PRIVACY POLICY

TFE hotels

Introduction

For the purposes of applicable data protection and privacy laws, Adina Germany Holding GmbH & Co. KG (“Adina“, “us“, “we“), with its registered offices at Leipziger Straße 124, 10117 Berlin, info@adina.eu is considered the “Data Controller” in respect of the Personal Data that it collects, uses and manages on its website in accordance with this Privacy Policy (“Policy”). Adina takes the protection of your Personal Data very seriously. We are committed to protecting all Personal Data provided to us, whether by our customers, other individuals with whom we do business, visitors to and users of our websites or otherwise. Personal Data is information which relates to an identified or identifiable living individual.

This Policy explains what Personal Data we collect, how we may use and manage it and the rights you have in relation to your Personal Data. Before you provide us with any Personal Data or browse our website, you should read through this Policy in full and make sure that you are comfortable with our privacy practices. For an explanation of the defined terms used in this Policy, please see the glossary at the end.

Who is responsible for data processing and whom can I contact?

The data controller is:

Adina Germany Holding GmbH & Co. KG
Leipziger Straße 124
10117 Berlin

Telefon: +49 30 863 298-500
E-Mail: info@adina.eu

You can contact our company Data Protection Officer at:

HYAZINTH Consulting for Tech UG
(haftungsbeschränkt)
Lennéstraße 1
10785 Berlin

Telefon: +49 30 88 060 910
Telefax: +49 30 88 060 919

E-Mail: info@hdrcontrol.de

In our group of companies, the respective company operating the hotel or other accommodation which you are a guest of will act as a further data controller (a so-called joint controller). You can assert your claims as a data subject against both of these parties at your discretion.

You can reach our company’s data protection officer at the abovementioned contact details or at: **info@hdrcontrol.de.**

Whose Personal Data do we collect?

We collect Personal Data from a range of individuals including from:

- guests in our hotels and apartments (including future and past guests);
- representatives of our suppliers and other business contacts;
- contractors;
- users of our website;
- individuals who contact us by any means.

How we collect your Personal Data?

We obtain Personal Data which you knowingly and voluntarily disclose to us. We collect Personal Data when you:

We may also collect information received by us from third party sources, for example relating to your use of other websites which we operate and from related third parties such as sub-contractors.

What Personal Data we collect

We may collect a range of Personal Data from you in the context of our business activities on our website (e.g. when you book a room with us), such as:

- your name;
- email address, home address, telephone number and other contact details;
- photographic identification;
- financial and payment information (for room reservations);
- your arrival and departure dates and any preferences or special requests for your stay with us; and
- communications with you (including comments that you may provide to us during or after a stay in one of our hotels or apartments).

In addition, when you use our website, we collect certain standard information that is sent by your browser to our website. This includes technical information, such as your IP address, browser type, operating system, language, time zone setting, access times and any referring website addresses. We also process data which are collected by our analytics & tracking tool as well as social media providers. All providers process these data within the framework of strict contractual provisions guaranteeing the security of your data. If you would like to learn more about the use such technologies, please refer to the "Cookies" section below or the overview on "Web Analytics, Tracking and other Third-Party Tools on www.adinahotels.com" at the end of this Policy.

The purposes for which we process your Personal Data

- to provide you with our newsletter and other information about our apartments, hotels and other services at your request;
- to notify you of any changes to our services and to provide you with information in relation to similar goods and services that may be of interest;
- to manage your room reservations and accommodation requests;
- to communicate with you and third party contacts;
- to administer our website and help improve our hotels and other service offerings;
- to manage, analyse and respond to customer feedback (including complaints);
- to carry out analytics in relation to the use of our website;
- to comply with applicable laws and regulations.

The legal basis for processing your Personal Data

Under applicable data protection laws we are obliged to disclose to you the legal basis we rely on when processing your Personal Data. Under the EU General Data Protection Regulation (GDPR) there are a number of legal provisions permitting us to process the Personal Data described in this Policy. In pursuing the processing purposes mentioned above, the legal basis for the processing of your Personal Data will be one of the following:

- Your consent (e.g. regarding the use of tracking tools or following your newsletter registration)
- the performance of a contract we have executed with you or a third person (when you book a room with us)
- the legitimate business interests of Adina or third parties (e.g. when processing usage data in server logs) or
- compliance with legal provision (where we are legally obliged to retain certain data or disclose it to public authorities).

