

## Data Protection

Welcome to Heidelberg Marketing GmbH and our online offer, in particular at [www.heidelberg-marketing.de](http://www.heidelberg-marketing.de)

We are happy that we have raised your interest in our region and our offers. Protection of your privacy and your personal data is very important to us. Therefore, your data will always be collected and used in harmony with the provisions of the General Data Protection Regulation (EU) 2016/679 (GDPR), the Federal Data Protection Act (BDSG) and the Telemedia Act (TMG). Hereinafter, we - as controller for processing activities - inform you of which data we collect and how we process these data.

### 1. Personal data

Personal data within the meaning of the GDPR means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Storage of personal data will only take place as far as this is required to provide the booked service, to comply with statutory specifications or for the purpose indicated as a consequence.

### 2. Anonymised data/logfiles

You may visit our website without collection of any personal data being required. Nevertheless, certain anonymised data will be stored every time you visit our website, e.g. on which page or which offer was called up. These data are, however, not personal data and therefore not subject to the statutory provisions of the GDPR or the BDSG.

The website operator or page operator collects data concerning access to the page and stores them as "server logfiles". The following data are logged this way:  
Visited website, time at the time of access, data volume in byte, source/reference from which you reached the page, browser used, operating system used, internet protocol address used.

The collected data only serve statistical evaluation and improvement of the website. The website operator reserves subsequent review of the log files if any specific indications suggest illegal use, however.

The collection of anonymous data will only take place for statistical evaluation in order to improve our offer. Concerning this, please note the item "Right to information/revocation right".

### 3. Purpose of collection of personal data

The collection of personal data becomes unavoidable, however, if you book any stay or other service via our portal, subscribe to our newsletter or want to use other offers of our page for the processing of which personal data cannot be avoided. This includes gift voucher purchases as well as participation in lotteries.

In correspondence with the statutory provisions and within the meaning of data economy, only such data are usually collected for this that are required for provision of the specific service. As far as we request the indication of any further information, it is always given freely and marked as such.

The temporary storage of the internet protocol address by the system was necessary in order to make it possible to send the website to the user's computer. For this, the user's internet protocol address must remain stored for the duration of the session. Storage in log files shall

furthermore take place in order to ensure the function of the website. We also use the data for optimisation of the website and to ensure the security of our information-technical systems. The data are not evaluated for marketing purposes in this context. These purposes also reflect our legitimate interest in the processing activities in accordance with point (f) of Article 6(1) GDPR.

In case of booking a stay or any other services, the data collected for this are used for processing of this booking within the statutory specifications for advertising purposes and for statistical purposes.

The legal basis for sending out the newsletter due to sale of goods or services shall be § 7 para. 3 UWG.

If you subscribe to our newsletter, we furthermore store and use the data indicated by you at booking concerning your person and your travel based on point (f) of Article 6(1) GDPR in order to support you as a newsletter subscriber in the best manner.

The legal basis for processing of the data after registration for the newsletter by the user is point (a) of Article 6(1) GDPR if the user's consent is given.

Apart from this, we use the personal data stored by us for maintenance of customer relationships, customer support (e.g. information on the progress of your stay), execution of advertising and marketing measures (e.g. sending of catalogues or other advertising shipments within the legally admissible framework, questions about customer satisfaction) and order processing.

#### **4. The legal basis for processing of personal data**

As far as we collect the consent of the data subject for processing activities of personal data, point (a) of Article 6(1) of the EU General Data Protection Regulation (GDPR) serves as the legal basis.

For legal processing of personal data that is required to perform a contract of which the data subject is a party, point (b) of Article 6(1) GDPR serves as the legal basis. This also applies to processing activities that are required to perform pre-contractual measures.

As far as processing of personal data is required to perform a legal obligation that our company is subject to, point (c) of Article 6(1) GDPR serves as the legal basis.

If any vital interests of the data subject or any other natural person require processing of personal data, point (d) of Article 6(1) GDPR serves as the legal basis.

If processing is required to maintain a legitimate interest of our company or a third party and if the interests, fundamental rights and fundamental freedoms of the data subject do not override the former interest, point (f) of Article 6(1) GDPR serves as the legal basis for processing.

