



Privacy Policy

This privacy policy clarifies the nature, scope and purpose of the processing of personal data (hereinafter referred to as "data") within our online service and related websites, features and content, as well as our external online presence, e.g. our social media profile (collectively referred to as the "online service"). With regard to the terminology used, e.g. "processing" or "responsible bodies", we refer to the definitions in Art.4 of the General Data Protection Regulation (GDPR).

RESPONSIBLE BODY, CONTACT ADDRESS

The responsible body in terms of data protection law is

Gubelhof Suites
Gubelstrasse 7
CH – 6300 Zug

Telefon: 0041 79 358 60 88
E-Mail: info@gubelhof-suites.ch

If you have questions about this statement or about how to exercise your rights, please contact our Privacy Officer.

Managing Director/Owner: Maria Coli und Bardhyl Coli
Data Protection Officer contact: maria@gubelhof-suites.ch
Link to imprint: <https://www.gubelhof-suites.ch/kontakt/impressum/>

TYPES OF PROCESSED DATA:

- Inventory data (e.g., names, addresses).
- Contact information (e.g., email, phone numbers).
- Content data (e.g., text input, photographs, videos).
- Usage data (e.g., websites visited, interest in content, access times).
- Meta/communication data (e.g., device information, IP addresses).

CATEGORIES OF DATA SUBJECTS

Visitors and users of the online offer (hereinafter we refer to the data subjects as "users").



PURPOSE OF DATA PROCESSING

- Provision of the online service, its functions and contents.
- Answering contact requests and communicating with users.
- Security measures.
- Reach measurement/marketing

TERMS USED

"Personal data" means any information relating to an identified or identifiable natural person (hereinafter the "data subject"); a natural person is considered as identifiable when they can be identified directly or indirectly, in particular by means of assignment to an identifier such as a name, an identification number, location data, an online identifier (e.g. cookie) or one or more special features that express the physical, physiological, genetic, mental, economic, cultural or social identity of this natural person.

"Processing" means any process performed with or without the aid of automated procedures or any such process associated with personal data. The term is broad, and includes virtually every handling of data.

"Pseudonymisation" means the processing of personal data in such a way that it can no longer be attributed to a specific data subject without the need for additional information, provided that such additional information is kept separate and subject to technical and organisational measures to ensure that the personal data are not assigned to an identified or identifiable natural person.

"Profiling" means any kind of automated processing of personal data which involves the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects relating to job performance, economic situation, health, personal preferences, interests, reliability, behaviour, whereabouts or relocation of that natural person.

"Responsible body" means the natural or legal person, public authority or other body that decides, alone or in concert with others, on the purposes and means of processing personal data.

"Processor" means a natural or legal person, public authority, agency or other body that processes personal data on behalf of the responsible body.

MAJOR LEGAL BASES

In accordance with Art. 13 GDPR, we inform you about the legal basis of our data processing. Unless the legal basis is stated in the data policy, the following applies: The legal basis for obtaining consent is Art. 6 (1) a and Art. 7 GDPR; the legal basis for processing in the performance of our services and the performance of contractual measures, as well as the response to enquiries, is Art. 6 (1) b GDPR; the legal basis for processing in order to fulfil our

legal obligations is Art. 6 (1) c GDPR; and the legal basis for processing in order to safeguard our legitimate interests is Art. 6 (1) f GDPR. Art. 6 (1) d GDPR is the legal basis in the event that vital interests of the data subject or another natural person require the processing of personal data.

SECURITY MEASURES

We take appropriate technical measures in accordance with Art. 32 GDPR, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing, as well as the different likelihood and severity of the risk to the rights and freedoms of natural persons, and organisational measures to ensure a level of protection appropriate to the risk.

The measures include, in particular, ensuring the confidentiality, integrity and availability of data by controlling physical access to the data, as well as data access, input, transfer, availability and separation. We have also set up procedures to ensure the execution of data subject rights, data deletion and data vulnerability. Furthermore, we consider the protection of personal data already in the development and/or selection of hardware, software and procedures, according to the principle of data protection through technology design and privacy-friendly default settings (Art. 25 GDPR).

