

PRIVACY POLICY WEBSITE

1. Introduction

In the following, we provide information about the collection of personal data when using

- our website <https://seebnb.at/>
- our profiles in social media.

Personal data is any data that can be related to a specific natural person, such as their name or IP address.

1.1. Contact details

The controller within the meaning of Art. 4 para. 7 EU General Data Protection Regulation (GDPR) is keyone Betriebs GmbH, 1, 9220 Velden am Wörthersee, Austria , email: office@seebnb.at. We are legally represented by Moritz Schröcksnadel und Robert Larcher.

Our data protection officer can be reached via heyData GmbH, Schützenstraße 5, 10117 Berlin, www.heydata.eu, E-Mail: datenschutz@heydata.eu.

1.2. Scope of data processing, processing purposes and legal bases

We detail the scope of data processing, processing purposes and legal bases below. In principle, the following come into consideration as the legal basis for data processing:

- Art. 6 para. 1 s. 1 lit. a GDPR serves as our legal basis for processing operations for which we obtain consent.
- Art. 6 para. 1 s. 1 lit. b GDPR is the legal basis insofar as the processing of personal data is necessary for the performance of a contract, e.g. if a site visitor purchases a product from us or we perform a service for him. This legal basis also applies to processing that is necessary for pre-contractual measures, such as in the case of inquiries about our products or services.
- Art. 6 para. 1 s. 1 lit. c GDPR applies if we fulfill a legal obligation by processing personal data, as may be the case, for example, in tax law.
- Art. 6 para. 1 s. 1 lit. f GDPR serves as the legal basis when we can rely on legitimate interests to process personal data, e.g. for cookies that are necessary for the technical operation of our website.

1.3. Data processing outside the EEA

Insofar as we transfer data to service providers or other third parties outside the EEA, the security of the data during the transfer is guaranteed by adequacy decisions of the EU Commission, insofar as they exist (e.g. for Great Britain, Canada and Israel) (Art. 45 para. 3 GDPR).

In the case of data transfer to service providers in the USA, the legal basis for the data transfer is an adequacy decision of the EU Commission if the service provider has also certified itself under the EU US Data Privacy Framework.

In other cases (e.g. if no adequacy decision exists), the legal basis for the data transfer are usually, i.e. unless we indicate otherwise, standard contractual clauses. These are a set of rules adopted by the EU Commission and are part of the contract with the respective third party. According to Art. 46 para. 2 lit. b GDPR, they ensure the security of the data transfer. Many of the providers have given contractual guarantees that go beyond the standard contractual clauses to protect the data. These include, for example, guarantees regarding the encryption of data or regarding an obligation on the part of the third party to notify data subjects if law enforcement agencies wish to access the respective data.

1.4. Storage duration

Unless expressly stated in this privacy policy, the data stored by us will be deleted as soon as they are no longer required for their intended purpose and no legal obligations to retain data conflict with the deletion. If the data are not deleted because they are required for other and legally permissible purposes, their processing is restricted, i.e. the data are blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons.

1.5. Rights of data subjects

Data subjects have the following rights against us with regard to their personal data:

- Right of access,
- Right to correction or deletion,
- Right to limit processing,
- **Right to object to the processing,**
- Right to data transferability,
- **Right to revoke a given consent at any time.**

Data subjects also have the right to complain to a data protection supervisory authority about the processing of their personal data. Contact details of the data protection supervisory authorities are available at

<https://www.bfdi.bund.de/EN/Service/Anschriften/Laender/Laender-no-de.html>.

1.6. Obligation to provide data

Within the scope of the business or other relationship, customers, prospective customers or third parties need to provide us with personal data that is necessary for the establishment, execution and termination of a business or other relationship or that we are legally obliged to collect. Without this data, we will generally have to refuse to conclude the contract or to provide a service or will no longer be able to perform an existing contract or other relationship.

Mandatory data are marked as such.

1.7. No automatic decision making in individual cases

As a matter of principle, we do not use a fully automated decision-making process in accordance with article 22 GDPR to establish and implement the business or other relationship. Should we use these procedures in individual cases, we will inform of this separately if this is required by law.

1.8. Making contact

When contacting us, e.g. by e-mail or telephone, the data provided to us (e.g. names and e-mail addresses) will be stored by us in order to answer questions. The legal basis for the processing is our legitimate interest (Art. 6 para. 1 s. 1 lit. f GDPR) to answer inquiries directed to us. We delete the data accruing in this context after the storage is no longer necessary or restrict the processing if there are legal retention obligations.

