

# Privacy policy Traveltainment GmbH

Summary of the processing of personal data	
<b>Controller</b>	Traveltainment GmbH
<b>Purposes, for which the personal data are processed</b>	<p>Trusted Reviews help travelers to inform about the holiday destination and make the right booking decisions.</p> <p>What is special about Trusted Reviews: these reviews are only from guests who veritably travelled. Only travelers who stayed at a certain hotel are able to rate this hotel afterwards.</p> <p>We process your personal data to allow the service mentioned above by providing this website.</p>
<b>Legal basis for the processing</b>	<p>We will only process your personal data if we are entitled to by the EU General Data Protection Regulation (GDPR). The legal bases are contained in Article 6 of the GDPR. We may process your personal data for example, when</p> <ul style="list-style-type: none"><li>• it is necessary for the performance of a contract, or in order to take steps prior to entering into a contract, or</li><li>• we have a legitimate interest in the processing.</li></ul> <p>In the following privacy statement we explain in detail why we process your personal data and on which legal base.</p>
<b>Recipients of the personal data</b>	Amadeus and the respective travel agent through which you have booked the travel.
<b>Rights of data subjects</b>	You are entitled to information about the personal data relating to you as well as to rectification or erasure or to limitation of the processing and a right of objection against the processing as well as the right to data portability. The right also exists to lodge a complaint at a supervisory authority.

As of: 5.2018

Version 1.0

## Purpose of the Privacy Policy

We, the Traveltainment GmbH, take the protection of your personal data very seriously and we strictly adhere to the rules of the data protection laws.

On this website personal data is collected only to the extent that is technically necessary.

In no case the collected data is sold or transmitted to third parties for non-commercial purposes.

## Name and address of the controller

The Controller within the meaning of the EU General Data Protection Regulation ("GDPR") and other national data protection laws of the member states as well as other provisions under data protection law is:

Traveltainment GmbH  
Carlo-Schmid-Straße 12  
D-52146 Würselen/Aachen  
T: +49 (0)2405 4484 0  
F: +49 (0)2405 4484 90  
E-mail: [post@traveltainment.de](mailto:post@traveltainment.de)

You can find further details in the [masthead](#).

Should you have any questions relating to this Privacy Policy please contact us by e-mail under the following address: [dsb@traveltainment.de](mailto:dsb@traveltainment.de)

## Contact data of the data protection officer

The data protection officer of Traveltainment can be reached by normal mail under Data protection officer, Traveltainment GmbH, Carlo-Schmid-Straße 12, D-52146 Würselen/Aachen, Germany or by e-mail to [dsb@traveltainment.de](mailto:dsb@traveltainment.de).

## An initial overview

We would like to initially give you a general overview of the contents of our privacy policy.

It is very important to us that you get all required information about data protection in an easily comprehensible and transparent way. In different parts of this privacy policy you have the opportunity to view in-depth further information by means of clicking on a link or to directly read individual parts of this policy.

As you are probably aware, a modern website that equally reflects the requirements of the user and the website operator only works when certain personal data are processed. We initially explain what personal data are. You then learn what kind of personal data we collect and how we process them. Finally, we explain in detail how the processing of personal data is determined by your use of the website.

## What are personal data?

**Personal data** is any information, which refers to an identified or identifiable natural person. This is therefore all data, which identifies you as an individual or makes you identifiable. For example name, postal address, telephone number, e-mail address.

The processing of personal data is only carried out if this is permitted by statutory regulations.

We will present to you in detail below, which personal data we collect, how and why we process these and on which legal basis this takes place.

## Which personal data do we process?

First priority is that we only process personal data if this is permitted by statutory regulations. We follow the principle of processing as few personal data as possible, but as many as required for the services we offer. In the end, you as a customer benefit from this, as we are able to even better adapt our offers and services to your needs.

