data entered in the input template will be transmitted to us and stored to the extent permitted by the respective hotel reservation portal in accordance with its own privacy policy. Data may include the following: first name, surname, e-mail address, telephone, address, number of guests, expected time of arrival, requests/wishes, payment information (credit card).

No data shall be disclosed to third parties in this context. Data is used exclusively for processing the booking and for the purposes of correspondence, where appropriate.

2. Legal basis for data processing

The conclusion of an accommodation contract with the user shall constitute the legal basis for data processing according to Art. 6 Abs. 1 lit. b DSGVO.

The transmitted data shall be stored in our hotel software and used for executing contracts.

3. Purpose of data processing

We only process personal data taken from the input template of the contact form for the purposes of processing booking inquiries and completing payment transactions.

4. Storage duration

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of a contractual relationship, we will delete the data received as soon as national, commercial, statutory or contractual retention requirements are met.

AZIMUT Hotels has no control over how long the respective hotel reservation portal stores data.

5. Option for objection and elimination

The inquirer (data subject) can revoke his/her consent to the processing of personal data at any time. We have set up the e-mail address **info.europe@azimuthhotels.com** for this purpose.

Please note that in the case of an objection, we cannot complete the booking or continue to carry out correspondence.

VIII. Newsletter Service

1. Description and scope of data processing

There are a number of different options provided on our website for subscribing to our newsletter service. Should a user contact us via the contact form, the data entered in the input template shall be transferred to us and then stored. This data includes: e-mail address, title, first name, surname.

Should we otherwise receive an e-mail address where the recipient clearly informs us that he/she would like to receive our newsletter, we shall collect his/her data using the input template provided on our website.

No data shall be disclosed to third parties in this context. Data shall be used exclusively for the purposes of sending the newsletter.

2. Legal basis for data processing

The provision of the recipient's consent shall constitute the legal basis for data processing According to Art. 6 Abs. 1 lit. a GDPR. This is ensured through a double opt-in procedure.

3. Purpose of data processing

We process personal data exclusively for the purposes of sending the individual newsletter.

4. Storage duration

Data shall be deleted as soon as the newsletter service is unsubscribed.

5. Option for objection and elimination

The recipient can revoke his/her consent to the processing of personal data at any time. Every newsletter provides the option for a recipient to unsubscribe. We have set up the e-mail address **info.europe@azimuthhotels.com** for this purpose.

IX. Loyalty-Programm

1. Description and scope of data processing

Should a user contact us via the contact form, the data entered in the input template shall be transferred to us and then stored. This data includes e-mailaddress, salutation, first name, family name.

For the implementation of the loyalty program, we use the service provider HotelsBI. Your data will be stored in our CRM system, which is maintained by HotelsBI.

2. Legal basis for data processing

The legal basis for the processing of the data is in the presence of the consent of the user according to Art. 6 Abs. 1 lit. a DSGVO. This is ensured by registering for the program.

3. Purpose of data processing

The data is used to collect bonus points and marketing activities related to the Loyalty Program.

4. Storage duration

The data will be deleted as soon as you have terminated the account and as soon as national, commercial, statutory or contractual retention requirements are met

5. Option for objection and elimination

The recipient can revoke his/her consent to the processing of personal data at any time. Every newsletter provides the option for a recipient to unsubscribe. We have set up the e-mail address info.europe@azimuthotels.com for this purpose.

X. Support, advice und advertising to corporate clients

1. Description and scope of data processing

In order to provide support, advice and advertising to corporate clients, in addition to information about the business partner or potential business partner, we also collect and use information about the contact person, telephone number and postal address. The information is taken from a variety of sources, either by requesting it (e-mail or by phone) or at events, fairs, from business cards received by our sales staff, etc.

No data shall be disclosed to third parties in this context. Data is used exclusively for the aforementioned purposes.

2. Legal basis for data processing

Our legitimate interest in data processing shall otherwise constitute the legal basis for data processing according to Art. 6 Abs. 1 lit. f DSGVO. If the purpose of making contact is to conclude a contract, the initiation of a business relationship or of a contractual relationship shall constitute the additional legal basis for data processing.

In order to improve our services, we manage all data received in the CRM module of our central hotel software within the AZIMUT Hotels

To increase our services we manage all data received in the CRM system of the company HotelsBI. The respective booking data are transmitted from the hotel software to the CRM system and can only be viewed by the responsible office and by central functionalities. Used together is access to the master data of a guest, e.g. make a reservation for another hotel at a later time, rebook or perform marketing activities centralized. Central services such as reservation and marketing access this data. The legal basis for processing the data is our legitimate interest in the processing of data in accordance with Art. 6 para. 1 lit. f DSGVO in the context of central administration and use of the data of our customers and business partners within the hotel group.

3. Purpose of data processing

We use this contact information exclusively for our own purposes and for the needs-based design of our own sales activities.

4. Storage duration

Basically, no retention period is provided. However, should our sales department have had no contact with the company within three years, the sales department decides whether the contact person of the company contact is to be deleted.

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

5. Option for objection and elimination

The contact person of the company can revoke his/her consent to the processing of personal data at any time. We have set up the e-mail address **info.europe@azimuthhotels.com** for this purpose.

