

DATA PROTECTION POLICY "Online services"

VIENNA INTERNATIONAL HOTELMANAGEMENT AG

1)	Processing activity	Maintaining the online availability of information concerning the controller's company for interested parties and customers¹	
2)	Controller	Vienna International Hotelmanagement AG ("VIENNA HOUSE") Business address: Dresdner Straße 87, 1200 Vienna, Austria Telephone: +43 1 333 73 73-0 Email: office@viennahouse.com	
3)	Purposes of data processing • On the legal basis of fulfilling or preparing the agreement	a)	Maintaining the availability of information and advertisement concerning the controller's company
b)		Provision of communication- and booking channels to disseminate content, service customer relationships, execute bookings and vouchers	
c)		Maintaining and increasing customer satisfaction and customer retention by analysing usage behaviour with the goal of improving the service offering	
d)		Gathering of user numbers for the purposes of documenting the website's reach	
4)	Legal basis of data processing	1) Online usage: contractual fulfilment. Use of the online media and controller is based on an agreement within the meaning of Art. 6 Para. 1 lit b GDPR ² ; a registration relationship arises from registration. The controller hereby discloses that they make use of third-party content (such as links, Pixel, plug-ins) when performing their contractual services. Due to technical circumstances when accessing content/the Internet, electronic identification data, particularly IP address and user's browser settings, are automatically sent to third parties when loading online pages, who further process the data under their own responsibility. The primary contractual relationship arises with the	

¹ Any references to natural persons within this data protection policy which are only provided in the male form relate equally to both women and men. The gender-specific form is to be used when referring to specific natural persons. Customers refers to both consumers and entrepreneurs.

² Kühling/Buchner GDPR 2017, Art. 6 Point 59

		<p>respective service provider when using the controller's social media channels.</p> <p>2) Additional services: consent. The controller explicitly solicits the customer's consent for individual services on the online platform (e.g. electronic newsletter). This consent can be revoked at any time with future effect.</p> <p>3) Overriding legitimate interests (see Point 6.)</p>
5)	Change in purpose	The controller does <u>not</u> undertake any change in purpose when processing personal data.
6)	Description of the (overriding) <u>legitimate interests</u> for the purposes of IT security:	The controller saves the IP addresses of users for a period of 7 days in order to defend against targeted attacks in the form of overloading servers (denial of service attacks) and other damage to systems. The controller has a legitimate interest in this form of data processing for the purposes of maintaining the functionality of its services provided online (Recital 49 of GDPR).
7)	Analyses of personal aspects of the customer	Analysis of personal aspects of the customer does <u>not</u> take place.
8)	Obligation to provide data	Customers are under <u>no</u> obligation to provide data.
9)	Automated decision-making	The customer is not subject to <u>any</u> automated decision that has a legal effect upon them.
10)	Types of data processed	Gathered by the controller
		IP addresses (log files)
		End device data
		Browser used
		Device used
		Communication log
		Information on account usage (e.g. date created, number of logins, data of last query)

			Information on newsletter subscription
			User ID
			Facebook user ID
			Facebook email address
			Facebook profile link
			Date of last Facebook matching
			Location
11)	Data sources (If not disclosed by customer or gathered by controller)	Source	Types of data
		E.g. login via Facebook	
		Social media channels (For detailed information, see Point 12)	
12)	External recipients of data	Categories of external commercial service providers (commissioned data processors):	Type of data
		IT service providers	
		Bank payment service providers	Payment information
		Telecommunication companies	Shipping addresses
		IT service providers for processing voucher-based booking	Booking details
		Google Analytics , services of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google")	Anonymised IP address, name of website, browser-specific information, information on website use