On this website, we process the following personal data in the context of the Trusted Reviews:

- Name (first name and surname)
- E-mail address
- Gender (as far as you specify this in the self-disclosure)
- Age groups (as far as you specify this in the self-disclosure)

## How we use the personal data entered by you

We use the entered personal data for the following purposes:

- Realization of the Trusted Reviews questionnaire

## The legal framework for the use of your personal data

The use of the entered personal data is only carried out as envisaged in the EU General Data Protection Regulation (**GDPR**):

- If necessary for the processing of personal data, we will obtain your consent pursuant to **Art. 6 Para. 1 lit. a.**
- If the processing of your personal data serves to fulfil a contract, in which you participate as a contractual party, **Art. 6 Para. 1 lit. b** GDPR is the legal basis. This shall also apply to processing activities, which are necessary for the execution of pre-contractual measures.
- If we process your personal data in order to fulfil a legal obligation, this is based on **Art. 6 Para. 1 lit. c** GDPR.
- If vital interests of the data subject or another natural person renders a processing of personal data necessary this shall take place owing to **Art. 6 Para. 1 lit. d** GDPR.
- If the processing is necessary in order to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and fundamental freedom of the data subject do not

outweigh the first mentioned interest then **Art. 6 Para. 1 lit. f** GDPR will serve as a legal basis for the processing.

If you follow this link

<http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&rid=1>

you can read the entire text of the GDPR law.

After this general overview we would like to fully inform you about which of your personal data we process and how. The type and the scope of the personal data, which we process are decisively determined according to how you use our website. Moreover, it is also decisive which information you state when using the website. We and other service providers process the information you state at different times when using the website to different degrees, depending on the type of use of this website.

## Cookies

We do not use cookies on this website.

## What happens when you merely pay a visit to our website in order to inform yourself about us?

With the mere informational use of our website, i.e. if you do not register or otherwise send information, we will only collect the personal data, which your browser transmits to our server. If you wish to view our website, we will collect the following data, which are necessary for us from a technical point of view in order to display our website to you and to guarantee the stability and security, the legal basis is Art 6 Para. 1 S. 1 lit. f GDPR:

### Technical data:

These include

- Your IP address,
- Your registration data,
- Type and version of your browser,
- Your time zone setting,
- Type and version of your browser plugins,
- Your operating system and your platform.

### Non-personal data:

Collected information relating to your use of the website, your full URL-click stream (Uniform Resource Locator), via the and from the website (with details of data and time), the products displayed or searched for by you, answer times of the sites, download errors, duration of the display of certain sites,

information relating to the site interactions (e.g. scrolling, clicking and mouse-over) as well as the methods used to leave the site.

We automatically process information which your browser transmits to us in your Server Log Files. This includes:

- Browser type/version
- Used operating system
- Referrer URL (previously visited page)
- Host name of the accessing computer (IP address)
- Time of the server request.
- The corresponding smartphone model in case of mobile access

We cannot assign these data to certain persons. These data are not merged with other data sources, moreover, the data are deleted after a statistical evaluation.

## What happens to your personal data when you have left our website after a mere informational visit?

If you have sufficiently informed yourself about us on our website and left it again without, for example, having registered for our newsletter or carrying out any further action, we will automatically delete your data, which are necessary for the operation of our homepage, within 5 days after the respective session was ended (i.e. after you closed the browser window).

The aforementioned shall apply to the visit to our website purely for informational purposes. Our website, however, offers many different possibilities for usage and contact. Depending on which offers you use, your personal data will be stored and processed to a varying extent. Below we have presented for you in detail what the respective type of usage means for the handling of your personal data.

## Questionnaire – Trusted Reviews

We cooperate with different travel mediators. We offer them our service Trusted Reviews. Trusted Reviews offers the travel mediators' customers the opportunity to comprehensively evaluate a trip. The evaluation takes place by means of filling in a questionnaire. If you receive an e-mail from us or from one of the travel mediators that cooperate with us within the framework of the Trusted Reviews program, you have the opportunity to complete a questionnaire on this website particularly set up for this purpose. The questionnaire gives you the possibility to comprehensively evaluate your holiday experience. **Participation is voluntary.**

If you decide to fill in the questionnaire, we process the following technical data:

- Your IP address
- Type and version of your browser
- Operating system
- Time of the access
- In case of mobile access the respective smartphone model

To carry out the Trusted Reviews we process the following personal data:

- Name (first and surname)
- E-mail address
- Booking number of the respective trip

At the end of the questionnaire we ask you to indicate a name. This name is published under your review. We recommend that you use a pseudonym. In addition to the indication of a name we also query the following abstract information:

- Name of the tour operator
- Age (but not the exact age, only different age groups)
- Gender
- How you traveled (e.g. as couple or single)
- If children traveled with you
- The travel period and duration of the trip

Moreover, it is possible to enter a free text for individual reviews. It should not contain any personal information about third persons. Such information can violate a right of personality.