COOPERATION WITH EXTERNAL CONTRACTORS AND THIRD PARTIES

If, in the context of our processing, we disclose data to other persons and companies (external contractors or third parties), transmit data to them or otherwise grant access to the data, this will only be done on the basis of a legal permission (e.g. if transmission of data to third parties, such as payment service providers, is required pursuant to Art. 6 (1) b GDPR to fulfil the contract), if you have consented, if there is a legal obligation to do so or based on our legitimate interests (e.g. the use of agents, web hosts, etc.).

If we commission third parties to process data on the basis of a so-called "contract processing contract", this is done on the basis of Art. 28 GDPR.

TRANSMISSION TO THIRD COUNTRIES

If we process data in a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or in the context of the use of third party services or disclosures, or the transmission of data to third parties, this will only be done if it is to fulfil our (pre-) contractual obligations, on the basis of your consent, on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we process or have the data processed in a third country only under the special conditions of Art. 44 et seq. GDPR, i.e. the processing is done, for instance, on the basis of specific guarantees, such as the officially recognised level of EU data protection (e.g. for the US through the Privacy Shield) or in compliance with officially recognised special contractual obligations (so-called "standard contractual clauses").



RIGHTS OF DATA SUBJECTS

You have the right to ask for confirmation as to whether the data in question is being processed, and for information about this data, as well as for further information and a copy of the data in accordance with Art. 15 GDPR.

In accordance with Art. 16 GDPR, you have the right to demand the completion of data concerning you or the correction of incorrect data concerning you.

In accordance with Art. 17 GDPR, you have the right to demand that the relevant data be deleted immediately or, alternatively, to require a restriction of the processing of data in accordance with Art. 18 GDPR.

You have the right to demand receipt of the data relating to you provided to us in accordance with Art. 20 GDPR, and that it be transmitted to other responsible bodies.

In accordance with Art. 77 GDPR, you have the right to file a complaint with the competent supervisory authority.

RIGHT OF REVOCATION

You have the right to revoke your consent in accordance with Art. 7 (3) GDPR, with effect for the future.

RIGHT TO OBJECT

You may at any time object to the future processing of your data in accordance with Art. 21 GDPR. The objection may in particular be made against processing for direct marketing purposes.

COOKIES AND RIGHT TO OBJECT IN THE CASE OF DIRECT ADVERTISING

"Cookies" are small files that are stored on users' computers. Different information can be stored within the cookies. A cookie is primarily used to store information about a user (or the device on which the cookie is stored) during or after a visit to an online service. Temporary cookies / "session cookies" or "transient cookies", are cookies that are deleted after a user leaves an online service and closes the browser. In such cookies, the contents of a shopping cart in an online shop or a login status are saved, for example. Cookies that remain stored even after the browser has been closed are defined as "permanent" or "persistent" cookies. For example, the login status will be saved if users visit it after several days. Likewise, the interests of the users can be stored in such a cookie, which is used for range measurement or marketing purposes. A "third-party cookie" refers to cookies that are offered by providers other than the responsible body that manages the online service (otherwise, if it is only their cookies, this is called "first-party cookies").

We can use both temporary and permanent cookies, and clarify this in the context of our privacy policy.



If users do not want cookies stored on their computer, they will be asked to disable the option in their browser's system settings. Saved cookies can be deleted in the system settings of the browser. The exclusion of cookies can lead to functional restrictions of this online service.

General objection to the use of cookies for online marketing purposes can be stated for a variety of services, especially in the case of tracking, via the US website www.aboutads.info/choices/ or the EU website www.youronlinechoices.com. Furthermore, blocking the storage of cookies can be achieved by switching them off in the browser settings. Please note that not all features of the online service may be used.

DELETION OF DATA

The data processed by us are deleted or limited in their processing in accordance with Art. 17 and 18 GDPR. Unless explicitly stated in this privacy policy, the data stored by us are deleted as soon as they are no longer required for their purpose, and the deletion does not conflict with any statutory storage requirements. If the data are not deleted because they are required for other and legitimate purposes, their processing will be restricted, i.e. the data are blocked and not processed for other purposes. This applies, for example, for data that must be kept for commercial or tax reasons.

According to legal requirements in Germany, storage takes place in particular for 10 years according to §§ 147 (1) German Fiscal Code, 257 (1) No. 1 and 4 (4) German Commercial Code (books, records, management reports, accounting documents, trading books, documents relevant for taxation purposes, etc.) and 6 years pursuant to § 257 (1) No. 2 and 3, (4) German Commercial Code (commercial letters).

