

Privacy Policy – Innsbruck Information und Reservierung GmbH

Purposes of data collection:

In this Privacy Policy, we provide you with information on how we collect, use, transfer and process your personal data. As an individual customer or another individual, we offer you our services (stays, accommodation, conferences and events, as well as connected products and services) via our websites, email communication or other online or offline channels or provide you with these services.

We protect the privacy of the users of our websites to the best possible extent and handle all personal data in accordance with the provisions of European and Austrian data protection law. Personal data that you provide within the scope of enquiries concerning data protection will only be used for the purpose of processing your query.

The responsible processor of your data:

The controller as defined by the applicable provisions of data protection law is the company **Innsbruck Information und Reservierung GmbH, Burggraben 3, 6020 Innsbruck, Austria.**

On the basis of our obligation to perform the contract concluded with you, we process the following categories of data:

Customer master data – When you contact us, register with us or use services provided by us, we collect your general personal data in order to be able to contact you in line with your wishes about our services and during a stay or another service. Such personal data may include your name, email address, telephone number(s) and postal address.

Guest and travel information – When you book a stay or another service via our company, we record the details of your stay or other service (e.g. place and time of departure and arrival, airline, hotel) and other data required to complete your bookings from you directly or, if you have not booked your accommodation yourself, indirectly (via a third party) for example from friends, relatives or other organisers. We may also collect special categories of data to provide accessibility, food that meets special requests or other requested services. We may additionally require the passport details of travellers. If we book accommodation for people accompanying you, we may also collect the same categories of data from these individuals. Please therefore pass on this information to anyone whose data you provide when booking a room. Your customer data will be stored in your travel/guest profile, where we record all of the information required for your accommodation booking and the provision of our services.

How long will your data be processed? We will store your data for the amount of time and to the extent required according to the contractual basis. After the expiry of the contract, your data will be stored (in Austria) for seven years pursuant to the accounting requirements stipulated for our company. Your data will also be stored on the basis of our legitimate interest until we receive your justified objection to this storage or on the basis of your explicit consent until you withdraw this consent. For what purposes is your data processed?

Provision of our services – We use your data for your travel bookings, overnight stays, organising conferences and events, producing travel itineraries and invoices and sending you information concerning your trip or our products and services:

Payment processing – We use your master data and payment information to carry out transactions and for connected customer service activities.

Operating websites, running mobile applications and electronic communication – We use device data to secure our online services and to optimise the provision and content of our services, for updates, for non-personal trend and usage analyses in connection with our services and to determine the effectiveness of our advertisements and offers.

Optimising services and marketing activities We use your data to serve both your and our legitimate interest in optimising our services provided to you and our future services, including:

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- Automatically filling out forms and payment details
- Using contact details to
 - ✓ inform you about changes to our services
 - ✓ contact you in case of emergency
 - ✓ gather feedback on services provided
 - ✓ send you information on our products and services via post, fax or email If you are not interested in these services, you can inform us by sending us a notice of objection.

How and to whom do we pass on your data?

We generally do not pass on your data to third parties either for free or in return for payment without your consent. The exception to this rule concerns data that we are required to pass on due to a statutory or contractual objection or that we disclose on the basis of our mutual interests as specified above:

Travel agents, tour operators and other travel service providers – To successfully process your travel booking and provide your requested travel services to you and any third parties, we pass on your data to travel service providers such as hotels and ticket sales systems and their service partners.

Service partners – We pass on your data to service providers to the extent necessary for the provision of your requested services, for example to other travel agencies, conference and event planners, mobile applications, software developers, partners, IT support teams, communication systems and debt collection services.

Associated companies – We pass on your data within our corporate group to the extent permitted by law in order to provide, analyse and optimise our products and services and those of our associated companies.

Authorities, banks and courts of law – We may pass on your data to supervisory authorities, courts of law, banks and governmental authorities if we believe that we are required or permitted to do so due to laws or regulations or within the scope of legal proceedings or in order to protect either your and our interests, rights and property or those of other parties.

Transfer of business – If we negotiate or complete a transaction that fully or partially concerns our business activities (for example restructuring, mergers, sale or acquisition), data may be passed on to third parties involved in this transaction to the extent permitted by law.

Google Analytics

We have integrated Google Analytics components (with the anonymisation function) into our web pages. Google Analytics is a web analysis service. The operating company behind the Google Analytics components is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA.

The purpose of the Google Analytics components is to analyse the flow of visitors to our website. Google uses the data and information recorded to, for example, evaluate the use of our website in order to provide us with online reports showing activities on our web pages and to provide further services connected to the use of our website.