To round off your review you have the opportunity to upload photos. We ask you not to upload photos on which persons are clearly identifiable. You should only upload photos which you took yourself and for which you own the copyright.

The review of the trip you submitted and the abstract information indicated in the final information mask are transmitted to the respective travel mediator of the reviewed trip (the "**travel mediator**"). We do not transmit any information beyond that, in particular no personal data available to us for executing the Trusted Reviews.

The travel mediator has the opportunity to publish the reviews and the photos you uploaded on his website.

The objective of the questionnaire is not to draw conclusions to you personally and your travel habits. The reviews generated from the questionnaire should give persons who are interested in booking a certain trip the opportunity to get authentic opinions and impressions about the travel service.

Like that it is possible to get a comprehensive impression of the hotel and the surroundings prior to the booking of a trip.

The legal basis for the processing of these data is Art. 6 Para. 1 lit. f) DSGVO.

We have a legitimate interest in processing your personal data to use the Trusted Reviews questionnaire. By using the questionnaire we and the travel mediators get a reliable evaluation and assessment of holiday experiences. The personal data processed by us to carry out the Trusted Reviews will be anonymized after five years. After expiry of this period only the submitted review with the name pseudonym you used will be stored. All personal data are deleted.

We store the personal data for this period in case of a claim by a third party. The personal data allows us - in case of a claim by a third party - to effectively clarify the facts and should allow a possibly necessary legal defense or prosecution.

We store the photos you uploaded for five years. They will be deleted after this period.

The transmission of the review only takes place if you confirm on the website that you have read and accept the general terms and conditions and have taken note of this privacy policy. Furthermore, we offer you the opportunity to get further information about the questionnaire and your review via the link "questions & answers". If you do not wish to receive any further e-mails regarding our Trusted Reviews in future, you have the opportunity to prevent another participation by means of an opt-out in the e-mail you received from us or our partner, the respective travel mediator.

## Forwarding of personal data to third parties

At the beginning of this privacy statement we explained to you for which purposes we process your personal data. We are an internationally organized company and part of the Amadeus Group. This entails that we have to forward your personal data to third parties in order to provide optimum services for you. This shall also include a cross-border exchange of personal data. This is decisive for the provision of our services.

Third parties, to which we transmit data are:

- Business partners, suppliers, subcontractors and service providers for the execution of a contract, which we have concluded with these companies or with you.
- In order to prove your identity towards all persons, to whom you send messages with information relating to the website directly via the website.
- To sponsors of advertising actions (irrespective whether the advertising actions are organized by us) or otherwise in compliance with the rules applicable for the respective advertising action. You should read the rules, if available, of each advertising action, in which you take part, carefully as under certain circumstances they contain important additional information about the use of your personal data by sponsors or third parties. Insofar as the provisions of such rules with regard to the handling of personal data stand in contradiction to this Privacy Policy, the provisions of the respective rules shall be deemed as decisive.
- To analysts and providers of search engines, which support us with the improvement and optimization of our website.
- To group companies or to third parties in the event of a restructuring, a merger, a sale, a Joint Venture, an assignment, a transfer or all other disposals over the business operation, the fixed assets or the warehouse stocks/shareholdings in their entirety or in parts (including without a restriction in conjunction with insolvency or comparable proceedings).

It is of utmost importance to us particularly that your personal data are stored and transmitted in a secure manner. For this reason we only transmit data outside of the European Economic Area or the EEA (i.e. the member states of the European Union as well as Norway, Iceland and Liechtenstein) if this complies with the data protection law and the channel for the transmission offers appropriate protection for your personal data.