According to legal regulations in Austria, storage takes place in particular for 7 years according to § 132 (1) Austrian Fiscal Code (accounting documents, receipts/invoices, accounts, receipts, business papers, statement of income and expenses, etc.); for 22 years in connection with real estate; and for 10 years in the case of documents relating to electronically supplied services, telecommunications, broadcasting and television services provided to non-entrepreneurs in EU Member States, and for which the Mini-One-Stop-Shop (MOSS) is used.

CONTRACTUAL SERVICES

We process the data of our contractual partners and interested parties, as well as other clients, customers or contractual partners (uniformly referred to as "contractual partners") in accordance with Art. 6 (1) b GDPR in order to provide them with our contractual or pre-contractual services. The data processed, the nature, scope, purpose and necessity of their processing, are determined by the underlying contractual relationship.

The processed data include master data of our contractual partners (e.g., names and addresses), contact data (e.g. email addresses and telephone numbers) as well as contract data (e.g., services used, contract contents, contractual communication, names of contact



persons) and payment data (e.g., bank details, payment history).

In principle, we do not process special categories of personal data unless these components are the subject of commissioned or contractual processing.

We process data necessary for the establishment and fulfilment of contractual services, and point out the necessity of their submission, if this is not evident for the contractual partners. Disclosure to external persons or companies is only made if required by contract. When processing data provided to us within the framework of an order, we act in accordance with the instructions of the client as well as the legal requirements.

As part of our online services, we may save the IP address and the time of each user action. Storage is on the basis of our legitimate interests, as well as the interests of the user in protection against their misuse and other unauthorised uses. These data are not transferred to third parties unless required to pursue our claims acc. Art. 6 (1) f GDPR, or if there is a legal obligation to do so in accordance with Art. 6 (1) c GDPR.

The data are deleted if they are no longer required for the fulfilment of contractual or statutory duties of care, and for the handling of any warranty and comparable obligations, whereby the necessity of keeping the data is reviewed every three years; otherwise, the statutory storage obligations apply.

ADMINISTRATION, FINANCIAL ACCOUNTING, OFFICE ORGANISATION, CONTACT MANAGEMENT

We process data in the context of administrative tasks and the organisation of our business, financial accounting and in compliance with legal obligations, such as archiving. In doing so, we process the same data that we process in the course of rendering our contractual services. The processing principles are set out in Art. 6 (1) c GDPR and Art. 6 (1) f GDPR. The processing affects customers, interested parties, business partners and website visitors. The purpose and our interest in processing lies in administration, financial accounting, office organisation and data archiving, i.e. tasks that serve to maintain our business, perform our duties and provide our services. The deletion of the data in terms of contractual performance and contractual communication corresponds to the information provided in these processing activities.

We disclose or transmit data to financial authorities, consultants, such as tax accountants or auditors, and other fee agents and payment service providers.

Furthermore, based on our business interests, we store information about suppliers, promoters and other business partners, e.g. for later contact. We generally store this mainly company-related data permanently.

BUSINESS ANALYSIS AND MARKET RESEARCH

In order to operate our business profitably, to recognise market trends, wishes of the contractors and users, we analyse the data available to us for business transactions, contracts, enquiries, etc. We process stock data, communication data, contract data, payment data, usage data and metadata on the basis of Art. 6 (1) f GDPR, whereby the data subjects include contractual partners, interested parties, customers, visitors and users of our online service.

The analyses are carried out for the purpose of business analysis, marketing and market research. In doing so, we may take into consideration the profiles of registered users, including information, e.g. on services they have used. The analyses serve to increase our user-friendliness, the optimisation of our services and the profitability of our business. The analyses are for us alone, and are not disclosed externally unless they are anonymous, aggregated value analyses.

If these analyses or profiles are personal, they will be deleted or anonymised upon termination of the users, otherwise after two years from the conclusion of the contract. In addition, the overall business analyses and general trend provisions are generated anonymously, if possible.

CONTACT

When contacting us (for example, by contact form, email, telephone or via social media) user information is processed in order to process the contact request and its execution, in accordance with Art. 6 (1) b (in the context of contractual/pre-contractual relationships); Art. 6 (1) f (other requests) GDPR. User information can be stored in a Customer Relationship Management System ("CRM System") or similar contact request organisation system.

We delete the requests if they are no longer required. We check the requirement every two years; furthermore, legal archiving obligations apply.