Data transfer to social media platforms: Your email address will be transmitted in encrypted form (e.g. hashing procedure) to selected social media platforms, including:

1. Meta Platforms, Inc. (Facebook, Instagram)
2. Google LLC (YouTube)
3. LinkedIn Corporation (LinkedIn)

These platforms may use the information to display targeted advertising to other users with similar interests.

Purpose of processing:

The processing is carried out solely for the purpose of promoting services and products that may be of interest to the owner of a holiday property.

1.9. Customer surveys

From time to time, we conduct customer surveys to get to know our customers and their wishes better. In doing so, we collect the data requested in each case. It is our legitimate interest to get to know our customers and their wishes better, so that the legal basis for the associated data processing is Art. 6 para. 1 s. 1 lit f GDPR. We delete the data when the results of the surveys have been evaluated.

2. Newsletter

We reserve the right to inform customers who have already used services from us or purchased goods from time to time by e-mail or other means about our offers, if they have not objected to this. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. f GDPR. Our legitimate interest is to conduct direct advertising (recital 47 GDPR). Customers can object to the use of their e-mail address for advertising purposes at any time without incurring additional costs, for example via the link at the end of each e-mail or by sending an e-mail to our above-mentioned e-mail address.

Interested parties have the option to subscribe to a free newsletter. We process the data provided during registration exclusively for sending the newsletter. Subscription takes place by selecting the corresponding field on our website, by ticking the corresponding field in a paper document or by another clear action, whereby interested parties declare their consent to the processing of their data, so that the legal basis is Art. 6 para. p. 1 lit. a GDPR. Consent can be revoked at any time, e.g. by clicking the corresponding link in the newsletter or notifying our e-mail address given above. The processing of the data until revocation remains lawful even in the event of revocation.

Based on the consent of the recipients (Art. 6 para. 1 s. 1 lit. a GDPR), we also measure the opening and click-through rate of our newsletters to understand what is relevant for our audience.

We send newsletters with the tools

- Pipedrive of the provider Pipedrive OÜ, Mustamäe tee 3a, 10615 Tallinn, Estonia. The provider processes content, usage, meta/communication data and contact data in the process in the EU. Further information is available in the provider's privacy policy at <https://www.pipedrive.com/en/privacy>.
- Salesforce of the provider salesforce.com Germany GmbH, Erika-Mann-Straße 31-37, 80636 Munich. The provider processes content, usage, meta/communication data and contact data in the process in the EU. Further information is available in the provider's privacy policy at <https://www.salesforce.com/company/privacy/>.

- Numbirds of the provider NumBirds GmbH, Gottfried-Hagen-Str. 22, 51105 Köln. The provider processes content, usage, meta/communication data and contact data in the process in the EU. Further information is available in the provider's privacy policy at <https://numbirds.com/datenschutz/>.

3. Data processing on our website

3.1. Notice for website visitors from Germany

Our website stores information in the terminal equipment of website visitors (e.g. cookies) or accesses information that is already stored in the terminal equipment (e.g. IP addresses). What information this is in detail can be found in the following sections.

This storage and access is based on the following provisions:

- Insofar as this storage or access is absolutely necessary for us to provide the service of our website expressly requested by website visitors (e.g., to carry out a chatbot used by the website visitor or to ensure the IT security of our website), it is carried out on the basis of Section 25 para. 2 no. 2 of the German Telecommunications Digital Services Data Protection Act

(Telekommunikation-Digitale-Dienste-Datenschutzgesetz, "TDDDG").

- Otherwise, this storage or access takes place on the basis of the website visitor's consent (Section 25 para. 1 TDDDG).

The subsequent data processing is carried out in accordance with the following sections and on the basis of the provisions of the GDPR.

3.2. Informative use of our website

During the informative use of the website, i.e. when site visitors do not separately transmit information to us, we collect the personal data that the browser transmits to our server in order to ensure the stability and security of our website. This is our legitimate interest, so that the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

These data are:

- IP address
- Date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- Amount of data transferred in each case
- Website from which the request comes
- Browser
- Operating system and its interface
- Language and version of the browser software.

This data is also stored in log files. They are deleted when their storage is no longer necessary, at the latest after 14 days.

3.3. Web hosting and provision of the website

Our website is hosted by world4you. The provider is World4You Internet Services GmbH, Hafenstraße 35, 4020 Linz, Austria. In doing so, the provider processes the personal data transmitted via the website, e.g. content, usage, meta/communication data or contact data, in the EU. Further information can be found in the provider's privacy policy at <https://www.world4you.com/unternehmen/datenschutzerklaerung>.

It is our legitimate interest to provide a website, so the legal basis of the described data processing is Art. 6 para. 1 s. 1 lit. f GDPR.