#### **5. Passing on of personal data to third parties**

Your personal data will only be passed on within the relevant specifications, in particular under data protection and competition law.

As far as this is required for the services contractually owed by us or our statutory obligations, your data will also be passed on to the subcontractors or service providers for provision of the service in our name or on our order (e.g. technical processing of the mail and email dispatch, payment processing, customer service).

Beyond this, data will be passed on to persons or companies for processing of your booking, in particular to airlines, travel organisers, hotels, travel agencies, rental car companies, cruise companies, public authorities, etc. Note in this respect that the provisions under data protection law at the registered office of such persons and companies may deviate from those in Germany.

Disclosure and transfer of data to third parties beyond this shall take place as far as we are obligated to do so by law or based on final court proceedings.

You have the right to receive the personal data concerning you that you have provided to us in a structured, common and machine-readable format. In addition to this, you have the right to transmit these data to another controller without any impairment by the controller to whom the personal data were provided.

## **6. Storage and erasure of data**

Your personal data will be stored within the context of the purposes named in the item "Purpose of collection of personal data". The personal data of the data subject will be deleted or blocked as soon as the purpose of storage no longer applies. Storage may further take place when this is stipulated by the European or national legislator in regulations under Union law, laws or other rules that the controller is subject to. The legislator has passed diverse storage obligations and time limits. Blocking or erasure of the data shall also take place if a storage period required by the standards named expires, except if further storage of the data is required for conclusion of a contract or performance of a contract.

## **7. Use of cookies**

We use cookies (small computer files with text information that the web server sends to your internet browser) in order to improve your experience when you visit our online offers. For example, some notes only appear once if you allow us to place a cookie. Our cookies also have an expiration date. If you manually delete your cookies before its expiration, you will receive a new one at your next visit to our site if you do not block recording of cookies.

The technical specifications stipulate that only the server by which a cookie was sent can also read it. We assure you that we do not store any personal data in cookies.

Use of our offers is, unfortunately, only partially possible if you do not accept any cookies. Therefore, we recommend permanently activating the cookies for our website. Most web browsers are set so that they accept cookies automatically. You can deactivate storage of cookies, however, and set your web browser so that it will inform you as soon as cookies are sent.

The legal basis for processing of personal data using cookies is point (a) of Article 6(1) GDPR.

The legal basis for processing of personal data using cookies for analysis purposes is point (a) of Article 6(1) GDPR if the user has consented to this.

## **8. Use of Google Analytics**

This website uses Google Analytics, a web analysis service of Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google"). Google Analytics uses "cookies", i.e. text files that are stored on your computer and that permit analysis of your use of the website. The information produced by the cookie regarding your use of this website (including your internet protocol address) is transferred to a server of Google in the USA and stored there. Google will use this information to evaluate your use of the website, in order to compile reports on the website activities and to provide further services connected to website use and internet use for the website operators. Google will also transfer this information to third parties if this is required by law or as far as third parties process these personal data based on the order of Google. In no case will Google combine your internet protocol address with any other personal data of Google. You may prevent installation of the cookies by making the corresponding settings in your browser software; however, note that you may be unable to fully use all functions of the website in such a case. By using this website, you agree to processing of the data collected concerning you by Google in the manner described above and for the purpose named.

The Google tracking codes of this website use the function "\_anonymizeIp()"; thus, internet protocol addresses will only be processed further abbreviated, in order to prevent direct reference to a person. You may object to data collection and storage at any time, effective for the future. Clicking the button "Deactivate" prevents tracking entirely. For a permanent objection, the browser used must accept cookies. Alternatively, you can object to data collection by using a Google browser plugins in order to prevent the information (including your internet protocol address) collected by the cookies from being sent to Google Inc. and used by Google Inc. The following link will take you to the corresponding plugin: <https://tools.google.com/dlpage/gaoptout?hl=de>