		<p>"Social plug-ins":</p> <p>Facebook Inc., 1 Hacker Way, 94025 Menlo Park, USA;</p> <p>Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA;</p> <p>Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA</p> <p>Youtube LLC, principal place of business in 901 Cherry Avenue, San Bruno, CA 94066, USA - represented by Google Inc. headquartered in 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.</p> <p>LinkedIn Ireland UC.; Wilton Place, Dublin 2, Ireland</p>	IP address, URLs, cookies and data on browser settings	
13)	Transfer to third states	The following data is transferred to third states outside the EU as part of data processing:		
		Country	Application	Types of data
		USA (EU-US- Privacy Shield)	Google	<u>Google Analytics: anonymised</u> IP address, name of website, browser-specific information, information on website use
		USA (EU-US Privacy Shield)	Facebook, Instagram, Twitter, YouTube, LinkedIn	<u>Social plug-ins (after consent by double click):</u> IP address, name of website, browser-specific information, information on website use

14)	Retention period	<u>Non-registered customers</u> : The personal data (particularly IP address) of (non-registered) website visitors are stored for 7 days for the purposes of IT security.	
		<u>Registered customers (newsletter subscribers)</u> : Data from registered customers is processed by the controller upon the legal bases mentioned above for the duration of the contractual relationship. The data can be modified and deleted by the controller at any time. However, the usage agreement ends upon cancellation of the newsletter subscription, which leads to immediate deletion. More detailed information can be found on the www.viennahouse.com website under " Data protection policy newsletter customer ".	
15)	Data subject rights	Basis	Substance
		Art. 15 GDPR "Right of access"	The customer has the right to obtain confirmation as to whether their personal data is being processed.
		Art. 16 GDPR "Rectification"	The customer has the right to have inaccurate or incomplete personal data rectified.
		Art. 17 GDPR "Erasure"	The customer has the right to demand the erasure of personal data without undue delay where one of the grounds stated under Art. 17 Para. 1 GDPR applies.
		Art. 18 GDPR "Restriction"	The customer has the right to demand that the processing of personal data is restricted where one of the grounds stated under Art. 18 Para. 1 GDPR applies.
		Art. 21 GDPR "Object"	The customer has the right to lodge an objection at any time to the processing of their personal data on the basis of an overriding legitimate interest.
		Art. 20 GDPR	The customer has the right to receive their personal data in a structured,

		"Data portability"	commonly used and machine-readable format.
16)	Right to lodge a complaint	Art. 77 GDPR	Every customer has the right to lodge a complaint with a supervisory authority if they consider that the processing of personal data relating to them infringes this regulation.
17)	Supervisory authority	<p><u>Austria</u></p> <p>Austrian Data Protection Authority Wickenburggasse 81080 Vienna, Austria Tel.: +43 1 52 152-0 E-Mail: dsb@dsb.gv.at Website: www.dsb.gv.at</p> <p><u>Czech Republic</u></p> <p>The Office for Personal Data Protection Urad pro ochranu osobnich udaju Pplk. Sochora 27 170 00 Prague 7 Tel.: +420 234 665 111 Fax: +420 234 665 444 E-Mail: posta@uouu.cz Website: www.uouu.cz</p> <p><u>France</u></p> <p>Commission Nationale de l'Informatique et des Libertés - CNIL 3 Place de Fontenoy - TSA 80715 – 75334 F-75002 Paris, Cedex 02 Tel.: +33 1 53 73 22 22 Fax: +33 1 53 73 22 00 Website: www.cnil.fr</p> <p><u>Germany</u></p> <p>Bundesbeauftragte für den Datenschutz und die Informationsfreiheit Husarenstraße 30 53117 Bonn Tel.: +49 228 997799 0; +49 228 81995 0 Fax: +49 228 997799 550; +49 228 81995 550</p>	

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The competence for complaints is split among different data protection supervisory authorities in Germany. Competent authorities can be identified according to the list provided [here](#).

Poland

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Romania

The National Supervisory Authority for Personal Data Processing

Opre B-dul Magheru 28-30 Sector 1

BUCUREȘTI

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Slovakia

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