Who we share your Personal Data with

Adina may share your Personal Data with people within the company and the wider TFE Hotels Group who have a "need to know" that data for business or legal reasons, for example, in order to carry out an administrative function such as processing reservations and invoices, or to direct a query that you have submitted to the relevant department within Adina.

We may disclose your Personal Data to third parties including the authorities, our advisors, suppliers of IT services and third parties engaged by us for the purpose of providing our website and related services; to protect any intellectual property rights in any materials displayed on or otherwise available from Adina's website; for the purposes of seeking legal or other professional advice; to respond to a legal request or comply with a legal obligation; or to enforce our website Terms and Conditions.

All data recipients are required to maintain the confidentiality of your data and are restricted from using it for any purpose other than the purposes set out in this Policy.

We may decide to allow users to share comments, postings, testimonials, or other information. If you choose to submit such information to us, the information that you submit may be available generally to the public. Information that you provide in these areas may be read, collected, and used by others who access them.

Transfers of Personal Data

Please note that any recipient to whom we may disclose your Personal Data under this Policy may be situated in a country other than your own and that such country may provide a lower level of data protection requirements than your own country. However, we will ensure an adequate level of protection for your data at any point in time.

Whenever we transfer Personal Data across borders, we take legally required steps to ensure that aproppriate safeguards are in place to protect your Personal Data and to make sure it is treated in accordance with this Policy. Such appropriate safeguards we will provide, without limitation, by way of standard contractual clauses, binding corporate rule or approved codes of conduct.

Security

Adina takes all reasonable technical and organisational security measures to protect Personal Data from accidental or unlawful destruction, accidental loss and unauthorised access, destruction, misuse, modification or disclosure. To protect your security when processing payments (for example as part of the room reservation process), all payment transactions on our website are made through encrypted SSL or TLS connections.

Records retention

Your Personal Data is not kept for longer than is necessary for the purposes for which it is collected. This means that data and records (including Personal Data) are destroyed or erased from our systems when no longer required. The amount of time that records are kept for varies depending upon the type of Personal Data they contain.

Your rights

The GDPR gives you the right to:

- request access to as well as a copy of the Personal Data that we hold about you; or
- request that we rectify, delete, or limit the processing of your Personal Data,
- object to the processing of your Personal Data for reasons arising out of your particular situation,
- lodge a complaint with a data protection supervisory authority if you think we have violated the GDPR Please submit your written request to our company by mailing to info@adina.eu.

If you decide that you do not want to receive commercial communications from us, whether by email, telephone, messaging app or post, you can "opt-out" from receiving such communications at any time by clicking on the "un-subscribe" or "opt out" link provided at the bottom of each such communication and updating your preferences, or by contacting us at **info@adina.eu.**

Third Party Links

Please note that our website may contain links to other websites, including plugins for various social media platforms and services. These third party sites are not subject to this Policy and we recommend that you check the privacy and security policies of each website that you visit. We are only responsible for the privacy and security of the data that we collect and have no control over the actions of any third parties in relation to your data.

Changes to this Policy

We reserve the right to modify or amend this Policy at any time by posting the revised Policy on our website. It is your responsibility to review the Policy from time to time.

Cookies

Our websites use cookies to improve your user experience. Adina uses "cookies" to help enhance your experience on the websites. Cookies are pieces of information that a website transfers to your computer's hard disk for record-keeping purposes. Most web browsers are set to accept cookies as the default. However, if you do not wish to receive any cookies you may set your browser to refuse cookies. If you turn off cookies we cannot, for example, fill out forms automatically with details you have previously given us.

