

# Privacy Information for Guests



Information on how we process your data and your rights under the EU General Data Protection Regulation (GDPR)

Dear customer, dear client,

Below, we inform you about the processing of your personal data by us and the statutory rights you are entitled to under data protection laws. If you wish to obtain information on data processing within on our website, you can do so by accessing our Privacy Policy: <https://www.adinahotels.com/privacy-policy>

Exactly which data is processed specifically and how it is used will depend, for the most part, on the services you have booked.

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

### The data controller is:

Adina Germany Holding GmbH & Co. KG  
Leipziger Straße 124  
D-10117 Berlin, Germany  
Phone: +49 30 863 298-500  
Email: [info@adina.eu](mailto:info@adina.eu)

### You can contact our company Data Protection Officer at:

HYAZINTH Consulting for Tech UG (haftungsbeschränkt)  
Lennéstraße 1  
D-10785 Berlin  
Phone: +49 30 88 060 910  
Fax: +49 30 88 060 919  
Email: [info@hdrcontrol.de](mailto: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](mailto:info@hdrcontrol.de).

## 2. What are our data sources and which data do we use?

As a hospitality business, we only process personal data that we receive from you within the scope of our business relationship. In addition, we process – as far as this is necessary for the provision of our services – personal data that we have received from other companies (e.g. credit bureaus) in accordance with applicable law (e.g. for the execution of orders/bookings, for the fulfilment of contracts or on the basis of a declaration of consent obtained from you).

Personal data processed by us include personal details (name, address and other contact details, date and place of birth and nationality) as well as legitimization data (e.g. identity card details). In addition, we also process order data (e.g. reservation data), data from the fulfilment of our contractual obligations (e.g. accommodation contract), information about your financial situation (e.g. credit-worthiness data), if applicable, as well as advertising and sales data (e.g. about your interest in marketing newsletters and your interaction with marketing emails).

## 3. What are the processing purposes and what is the legal basis?

We process personal data in accordance with the GDPR and the Federal Data Protection Act (BDSG):

### 3.1 To fulfil contractual obligations (Article 6 (1) lit. b) GDPR)

The processing of personal data (Article 4 No. 2 GDPR) is carried out for the purpose of providing and procuring our services, in particular for the performance of our contracts or pre-contractual measures with you and the execution of your bookings and orders, as well as all activities required for the operation and administration of our business.

The purposes of the data processing are primarily related to the specific booking or order (e.g. the reservation and provision of rooms) and may include, inter alia, resource planning, advice and transaction processing.

Further details regarding the purpose of data processing can be found in the respective contract documents and terms and conditions.

### 3.2 To pursue our legitimate interests (Article 6 (1) lit. f) GDPR)

As far as necessary, we process your data beyond the actual performance of the contract in order to protect the legitimate interests of our business or third parties, specifically for:

- Ensuring IT security and IT operation;
- Testing and optimization of procedures for demand analysis and direct customer contact;
- Advertising or market and opinion research, as long as they have not objected to the use of your data;
- The assertion of legal claims and defence in legal disputes;
- Measures for building security (e.g. access controls);
- Measures to ensure our rights as a property owner (e.g. on-site video surveillance);
- Measures for business management and further development of services and products;
- Consultation of and data exchange with credit agencies (e.g. SCHUFA) to determine creditworthiness or default risks;
- Prevention and investigation of criminal offences.

### 3.3 Based on your consent (Article 6 (1) lit. a) GDPR)

If you have given us your consent to process personal data for specific purposes (e.g. forwarding of data to credit agencies and credit protection associations, evaluation of user data for marketing purposes), accordingly, this processing is based on your consent. A given consent can be revoked at any time. Please note that the revocation is only effective with future effect. Processing that took place before the revocation is not affected.

### 3.4 Due to legal requirements (Article 6 (1) lit. c) GDPR)

Furthermore, as a hotel we are subject to various legal obligations, i.e. legal requirements (e.g. by registration law). The purposes of the processing include, among other things, identity checks and the reporting obligations arising from statutory law. According to § 30 of the Federal Registration Act ("Bundesmeldegesetz"), we are obliged to prepare a registration form for each guest and to present this to the responsible authorities on request. The details of these data can be found on the registration form you have filled out.