All personal data of the contact person saved to the business partner will be deleted in this case.

XI. Online review

1. Description and scope of data processing

Furthermore, we have integrated the hotel rating software from tripadvisor on our hotel websites. Past guests may review the hotel after checking out. In this connection, we would like to send you an e-mail within 14 days of departure to ask you to submit a hotel review. We use the service provider Revinate Inc. to send the evaluation e-mail. Reviews can be published anonymously upon request. If you did not enjoy your stay at our hotel, we would like the opportunity to contact you.

No data shall be disclosed to third parties in this context. Data shall be used exclusively for the purposes of publishing the review and to reconcile poor reviews.

2. Legal basis for data processing

Our legitimate interest in data processing shall otherwise constitute the legal basis for data processing according to Art. 6 Abs. 1 lit. f DSGVO.

3. Purpose of data processing

The hotel review is intended to communicate and summarise hotel guest opinions on our website so that interested parties can gain an impression of our services. The results are also used for our internal quality management.

4. Storage duration

Data shall not be deleted.

5. Option for objection and elimination

It is possible to have the published review deleted at any time (right to be forgotten). We have set up the e-mail address **info.europe@azimuthhotels.com** for this purpose. Simply let us know to which review your request relates.

XII. Use of Cookies

1. Description and scope of data processing

Cookies are small files that enable us to store specific user-related information on your computer when visiting our website. Cookies help us to determine the number of users who have used our website and the usage frequency, and they allow us to organise our products and services in the most convenient and effective way possible for you.

We use 'session cookies', which are stored temporarily on your computer for the period in which you use our website. Session cookies are stored on your data carrier and are used to ensure specific settings and functionalities on our website through your browser. The cookies we use will be deleted at the end of the browser session, i.e. when you close your browser.

We also use cookies on our website that allow for the analysis of user browsing habits. In this way, the following data can be transmitted: entered search terms, frequency of page views, use of website functions. Technical measures are employed to pseudonymise user data which is collected in this manner. As a result, it is not possible to assign data to an inquirer (data subject). The data will not be stored together with other user personal data. When visiting our website, the user is informed about the use of cookies for the purposes of analysis. His/her consent to the processing of personal data is also obtained in this context. The user is also referred to the data privacy policy at this point.

2. Legal basis for data processing

Our legitimate interest in data processing shall constitute the legal basis for the processing of personal data using cookies that are technically necessary according to Art. 6 Abs. 1 lit. f DSGVO.

The provision of the user's consent for this specific purpose shall constitute the legal basis for the processing of personal data using analysis-based cookies. According to Art. 6 Abs. 1 lit. a DSGVO.

3. Purpose of data processing

Cookies which are technically necessary are used to simplify website use for users. Some of our website's functions cannot be offered without the use of cookies. These services require the browser to be recognised again following a page change. The user data collected by technically necessary cookies will not be used to create user profiles.

Analysis cookies are used to improve the quality of our website and its content. Such cookies enable us to learn how the website is used so that we can continually improve our offer.

4. Storage duration, option for objection and elimination

Cookies are stored on the user's computer, which will transmit them to our website. This will grant you as the user complete control over the usage of cookies. You can deactivate or restrict the transmission of cookies by changing your Internet browser's settings. Previously stored cookies can be deleted at any time. Cookies can also be deleted automatically. In the event that cookies are deactivated for our website, certain features of our website may no longer be available.

It is also possible to use our offers without any cookies or scripts. You may deactivate the storage of cookies and scripts in your browser, you may restrict cookies and script on certain websites, or you may set up your browser in such a way that you are notified whenever a cookie is activated. You can delete cookies from your computer's hard drive at any time.

If you are concerned about third-party cookies, you can disable just these cookies and still enable the cookies which allow our website to function properly.

Here are some instructions on how to disable cookies:

Mozilla Firefox: <http://support.mozilla.org/en-US/kb/enable-and-disable-cookies-Webseite-preferences>

Google Chrome:

https://support.google.com/chrome/bin/answer.py?hl=de&answer=95647&p=cpn_cookies

Internet Explorer: <http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>

Safari: <http://support.apple.com/kb/PH11913>

Please note, however, that these changes may affect the way in which the website is displayed or limit its functionality.

5. Supplementary information

In addition to the information provided above regarding the use of cookies, we would like to draw your attention to the following:

Use of Google Analytics, Google DoubleClick Cookies, Google Convers Tracking and Google Remarketing

Our website may use Google Analytics, **Google DoubleClick Cookies**, Google Convers Tracking and Google Remarketing. These services are provided by Google Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043, USA ('Google').