Google Analytics installs a cookie on your information technology system. The installation of this cookie allows Google to analyse the use of our website. Each time you access one of the individual pages of the websites operated by our company and containing an integrated Google Analytics component, the respective Google Analytics component automatically prompts the internet browser on your information technology system to transfer data to Google for the purpose of online analysis. Within the scope of this technical procedure, Google receives information on personal data such as your IP address, which, among other things, enables it to trace the origin of visitors and clicks and consequently calculate commission fees.

The cookie is used to store personal information such as the access time, the location from which the site was accessed and the frequency of visitors to our website. Each time you visit our web pages, this personal data, including the IP address of the

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internet connection used by you, is transferred to Google in the United States of America. Google then stores this personal data in the United States of America. Google may pass on this personal data recorded using technical methods to third parties.

You can use a corresponding setting on the internet browser used to prevent the installation of cookies by our web pages at any time and use this setting to permanently object to the installation of cookies. Activating this setting on the internet browser used would also prevent Google from installing a cookie on your information technology system. You can also erase a cookie that has already been installed by Google Analytics via your internet browser or other software programs.

Furthermore, you can additionally choose to object to and prevent both the recording of the data produced by Google Analytics with regard to the use of this website and the processing of this data. You can do so by downloading and installing a browser add-on at <https://tools.google.com/dlpage/gaoptout?hl=en>. This browser add-on informs Google Analytics via JavaScript that it is not permitted to transfer data and information on visits to web pages to Google Analytics. Google accepts the installation of the browser add-on as an objection. If you delete, format or reinstall your information technology system at a later point in time, you must also reinstall the browser add-on in order to deactivate Google Analytics.

More information and Google's Privacy Policy can be found at <https://policies.google.com/privacy?hl=en&gl=de> and <https://marketingplatform.google.com/about/analytics/terms/gb/>. Google Analytics is explained in more detail at https://marketingplatform.google.com/intl/en_uk/about/analytics/.

Please also refer to the Privacy Policy of the Innsbruck Tourist Board (TVB Innsbruck) at <https://www.innsbruck.info/en/datenschutz.html>.

What rights do you have?

You have the right to

- obtain confirmation as to whether your personal data is being processed and consequently the right to access information on the personal data of yours that has been stored at no cost and to obtain a copy of this information, as well as the right to withdraw your consent to the processing of personal data with no impact on the legality of the processing carried out on the basis of your consent until you withdraw this consent.
- obtain the rectification of inaccurate personal data.
- if need be, obtain the erasure of your data without undue delay insofar as we have no legal ground for the storage of the data concerned.
- obtain the restriction of processing.
- receive the personal data that you have provided to us about yourself in a structured, commonly used and machine-readable format.
- transmit this data to another controller (without being hindered by us).
- have your data transmitted to another controller directly by us, insofar as this is technically feasible and does not adversely affect the rights and freedoms of other individuals.
- if need be, lodge a complaint with the Austrian Data Protection Authority in the case of unlawful activity.

How do we protect your data?

We take appropriate administrative, technical and physical security measures to protect your data against unauthorised access and use. We only store your data for as long as is required to provide our services and for legitimate business purposes unless we are required to store your data for a longer period due to laws or regulations or as a result of legal disputes and official investigations.

General data security measures

We undertake to adopt suitable technical and organisation measures (e.g. anonymisation) that are designed to implement data protection effectively and to incorporate the necessary safeguards into our processing activities to meet the requirements of

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data protection law and protect your data both when specifying the means of the processing and when actually processing your personal data. To achieve this, we take suitable measures to ensure that by default, only your personal data that needs to be processed for each specific processing purpose is generally processed, and to therefore above all ensure that your data is, by default, not made available to an undefined number of natural persons without your involvement.

These measures cover aspects such as the anonymisation and encryption of your data and the ability to ensure the ongoing confidentiality, integrity, availability and resilience of the systems and services involved in the processing; the ability to restore the availability of and access to personal data in a timely manner in the event of a physical or technical incident; and regularly testing, assessing and evaluating the effectiveness of the technical and organisational measures for ensuring the security of the processing.

Amendments

We may amend this Privacy Policy from time to time due to business changes or statutory reforms. In the case of significant amendments to this Privacy Policy, we will publish a corresponding notice on our website before they come into force and inform you separately if required to do so under applicable law.

If you have any questions or complaints concerning the processing of your data, please contact our service staff or write to us at:

Innsbruck Information und Reservierung GmbH, Burggraben 3, 6020 Innsbruck, Austria; info@innsbruck.info