## 9. Facebook social plugins

This website uses social plugins ("Plugins") of the social network [\[url=http://facebook.com\]](http://facebook.com) facebook.com [\[/url\]](#), which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). The plugins are recognisable by one of the Facebook logos (white "f" on a blue tile or a "Thumbs up" sign) or are marked with the addition "Facebook Social Plugin". The list and appearance of the Facebook Social Plugins can be viewed here: [\[url=http://developers.facebook.com/plugins\]](http://developers.facebook.com/plugins) [developers.facebook.com/plugins](http://developers.facebook.com/plugins) [\[/url\]](#)[\[url=http://developers.facebook.com/plugins.\]](http://developers.facebook.com/plugins) [\[/url\]](#) When a website of this internet offer that contains such a plugin is called up, the browser used will establish a direct connection to the servers of Facebook. The content of the plugin will be directly transmitted to the browser you use by Facebook and integrated into the website by it. The provider therefore cannot influence the scope of the data that Facebook collects with this plugin and therefore informs according to its knowledge: by integration of the plugin, Facebook will be informed that the corresponding page of our website was called up. If the visitor is logged in at Facebook, Facebook will be able to assign the visit to his or her Facebook account. If the visitor interacts with the plugins (e.g. by clicking the button "Like" or by commenting), the corresponding information will be transmitted to Facebook directly by his or her browser and stored there. If the visitor is not a member of Facebook, it is nevertheless possible that Facebook will learn of his or her internet protocol address and store it. The purpose and extent of data collection and further processing and use of the personal data by Facebook as well as the rights in this regard and setting options to protect privacy can be found in the data privacy notes of Facebook: [\[url=http://www.facebook.com/policy.php\]](http://www.facebook.com/policy.php) [www.facebook.com/policy.php](http://www.facebook.com/policy.php) [\[/url\]](#)[\[url=http://www.facebook.com/policy.php.\]](http://www.facebook.com/policy.php) [\[/url\]](#) If the visitor is a member of Facebook and does not want that Facebook collects data concerning him or her on this website and links them to his membership data stored at Facebook, the visitor must log out at Facebook before visiting this website. It is also possible to block Facebook social plugins with add-ons for the browser used, such as the "Facebook Blocker".

## 10. Facebook conversion pixel

This website uses the "Facebook Pixel" of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). This permits tracking the behaviour of users after they have viewed or clicked a Facebook ad. This procedure serves to evaluate the effectiveness of the Facebook ads for statistical and market research purposes and can contribute to optimising future advertising measures.

The collected data are anonymous for us, and therefore do not permit any conclusions as to the identity of the users. However, the data will be stored and processed by Facebook so that connection to the respective user profile is possible and Facebook may use the data for its own purposes of marketing according to the Facebook directive on the use of data (<https://www.facebook.com/about/privacy/>). The user can enable Facebook and its partners to place advertisements on and outside of Facebook. It may further store a cookie on his or her computer for these purposes. By visiting our website and our Facebook page, you agree with this use. In order to object to use of cookies on the computer in general, the web browser can be set so that no cookies can be stored on the computer anymore in future or

that cookies already stored will be deleted. Deactivation of all cookies may, however, make it impossible to perform some functions on our websites. The user may deactivate use of cookies by third-party providers such as Facebook also using the following website of the Digital Advertising Alliance: <http://www.aboutads.info/choices/>

### **11. Use of the Instagram button**

This website uses Social Media Plugins from the social network Instagram, which is operated by Instagram Inc., 1601 Willow Road, Menlo Park, California, 94025, USA. The Instagram plugin can be recognised by the "Instagram button" on our homepage.

If you push the Instagram button while you are logged in with your Instagram account, contents of our website may be linked to your Instagram profile. This way, Instagram can assign your visit of our sites to your user account.

We explicitly note that we as providers of the websites do not have any knowledge of the content of the transmitted personal data and their use by Instagram. For more information on this, see the data privacy statement of Instagram at: <http://instagram.com/about/legal/privacy>

### **12. YouTube**

This website uses a link to YouTube of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. We use the "expanded data protection mode" for embedding, so that usage information will only be transferred when the video is started. In such a case, the information of which specific page of our website you are visiting and which video you are viewing will be transmitted. If you are logged in with your YouTube account during this, you enable YouTube to associate your page accesses with you personally. Further information on collection and processing of your data by YouTube is available from the corresponding data protection notes at [www.youtube.com](http://www.youtube.com).