This website uses Google Analytics, a web analysis service provided by Google Inc. ('Google'). Google Analytics uses so-called 'cookies'. These are text files stored on the user's computer which facilitate an analysis of website usage. The information generated by the cookie about the use of this website by the user is generally sent to a Google server in the USA and stored there. In the event that IP anonymisation is activated on this website however, your IP address will first be truncated by Google within the member states of the European Union or in other states that are parties to the Agreement on the European Economic Area. The full IP address will only be sent to a Google server in the USA and truncated there in exceptional cases. IP anonymisation is active on this website. On behalf of the operator of this website, Google will use this information to evaluate the use of the website, to compile reports on website activities and to provide the website operator with other services related to website activity and Internet usage. The IP address provided by your browser as part of Google Analytics will not be merged with other Google data. You can prevent the storage of cookies by changing the respective settings in your browser software; however, please note that you may not be able to use all features of this website in full. You may also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>. As an alternative to using the browser add-on or within browsers on mobile devices, please click this link to prevent future detection by Google Analytics within this website. This will store an opt-out cookie on your device. If you delete your cookies, you must click this link again. The explanations provided above in Section XI No. 1 to 4 shall apply accordingly.

Deactivation of Google advertising

(http://www.google.com/privacy_ads.html) or on the opt-out page of the Network Advertising Initiative (http://www.networkadvertising.org/managing/opt_out.asp)

Use of Google Maps

This website uses Google Maps API for the purpose of visually displaying geographical information. Google Maps is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

To use the functions of Google Maps storage of your IP address is required. This information will usually be transferred to, and stored on, a server in the USA. Google may transfer this information to third parties provided this is required by law or such third parties process these data on behalf of Google. Google will not link your IP address with other Google data under any circumstances. Nevertheless, it is technically possible that Google may identify at least some users on the basis of the data received. In addition, it would be technically possible for Google to process personal data and personal profiles of website users for other purposes over which we do not have, and cannot have, any control. This, and the fact that data are being transmitted to the USA, is problematic from a data protection perspective.

2. Legal basis for processing personal data

The using of Google Maps with the user shall constitute the legal basis for data processing.

3. Purpose of data processing

The purpose of using Google Maps is to allow the user to see our location on the website and to give them the ability to identify different directions through the services of Google Maps.

4. Storage duration, option for objection and elimination

You have the option of deactivating the Google Map service and thereby prevent the transfer of data to Google: Simply deactivate JavaScript in your browser. However, we would like to point out that, in this case, you will be unable to use the map display.

XIII. Protection of minors

This service is directedly mainly at adults. We do not currently market any services specifically aimed at children. As a result, we do not knowingly collect age rating information, nor do we knowingly collect personal information from children under the age of 16. We do, however, advise all visitors to our website who are under the age of 16 to avoid disclosing or providing any personal information to our service. In the event that we discover that a child under the age of 16 has provided personal information to us, we shall delete the child's personal information from our files, insofar as this is technically possible.

XIV. Rights of the data subject

When your personal data is processed, you become the data subject within the meaning of the GDPR and you shall have the following rights in relation to us ('the data controller'):

You have a right to information about the personal data stored about you, including the purpose of processing, as well as about any transfer of data to third parties and the duration of data storage.

Should the data be incorrect or no longer required for the original purpose for which it was collected, you can request that the data be corrected, deleted or the processing of data restricted. Insofar as provided for in the processing procedures, you can also view and correct your data yourself as necessary. You shall have the right to object at any time, on compelling legitimate grounds relating to your particular situation, to the processing of your personal data, insofar as the processing is based on a legitimate interest. Following an objection, the data controller shall no longer process the personal data relating to you unless the data controller can prove compelling reasons for processing which warrant protection and which outweigh your interests, rights and freedoms, or can prove that the processing serves the purpose of asserting, exercising or defending legal claims. If the personal data relating to you is processed for the purpose of direct advertising, you have the right to object at any time to the processing of the personal data relating to you for the purpose of such advertising; this also applies to profiling insofar as it is directly connected with such direct advertising. If you object to processing for the purposes of direct advertising or profiling, the personal data relating to you shall no longer be used for these purposes.

You have the right to revoke your declaration of consent under data protection law at any time. Revocation of consent does not affect the legality of processing carried out on the basis of consent up to the time of revocation.

Should you have any questions relating to your rights and how to exercise your rights, please contact the [Responsible Body](#) or the [Data Protection Officer](#).

XV. Right to lodge a complaint with a regulatory authority

Without prejudice to any other administrative or judicial remedy, you (the data subject) have the right to lodge a complaint with a regulatory authority for data protection, in particular in the member state of your habitual residence, place of work or the place of the alleged infringement if you believe that the processing of personal data relating to you infringes data protection.

The regulatory authority with which the complaint has been lodged shall inform the complainant about the progress and the outcome of the complaint including the possibility of judicial remedy.

XVI. Security

In line with Article 32 GDPR, AZIMUT Hotels uses technical and organisational security measures to protect the data which we manage against accidental or deliberate manipulation, loss, destruction or access by unauthorised persons. Our security measures are subject to constant improvement to match the pace of technological developments. Access to this data is permitted only to a few authorised individuals and those persons concerned with the relevant technical, commercial and editorial support of these servers.

XVII. User declaration of consent

By using our websites and the offers contained therein, you agree that we can store the personal data you have voluntarily submitted to us and process and use this data in compliance with the data privacy policy.

We reserve the right to change, update or supplement these data protection guidelines at any time. Any revised data protection guidelines shall apply only to personal data that has been collected or changed since the revised guideline entered into force.

Last revised | May 2018