The use of cookies can enhance your experience on the Adina website, by remembering information that you have previously given to us. They can make it easier for you to fill out forms, book online and can ensure that information provided to you is most relevant to your interests. Cookies can also provide us with information on how our customers use our websites so that we can continually improve the design of the websites. Cookies themselves do not contain personal information about you. They simply operate as a unique identifier which helps us to know what our customers find interesting and useful on our websites, almost like a continuing questionnaire. Adina does not store any personal information inside cookies, although the cookie may identify the user's browser.

Your feedback

We think it is very important to hear what you have to say about our policies. If you have any feedback about this Policy, please Email us at info@adina.eu.

Glossary

Data Controller
A party that determines the purposes and means of data processing.

Data Protection Authority

The relevant supervisory authority with responsibility for privacy or data protection matters in the jurisdiction of Adina and/or a TFE Hotels Group Company; European Economic Area (EEA).

European Economic Area (EEA)
The EEA includes all European Union member states and Iceland, Liechtenstein and Norway.

Personal Data
Information which relates to an identified or identifiable individual (i.e. data about Adina employees, contractors, applicants, employees of vendors and suppliers, contractors and customers using our hotel and apartment services and individuals who use our website). It includes names, addresses, email addresses, job applications, user account information, and correspondence. Personal Data can also include web browsing information (e.g. data associated with a particular cookie) and IP addresses, when such information can be linked to an individual.

Processing
Any activity relating to Personal Data; this includes (without limitation) collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, and even deleting it.

Web Analytics, Tracking and other Third-Party Tools on www.adinahotels.com

We use cookies and similar technologies for the automatic processing of usage data on the website. We generally cannot use this data to identify you as a person but will only receive aggregated reports and pseudonymized information. In addition, as explained below, we use web beacons which are small graphic images (also known as "pixel tags" or "clear GIFs") on our Platform. They are used together with cookies to track user behavior on the website. The legal basis for the processing of personal data using cookies and other technologies is your consent which you have granted us through our consent banner tool available when you first visit our website. You can withdraw your consent at any time by using the consent manager.

Google Analytics

The website uses Google Analytics, a service provided by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland ("Google Ireland"), a subsidiary of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043 ("Google"). Google Analytics uses cookies and helps us to analyse the number of users and the general behaviour of visitors to the website.

The information generated by the cookie about your use of the website (identifier, browser type/version, operating system used, referrer URL, shortened IP address, time of server request) is generally transmitted to a Google server in the U.S. and stored there. However, in the Member States of the European Union or in other signatory states to the Agreement on the European Economic Area, your IP address will initially be truncated by Google on the website. For this purpose, we have implemented the code "gat._anonymizeIp() ;" in order to ensure anonymous collection of IP addresses (so-called IP masking).

Only in exceptional cases is the complete IP address transmitted to a Google server in the USA and abbreviated there. If, exceptionally, personal data is transferred to the USA, Google ensures a level of data protection corresponding to the data protection level in the EU by way of accepting strict data protection terms under the EU standard contractual clauses.

Google will use the information about your use of the Website on our behalf in the context of Google Analytics to evaluate your use of the Website, to compile reports on Website activity and to provide other services relating to Website activity and internet usage. The IP address transmitted by your browser in the context of Google Analytics and Google Tag Manager is not combined with other data from Google by us. In addition to generally de-activating cookies, you can prevent Google from collecting and processing data about your use of the website (including your abbreviated IP address) by downloading and installing the browser plug-in at the following link: http://tools.google.com/dlpage/gaoptout. Further information on the terms of use and data protection can be found at http://www.google.com/analytics/terms/de.html and https://www.google.de/intl/de/policies/privacy/.

Google Analytics Advertising Functions and Google Ads

We also use Google Ads to advertise on the websites of third parties. In relation to the data of the advertising campaigns, we can determine how suc-cessful the individual advertising measures are. This serves to pursue our interest in delivering to you advertisements which are of interest to you and to make the offering on the website more interesting for you. Google uses so-called "ad servers" for this purpose, through which our ads are delivered. For this purpose, we use ad server cookies, which can be used to measure certain parameters such as the display of ads or clicks by users.

If you access the website via a Google advertisement, Google Ads stores a cookie on your device. These cookies lose their validity after 30 days and cannot be used by us to identify you personally. The unique cookie ID, number of ad impressions per placement (frequency), last impression (relevant for post-view conversions) and opt-out information (marking that the user no longer wishes to be addressed) are usually stored as analysis values for this cookie.