We use a content delivery network to help provide our website. The provider is Wordpress. The provider thereby processes the personal data transmitted via the website, e.g. on content, usage, meta/communication data or contact data. It is our legitimate interest to provide a website, so that the legal basis for data processing is Art. 6 para. 1 s. 1 lit. f GDPR.

3.4. Contact form

When contacting us via the contact form on our website, we store the data requested there and the content of the message.

The legal basis for the processing is our legitimate interest in answering inquiries directed to us. The legal basis for the processing is therefore Art. 6 para. 1 s. 1 lit. f GDPR.

We delete the data accruing in this context after the storage is no longer necessary or restrict the processing if there are legal retention obligations.

3.5. Vacant positions

We publish vacant positions on our website, on pages linked to the website or on third-party websites.

The processing of the data provided as part of the application is carried out for the purpose of implementing the application process. Insofar as this is necessary for our decision to establish an employment relationship, the legal basis is Art. 88 para. GDPR in conjunction with Sec. 26 para. 1 of the German Data Protection Act (Bundesdatenschutzgesetz). We have marked the data required to carry out the application process accordingly or refer to them. If applicants do not provide this data, we cannot process the application. Further data is voluntary and not required for an application. If applicants provide further information, the basis is their consent (Art. 6 para. 1 s. 1 lit. a GDPR).

We ask applicants to refrain from providing information on political opinions, religious beliefs and similarly sensitive data in their CV and cover letter. They are not required for an application. If applicants nevertheless provide such information, we cannot prevent their

processing as part of the processing of the resume or cover letter. Their processing is then also based on the consent of the applicants (Art. 9 para. 2 lit. a GDPR).

Finally, we process the applicants' data for further application procedures if they have given us their consent to do so. In this case, the legal basis is Art. 6 para. 1 s. 1 lit. a GDPR.

We pass on the applicants' data to the responsible employees in the HR department, to our data processors in the area of recruiting and to the employees otherwise involved in the application process.

If we enter into an employment relationship with the applicant following the application process, we delete the data only after the employment relationship has ended. Otherwise, we delete the data no later than six months after rejecting an applicant.

If applicants have given us their consent to use their data for further application procedures as well, we will not delete their data until one year after receiving the application.

3.6. Reservations on the website

Site visitors can make bookings through our website. In doing so, we process the following data as part of the booking process:

- name,
- email,

- address,
- telephone number,
- payment data

The processing of the data is carried out for the performance of the contract concluded with the respective site visitor (Art. 6 para. 1 s. 1 lit. b GDPR).

Your digital registration

In Austria, we are legally obliged to collect and forward the data of all passengers in accordance with the Austrian Registration Act. For this purpose, we use CheKin (Chekin Soluciones Digitales, S.L). The legal basis for data processing is then Art. 6 (1) point c GDPR.

In this context, the following data is processed:

- Name
- Date of birth
- Sex
- E-mail address
- Telephone number
- Nationalities
- Address
- ID card/passport

Further information can be found in the provider's privacy policy at <https://chekin.com/de/allgemeine-datenschutzbestimmungen/>.

3.7. Customer account (Gäste-App)

Guests with a booking within the 'keyone' group of companies (keyone GmbH, Holiday Flats 24 Austria GmbH and keyone Betriebs GmbH) will receive a link to the guest app after the booking process. Guests can log in with their booking number and surname and manage their booking and additional services. The data provided is already available through the guest booking that has been made, so it is possible to log in without an email address. In this context, we process

- surname
- date of arrival
- IP address

The provider of our Gäste-App is Keyone GmbH, Tiergartenstraße 102, 6020 Innsbruck, Austria.

We process the data requested in this context to fulfill the respective user contract concluded via the account, so that the legal basis for the processing is Art. 6 para. 1 sentence 1 lit. b GDPR. We delete the data if there are no retention rights or obligations when users delete their user account. After departure, i.e. after the end of the booking, it is no longer possible to log in to the guest app.

Additional services

Through our Gäste-App, we offer the option of booking additional services (e.g. shuttle services, ski rental) through external partners. We do not process any personal data requested for the additional services, but only set a cookie to record clicks on the buttons for the extra

services. You will only be redirected to the external partner, who may collect data.

The legal basis for the data processing is your consent (Art. 6 para. 1 lit. a GDPR). This consent can be withdrawn at any time, for example by contacting us using the contact details provided in our privacy policy. The withdrawal of consent does not affect the lawfulness of the processing carried out until the withdrawal of consent. A withdrawal of consent with the external partner must be made with the external partner.