NEWSLETTERS

Below, we inform you about the contents of our newsletters as well as the registration, dispatch and statistical evaluation procedures and your right to object. By subscribing to our newsletters, you agree to the receipt and the procedures described.

Newsletter content: We send newsletters, emails and other electronic notifications with advertising information (hereinafter "newsletters") only with the consent of the recipient or legal permission. Insofar as the contents of a newsletter are clearly described during registration, these are decisive for the consent of the users. Additionally, our newsletters contain information about our services and ourselves.

Double opt-in and logging: Registration for our newsletters is done via a so-called double-opt-in procedure, i.e. after registration, you will receive an email asking you to confirm your



registration. This confirmation is necessary so that nobody can register with external email addresses. Registration for the newsletters will be logged in order to evidence the registration process according to legal requirements. This includes storage of the login and confirmation time, as well as the IP address. Likewise, changes to your data stored with the shipping service provider will also be logged.

Login details: It is sufficient to provide your email address to subscribe to the newsletter. Alternatively, we ask you to give a name in the newsletter for personal address.

The dispatch of the newsletter and the associated performance measurement are on the basis of the recipient's consent acc. Art. 6 (1) a; Art. 7 GDPR in combination with § 7 (2) No. 3 German Unfair Competition Law or, if consent is not required, on the basis of our legitimate interests in direct marketing acc. Art. 6 (1) f GDPR in combination with. § 7 (3) German Unfair Competition Law.

Logging of the registration process is based on our legitimate interests in accordance with Art. 6 (1) f GDPR. Our interest lies in the use of a user-friendly and secure newsletter system, which serves both our business interests and the expectations of the users, and also allows us to prove consent.

Termination/revocation - you may terminate the receipt of our newsletter at any time, i.e. revoke your consent. A link to cancel the newsletter can be found at the end of each newsletter. We may save the submitted email addresses for up to three years based on our legitimate interests before we delete them to provide evidence of prior consent. The processing of this data is limited to the purpose of a possible defence against claims. Individual requests for cancellation are possible at any time, provided that at the same time the former existence of a consent is confirmed.

GOOGLE ANALYTICS

Based on our legitimate interests (i.e., interest in the analysis, optimisation and economic operation of our online service within the meaning of Art. 6 (1) f GDPR), we use Google Analytics, a web analytics service provided by Google LLC ("Google"). Google uses cookies. The information generated by the cookie about the use of the online services by users is usually transmitted to a Google server in the USA and stored there.

Google is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation.

Google will use this information on our behalf to evaluate the use of our online services by users, to compile reports on the activities within this online service and to provide us with further services related to the use of this online service and internet usage. In this case, pseudonymous usage profiles can be generated for users from the processed data.

We only use Google Analytics with activated IP anonymisation. This means that the IP address of the user will be shortened by Google within member states of the European



Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the US and shortened there.

The IP address submitted by the user's browser will not be merged with other Google data. Users can prevent the storage of cookies by setting their browser software accordingly; users may also prevent the collection by Google of the data generated by the cookie and related to their use of the online service and the processing of such data by Google by downloading and installing the browser plug-in available.

For more information about Google's data usage, settings and objection options, please read Google's Privacy Policy as well as in the Google's ad display settings.

Users' personal data will be deleted or anonymised after 14 months.

ONLINE PRESENCE IN SOCIAL MEDIA

We maintain an online presence within social networks and platforms in order to communicate with customers, interested parties and users active there, and to inform them about our services. When accessing the respective networks and platforms, the terms and conditions and the data processing guidelines of their respective operators apply.

Unless otherwise stated in our Privacy Policy, we process users' data as long as they communicate with us within social networks and platforms, e.g. write posts on our online presence or send us messages.

INTEGRATION OF SERVICES AND THIRD PARTY CONTENT

On the basis of our legitimate interests (i.e. in the analysis, optimisation and profitable operation of our online service within the meaning of Art. 6 (1) f GDPR), we make use of content or services offered by third-party providers in order to provide their content and services, such as videos or fonts (collectively referred to as "content").

This always presupposes that the third-party providers of this content perceive the IP address of the users, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of this content. We endeavour to use only content whose respective providers use the IP address solely for the delivery of the content. Third parties may also use so-called pixel tags (invisible graphics, also referred to as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device, and may include, but is not limited to, technical information about the browser and operating system, referring web pages, visit times and other information regarding the use of our online services, as well as being linked with such information from other sources.