This is the case:

- if a data transmission agreement is available, which includes the current standard contractual clauses, which the European Commission envisages for the transmission of personal data by responsible parties in the EEA to responsible parties and contract processors in legal systems without appropriate data protection law, or
- by the signing of the EU-U.S. Privacy Shield Framework for the transmission of personal data from companies in the EU to companies in the USA or an equivalent agreement between other legal system, or
- the transmission of your data to a country, in which a standard of data protection exists as stipulated by law that was assessed as appropriate by the European Commission, or
- if it is necessary for the conclusion or the processing of a contract between us and a third party and the transmission is in your interest for the purpose of this contract (for example if we must transmit data outside of the EEA in order to fulfill our obligations from this contract if you are a customer of our company), or
- if you have granted your consent for the data transmission.

In order to ensure that your personal data enjoy an appropriate degree of protection we have implemented suitable measures with third parties with which we share your personal data in order to ensure that your personal data are processed by these third parties in a manner that is consistent with the data protection rights that is in line with the data protection laws.

You can read the legal provisions of the GDPR concerning the forwarding of data to third parties in the full text here <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&rid=1>.

## Security

In order to guarantee the protection of the personal data controlled by us, we take all organizational, technical and administration-related measures to a reasonable extent. Unfortunately, no 100% security can be guaranteed for data transmissions via the internet or for data storage systems. Please do not send us any confidential information by e-mail. If you have cause to assume that your interaction with us is no longer secure (if, for example, you are convinced that the safety of an account, which you have set up in our company, is no longer guaranteed), you must inform us of the problem without delay by contacting us using the contact information on the website (please note that if you contact us by normal post the processing of your problem by us may be delayed). Moreover, please note that the communication by e-mail is not inevitably secure. Accordingly, you should not enter any credit card information in your e-mail correspondence with us.

## Duration of the storage / deletion

We have explained to you above for the respective individual case how long we store your personal data and when we delete them.



In general we will store your personal data during a deadline, which is required in order to fulfill the purposes stated in this Privacy Policy, unless a longer storage deadline is necessary or is permitted by virtue of the law.

If the purpose of the storage ceases to apply or if a storage deadline expires that is stipulated by the European body for the issue of Directives and Regulations or another responsible legislator, the personal data will be blocked or deleted as a routine and in compliance with the statutory regulations.

## Instruction regarding the use of the website by children

The website is not oriented to individuals under the age of eighteen (18) years old. We request these persons not to make any personal data available via the website.

## Rights of the data subjects

According to the GDPR you are entitled to the following rights against us:

- **Right of access by the data subject pursuant to Art. 15 GDPR**
- **Right to rectification Art. 16 GDPR**
- **Right to erasure (“right to be forgotten”) Art. 17 GDPR**
- **Right to restriction of processing Art. 18 GDPR**
- **Right to notification Art. 19 GDPR**
- **Right to data portability Art. 20 GDPR**

The following link <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&rid=1> leads you directly to the text of the GDPR law.

## Separate information relating to the right of the data subject to file an objection Art. 21 GDPR

You have the right, for reasons, which arise from your special situation, to file an objection at all times against the processing of the personal data relating to you that is carried out owing to Art. 6 Para. 1 lit. e or f GDPR; this shall also apply to a profiling that is supported on these provisions.

We will no longer process the personal data relating to you, unless we can prove essential reasons worthy of protection for the processing, which outweigh your interests, rights and freedom, or the processing serves the assertion, exercising or defense against legal claims.

If the personal data relating to you are processed in order to conduct direct advertising you have the right to file an objection against the processing of the personal data relating to you for the purpose of such advertising at all times; this shall also apply to the profiling insofar as it is associated with such direct advertising.

If you object to the processing for purposes of direct advertising then the personal data relating to you will no longer be processed for these purposes.

## Right to revocation of the declaration of consent under data protection law

You have the right to revoke your declaration of consent under data protection law at all times. The lawfulness of the processing carried out owing to the consent until the revocation will not be affected by the revocation of the consent.

This right is concluded from Art. 7 Para. 3 GDPR. [This link](#) will lead you directly to the text of the GDPR law.

## Right to lodge a complaint at a supervisory authority

Irrespective of any other legal remedy under administrative law or in court you are entitled to the right to lodge a complaint at a supervisory authority, in particular in the member state of your habitual residence, your place of work or the place of the alleged infringement if you are of the opinion that the processing of the personal data relating to you breaches the GDPR.

The supervisory authority, at which the complaint was lodged, will inform the complainant about the status and the results of the complaint including the possibility of a legal remedy in court according to Art. 78 GDPR.