3.8. Payment processors

For the processing of payments, we use payment processors who are themselves data controllers within the meaning of Art. 4 No. 7 GDPR. Insofar as they receive data and payment data entered by us in the ordering process, we thereby fulfill the contract concluded with our customers (Art. 6 para. 1 s. 1 lit. b GDPR).

These payment processors are:

- Klarna Bank AB (publ), Sweden (for "Klarna Sofort")
- Mastercard Europe SA, Belgium
- Stripe Payments Europe, Ltd., Ireland
- Visa Europe Services Inc., Great Britain

3.9. Technically necessary cookies

Our website sets cookies. Cookies are small text files that are stored in the web browser on the end device of a site visitor. Cookies help to make the offer more user-friendly, effective and secure. Insofar as these cookies are necessary for the operation of our website or its functions (hereinafter "Technically Necessary Cookies"), the legal basis for the associated data processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in providing customers and other site visitors with a functional website.

Specifically, we set technically necessary cookies for the following purpose or purposes:

- cookies that store login data,
- cookies that remember search terms and
- cookies that adopt language settings

3.10. Third parties

3.10.1. Cookiebot

We use Cookiebot to manage consents. The provider is Usercentrics A/S, Havnegade 39, DK-1058, Copenhagen. The provider processes meta/communication data (e.g. device information, IP addresses) in the EU.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in managing the consent of website visitors to cookies in a simple manner.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://www.cookiebot.com/en/privacy-policy/>.

3.10.2. Feratel Deskline

We use Feratel Deskline and Booking & More for the bookings. The provider is feratel media technologies AG, Maria-Theresien-Straße 8, A-6020 Innsbruck, Austria. The provider processes usage data (e.g. web pages visited, interest in content, access times), contact data (e.g. e-mail addresses, telephone numbers), location data, and meta/communication data (e.g. device information, IP addresses) in the EU.

The legal basis for the processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in promoting tourism offers.

The data will be deleted when the purpose for which it was collected no longer applies and there is no obligation to retain it. Further information is available in the provider's privacy policy at <https://www.feratel.de/datenschutz/>.

3.10.3. heyData

We have integrated a data protection seal on our website. The provider is heyData GmbH, Schützenstraße 5, 10117 Berlin, Germany. The provider processes meta/communication data (e.g. IP addresses) in the EU.

The legal basis of the processing is Art. 6 para. 1 s. 1 lit. f GDPR. We have a legitimate interest in providing website visitors with confirmation of our data privacy compliance. At the same time, the provider has a legitimate interest in ensuring that only customers with existing contracts use its seals, which is why a mere image copy of the certificate is not a viable alternative as confirmation.

As the data is masked after collection, there is no possibility to identify website visitors. Further information is available in the privacy policy of the provider at <https://heydata.eu/en/privacy-policy>.

4. Data processing on social media platforms

We are represented in social media networks in order to present our organization and our services there. The operators of these networks regularly process their users' data for advertising purposes. Among other things, they create user profiles from their online behavior, which are used, for example, to show advertising on the pages of the networks and elsewhere on the Internet that corresponds to the interests of the users. To this end, the operators of the networks store information on user behavior in cookies on the users' computers.

Furthermore, it cannot be ruled out that the operators merge this information with other data. Users can obtain further information and instructions on how to object to processing by the site operators in the data protection declarations of the respective operators listed below. It is also possible that the operators or their servers are located in non-EU countries, so that they process data there. This may result in risks for users, e.g. because it is more difficult to enforce their rights or because government agencies access the data.

If users of the networks contact us via our profiles, we process the data provided to us in order to respond to the inquiries. This is our legitimate interest, so that the legal basis is Art. 6 para. 1 s. 1 lit. f GDPR.

4.1. Facebook

We maintain a profile on Facebook. The operator is Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here:

<https://www.facebook.com/policy.php>. A possibility to object to data processing arises via settings for advertisements:

<https://www.facebook.com/settings?tab=ads>.

We are joint controllers for processing the data of visitors to our profile on the basis of an agreement within the meaning of Art. 26 GDPR with Facebook. Facebook explains exactly what data is processed at https://www.facebook.com/legal/terms/information_about_page_insights_data. Data subjects can exercise their rights both against us and against Facebook. However, according to our agreement with Facebook, we are obliged to forward requests to Facebook. Data

subjects will therefore receive a faster response if they contact Facebook directly.

4.2. Instagram

We maintain a profile on Instagram. The operator is Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The privacy policy is available here: <https://help.instagram.com/519522125107875>.

5. Changes to this privacy policy

We reserve the right to change this privacy policy with effect for the future. A current version is always available here.

6. Questions and comments

If you have any questions or comments regarding this privacy policy, please feel free to contact us using the contact information provided above.