These cookies will enable Google to recognize your Internet browser for advertising purposes. If a user visits certain pages of an AdWords customer's Website and the cookie stored on his or her computer has not yet expired, Google can track whether the user clicked on the ad and was directed to that page. Each Adwords customer is assigned a different cookie. Cookies cannot therefore be traced via the Websites of Adwords customers. We

can never personally identify you with the information we collect and only receive aggregated reports about user behavior. On the basis of these evaluations, we can identify which of the advertising measures used are particularly effective. We do not receive any further data from the use of the advertising media, in particular we cannot identify the users on the basis of this information. You can also opt out of participating in this tracking process via Google's preferences at **https://www.google.de/settings/ads**, or as part of the About Ads self-regulatory campaign via the link **http://www.aboutads.info/** choices, where this setting will be deleted if you delete your cookies. You can also disable it in your browser by installing a plug-in if you click on the following link **http://www.google.com/settings/ads/plug-in**. Further information on data processing within the framework of Google Ads can be found at **https://policies.google.com/technologies/ads?hl=en** and **https://www.google.de/intl/de/policies/privacy/**.

Google Maps & Google reCAPTCHA

Via an API, the website uses the mapping service Google Maps. To enable the use of the Google Maps features, your IP address must be processed by Google. We and Google are jointly responsible for this processing. As a rule, this information is transferred to one of Google's servers in the United States, where it is archived. The operator of this website has no control over this data transfer. However, you can deactivate the use of your location data at any point in time by changing the settings of your devices. You will be prompted to activate the use of location data on the website before any data are transmitted to Google. We use Google Maps to present our online content in an appealing manner and to make the locations disclosed on the website easy to find.

The purpose of reCAPTCHA is to determine whether data entered on the website (e.g. information entered into a contact form) is being provided by a human user or by an automated program. To determine this, reCAPTCHA analyses the behaviour of the website visitors based on a variety of parameters. This analysis is triggered automatically as soon as the website visitor enters the site. For this analysis, reCAPTCHA evaluates a variety of data (e.g. IP address, time the website visitor spent on the site or cursor movements initiated by the user). The data tracked during such analyses are forwarded to Google. reCAPTCHA analyses run entirely in the background. Website visitors are not alerted that an analysis is underway. It is in our legitimate interest to protect the website against misuse by automated industrial espionage systems and against SPAM. For more information about Google reCAPTCHA please review the information at and **https://www.google.com/recaptcha/intro/android.html**.

Facebook Plug-ins

The Facebook plug-in "Like Button" and pixel tag are installed on the website. An overview of the Facebook plug-ins can be found here: **http://develo-pers.facebook.com/docs/plug-ins/**. These are services provided by Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook EU") with its registered seat in the EEA.

When you visit the website, a direct connection is established between your device and the Facebook server. Facebook receives information that you have visited the website, including your IP address. If you click the "Like" button in your Facebook account, you can link the content of the website to your Facebook profile. In this way, Facebook can connect the visit with the visitor and use it to advertise on Facebook according to the interests of the visitor.

The tracking pixel transmits to Facebook your IP address and other information when you use the website, including device information (operating system, hardware version, device settings, file and software names and types, battery and signal strength), device identifiers, device locations, including specific geographic locations such as GPS, Bluetooth or WiFi signals, connection information such as the name of your mobile operator or ISP, brow-ser type, language and time zone, mobile phone number) and information about your activities. When you later sign into Facebook, an irrevocable, non-personal checksum (profile) of your Usage Data is sent to Facebook for analysis and marketing purposes.

For more information, see Facebook's Privacy Statement at **http://de-de.facebook.com/policy.php and https://www.facebook.com/business/help/651294705016616**. If you do not want Facebook to associate your visit to the website with your Facebook account, please log out of your Face-book account. Further settings and objections to the use of the data for advertising purposes are possible within the Facebook profile settings: **https:// www.facebook.com/settings?tab=ads**. You can also completely prevent the loading of Facebook plug-ins with add-ons for your browser, e.g. with the „Facebook Blocker".