If you want to ensure that no data on you are stored at YouTube, do not click the embedded videos.

### **13. Security, questions and suggestions, controller**

Security is not least also dependent on your system. Always treat your access credentials confidentially, never let the web browser store any passwords, and close the web browser window when you end your visit to our website. This way, access to your data will become more difficult for third parties.

Use an operating system that can manage user rights. Set up multiple users on your system even within the family and never use the internet with administration rights. Use security software such as virus scanners and firewalls and keep your system up to date at all times.

The controller for this website within the meaning of the General Data Protection Regulation and other national data protection laws of the Member States and other provisions under data protection law is:

Heidelberg Marketing GmbH

Neuenheimer Landstraße 5

D-69120 Heidelberg

Phone: +49 6221 58 44 444

Fax: +49 6221 58 40 222

Email: [info\(at\)heidelberg-marketing.de](mailto:info(at)heidelberg-marketing.de)

[www.heidelberg-marketing.de](http://www.heidelberg-marketing.de)

### **14. Right to information/revocation rights; further data subject's rights**

You have the right:

- to demand information in accordance with Article 15 GDPR regarding processing of your personal data by us. In particular, you may request information on the processing purposes, category of personal data, categories of recipients to whom your data have been or will be disclosed, the planned storage duration, the existence of a right to rectification, erasure, restriction of processing or objection, existence of a right to lodge a complaint, origin of your data if they were not collected at our site, and the existence of automated decision-making, including profiling and any indicative information on its details;
- to demand rectification of any inaccurate personal data stored by us or completion of these without undue delay in accordance with Article 16 GDPR;
- to demand erasure of your personal data stored by us as far as processing is not required in order to exercise the right to freedom of expression and information, to comply with a legal obligation, for reasons of public interest or for assertion, exercise or defence of legal claims, in accordance with Article 17 GDPR;
- to demand restriction of processing of your personal data in accordance with Article 18 GDPR as far as the accuracy of the data is disputed by you, processing is not legitimate, but you decline erasure and we no longer require the personal data, but you still require them to assert, exercise or defend legal claims or you have objected to processing in accordance with Article 21 GDPR;
- to demand to receive your personal data that you have provided to us in a structured, common and machine-readable format or to demand transfer to another controller in accordance with Article 20 GDPR;
- to withdraw your consent once given to us towards us at any time in accordance with Article 7(3). This has the consequence that we may no longer continue the processing activities that were based on this consent in future GDPR and
- to lodge a complaint with a supervisory authority in accordance with Article 77 GDPR. Usually, you may contact the supervisory authority at your common place of residence or work place or our registered office for this.

Of course, you have these rights free of charge. In order to withdraw your consent to use of data, request access or rectification, blocking or erasure, or to exercise the other data subject's rights, contact:

Heidelberg Marketing GmbH  
Neuenheimer Landstraße 5  
D-69120 Heidelberg  
Phone: +49 6221 58 44 444  
Fax: +49 6221 58 40 222  
Email: [info\(at\)heidelberg-marketing.de](mailto:info(at)heidelberg-marketing.de)

Below, we also disclose the contact address of our company's data protection officer.

Our data protection officer is:

Jan Löschmann  
+49 6221 58 40 216

[datenschutzbeauftragter\(at\)heidelberg-marketing.de](mailto:datenschutzbeauftragter(at)heidelberg-marketing.de)

[www.baden-wuerttemberg.datenschutz.de/kontakt](http://www.baden-wuerttemberg.datenschutz.de/kontakt)

Please do not contact the data protection officer directly to exercise your data subject's rights, e.g. to access, rectification, blocking or erasure of your personal data, but first contact the department of the data protection officer directly as indicated above. It will process your request without delay.

## **15. Newsletter unsubscription**

If you no longer wish to receive our newsletter or our advertising emails, click the link: "Unsubscribe from newsletter", which is included at the end of all emails sent by us.