### 4. To whom is my data transferred?

Within our company, only those departments that need access to your data in order to fulfil our contractual and legal obligations are granted access. Processors commissioned by us (Article 28 GDPR) may also receive data for the abovementioned purposes. These are companies in the categories of IT services, logistics, printing services, telecommunications, debt collection, consulting and advisory services as well as sales and marketing.

With regard to the passing on of data to recipients outside our company, it should be noted that we only pass on information about you if required by law, if you have given your consent or if we are authorised to provide information.

Under these conditions, recipients of personal data may be, for example

- Public bodies and institutions (e.g. authorities) in the event of a legal or official obligation.
- Other institutions to which we transfer personal data for the purpose of conducting business with you (e.g. credit agencies).

Other data recipients may be those entities for which you have given us your consent to transfer data.

### 5. How long will my data be stored?

As far as necessary, we process and store your personal data for the duration of our business relationship, which also includes, for example, the initiation and execution of a contract.

In addition, we are subject to various retention obligations arising from the German Commercial Code (HGB) and the German Fiscal Code (AO). The periods of retention or documentation stipulated there are two to ten years.

Finally, the retention period is also assessed according to the statutory limitation periods, which, for example, according to §§ 195 et seq. of the German Civil Code (BGB), can generally be three years, but in certain cases can be up to thirty years.

### 6. Is data transferred to a third country or to an international organisation?

We are part of the TFE Hotels Group. As a result, data may be transferred to Medina Property Services Pty Ltd. in Australia on a case-by-case basis (e.g. to process invoices or check aggregated booking data). For these transfers we will always ensure an adequate level of data protection by incorporating the EU standard contractual clauses into our data transfer agreements. Otherwise, data will only be transferred to third countries (countries outside the European Economic Area – EEA) if this is necessary to execute your orders, if it is required by law or if you have given us your consent.

### 7. Which data subject rights do I have?

Every data subject has the right of access under Article 15 GDPR, the right of rectification under Article 16 GDPR, the right of deletion under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR and the right to data portability under Article 20 GDPR. In the case of the right of information and the right of deletion, the restrictions under Articles 34 and 35 BDSG apply. In addition, there is a right to lodge a complaint with a data protection supervisory authority (Article 77 GDPR in conjunction with Article 19 BDSG). If you wish to exercise these rights, please contact [info@adina.eu](mailto:info@adina.eu)

### 8. Is there an obligation to provide data?

Within the scope of our business relationship, you only need to provide us with those personal data that are necessary for the establishment, execution and termination of a business relationship or that we are legally obliged to collect. Without this data, we will generally have to refuse to conclude the contract or execute the order or will not be able to execute an existing contract and may have to terminate it.

### 9. To what extent is there automated decision making in individual cases?

We do not use fully automated decision making or profiling in accordance with Article 22 GDPR to establish and conduct the business relationship.

## Information about your right of objection according to Article 21 GDPR

1. You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data relating to you on the basis of Article 6 (1) lit. f) GDPR (data processing based on a balancing of interests); this also applies to profiling within the meaning of Article 4 No. 4 GDPR based on this provision.

If you object, we will no longer process your personal data unless we can prove compelling reasons for processing that are worthy of protection and outweigh your interests, rights and freedoms, or unless the processing serves to assert, exercise or defend legal claims.

2. In individual cases, we process your personal data in order to carry out direct advertising. You have the right to object, at any time and without giving reasons, to the processing of personal data concerning you for the purposes of such direct marketing, including profiling, where it is linked to such direct marketing.

If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes.

**The objection can be made through any communication channel and should be addressed to:**

Adina Germany Holding GmbH & Co. KG  
Leipziger Straße 124  
D-10117 Berlin, Germany  
Email: [info@adina.eu](mailto:info@adina.eu)