Facebook Connect

Instead of registering directly on the website, you also have the option to register using Facebook Connect. If you decide to register via Facebook Connect and click on the "Login with Facebook" / "Connect with Facebook" button, you will be automatically connected to the Facebook platform. There, you can log in using your username and password. As a result, your Facebook profile will be linked to the website or our services. This link gives us access to the data you have already transmitted to Facebook. These data can comprise the following: Facebook name, Facebook profile photo and cover photo, Facebook cover photo, Email address archived with Facebook Facebook-ID, Facebook friends lists, Facebook Likes ("Likes" information), Date of birth, Gender, Country, Language. This information will be used to set up, provide and customise your account. The data for your registration via Facebook Connect will be processed on the basis of your consent. You may revoke this consent at any time with future effect

Use of LinkedIn Plug-in

The website uses functions of the network LinkedIn. The provider is LinkedIn Ireland Unlimited Company, Wilton Plaza, Gardner House 4,5,6, 2 Dublin, Irland („LinkedIn"). Each time you visit one of the websites, a connection is established to LinkedIn servers. LinkedIn will be informed that you have visi-ted the website with your IP address. If you click the LinkedIn "Recommend" button and are logged into your LinkedIn account, LinkedIn will be able to associate your visit to the website with you and your user account. Thus, LinkedIn can place targeted advertising and content on the LinkedIn platform for you. For more information, please see LinkedIn's Privacy Statement at: **https://www.linkedin.com/legal/privacy-policy**. If you wish to object to the processing of your data by LinkedIn, you can do so here: **https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out**.

Use of Twitter

If you have a Twitter account, we may use a cookie from Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland, with your permission, ("Twitter") to track your user behavior if you have reached the website through an advertisement placed by us on Twitter. In this case, Twitter places a cookie on your computer, through which we as a Twitter customer and Twitter can recognize that you have visited the website by clicking on a Twitter ad.

The information obtained by the tracking cookie is transmitted to us under a pseudonym and does not give us any information about the person of the user. They serve for statistical purposes, but are connected to your Twitter account by Twitter in accordance with its data protection guidelines

(available at **https://twitter.com/privacy?lang=en**), stored and used for our own advertising purposes, whereby your data may also be transmitted to Twitter's partners. If you wish to avoid the storage and use of your data by Twitter to the extent described above, you can do so by configuring the Twitter settings for advertisements at **https://help.twitter.com/en/safety-and-security/privacy-controls-for-tailored-ads** accordingly. For more information about Twitter's privacy policy, please refer to the related privacy policy at **https://twitter.com/privacy?lang=en**.

Our Social Media Pages

We maintain publicly available profiles in social networks. This includes pages on Facebook and Instagram. We and Facebook Ireland Ltd („Facebook") are jointly responsible as controllers for the data processing on our Social Media Pages. For this purpose, we have entered into a joint controllership agreement with Facebook which is available for review here. Detailed explanations on the data processing by Facebook are available in the Facebook Data Policy.

Data subject rights can be asserted both against us and Facebook. We would also like to point out that Facebook uses cookies which are also used within the framework of our social media pages made available on Facebook's platforms. For technical reasons, we have no influence on the use of these cookies and cannot prevent their use. We cannot draw any conclusions about specific persons from the data transmitted to us by Facebook; instead, we only receive aggregated data on the use of our Social Media Pages within the framework of „Facebook Insights".

To this end, Facebook's Cookies & Other Storage Technologies notice (where detailed additional information about individual cookies and their lifetime is also available) state that Facebook uses cookies when providing the Facebook products (including our own Facebook page) for the following purposes: „advertising, recommendations, insights and measurements". Facebook thus uses cookies as a tool to show and make recommendations to users who may be interested in the products, services or charities highlighted by companies and other organisations. Facebook also uses cookies to help companies using Facebook products measure the success of their advertising campaigns.

The data on our social media pages are processed on the basis of Article 6 (1) f) GDPR to pursue our legitimate interests by staying in touch with potential clients and other parties interested in our services.