

Information on data processing

according to Artt. 13, 14 GDPR



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www.sanahotels.com

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Introduction

We are pleased that you are visiting our homepage and thank you for your interest in our hotel and the hotel group. Dealing with the data of our guests, customers and interested parties is a matter of trust. The trust placed in us is very important to us and therefore the significance and obligation to handle your data with care and to protect it from misuse.

To ensure that you feel safe and comfortable when visiting our website, we take the protection of your personal data and its confidential treatment very seriously. Therefore, we act in accordance with the applicable legal provisions on the protection of personal data and data security. With these notes on data protection, we would therefore like to inform you about when we store which data and how we use it - naturally in compliance with the applicable legislation.

The SANA Berlin Hotel specifically follows the EU General Data Protection Regulation and the current Federal Data Protection Act (BDSG). When using the internet, we follow the Telemedia Act (TMG) and the Telecommunications Telemedia Data Protection Act (TTDSG) of the Federal Republic of Germany to protect your personal data. In the following, we explain what information we collect during your visit to our websites and how it is used.

Name and address of the person responsible

The responsible person within the meaning of the GDPR and other national data protection laws of the member states as well as other data protection regulations is:

SANA Berlin Hotel GmbH

Nürnberger Strasse 33/34 D-10777 Berlin

Tel.: +49 (0) 30 2005 1510 Fax: +49 (0) 30 2005 1519

Mail: sanahotels.com

Name and address of the data protection officer

Mr Andreas Thurmann

DataSolution LUD GmbH Isarstrasse 13 D-14974 Ludwigsfelde

Mail: mail@hoteldatenschutz.de

General information on data processing

Scope of the processing of personal data

As a matter of principle, we collect and use personal data of our users only insofar as this is necessary for the provision of a functional website as well as our contents and services. The collection and use of our users' personal data regularly takes place only with the user's consent. An exception applies in cases where it is not possible to obtain prior consent for actual reasons and the processing of the data is permitted by legal regulations.

Legal basis for the processing of personal data

Insofar as we obtain the **consent of the data subject for** processing operations of personal data, Art. 6 (1) a) GDPR serves as the legal basis. When processing personal data that is necessary for the **performance of a contract** to which the data subject is a party, Art. 6 (1) (b) GDPR serves as the legal basis. This also applies to processing operations that are necessary for the performance of pre-contractual measures. If processing of personal data is necessary to **comply with a legal obligation** (statutory provisions) to which our company is subject (e.g. federal registration laws), Art. 6 (1) c) GDPR serves as the legal basis. If the processing is necessary to **protect a legitimate interest of** our company or a third party and the interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, Art. 6 (1) f) GDPR serves as the legal basis for the processing.

Data deletion and storage period

The personal data of the data subject shall be deleted or blocked as soon as the purpose of the storage no longer applies. Storage may also take place if this has been provided for by the European or national legislator in Union regulations, laws or other provisions to which the person responsible is subject. The data will also be blocked or deleted if a storage period prescribed by the aforementioned standards expires, unless there is a necessity for the continued storage of the data for the conclusion or fulfilment of a contract.

Contact form/e-mail contact

Description and scope of data processing

If there is a contact form on our website, it can be used for electronic contact. If you make use of this option, the data entered in the input mask will be transmitted to us and stored. These data are: First name and surname, e-mail address and the request.

Alternatively, it is possible to contact us via the e-mail addresses provided. In this case, the personal data transmitted with the e-mail will be stored.

Legal basis for data processing

The legal basis for the processing of the data is firstly our legitimate interest in the processing of data in the context of contacting the enquirer. If the contact is aimed at the conclusion of a contract, the additional legal basis for processing is in the context of a contract initiation relationship or contract relationship.

Purpose of the data processing

The processing of the personal data from the input mask serves us solely to process the contact.

The other personal data processed during the submission process serve to prevent misuse of the contact form and to ensure the security of our information technology systems.

Duration of storage

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. For personal data sent by e-mail, this is the case when the respective conversation with the user has ended. The conversation is ended when the circumstances indicate that the matter in question has been conclusively clarified.

If the contact is a pre-contractual relationship (offer or reservation enquiry), the transmitted data will also be stored in our hotel or event software and used to execute the contract. If there is no contractual relationship, we delete the data after one year at the end of the year.

Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address <u>datenschutz@sanahotels.com</u> for this purpose. We would like to point out that in the event of an objection, the conversation cannot be continued or we cannot create any offers etc.. All personal data stored in the course of contacting you will be deleted in this case.

Collection, processing and use of personal data at SANA Hotels

Description and scope of data processing

The object of the hotel group is the operation of several hotels in Portugal, Germany and Angola with joint responsibility. The collection, processing and use of data is carried out for the exercise of the purpose listed.

Hotels, guesthouses and other accommodation establishments are allowed to collect personal data of their guests and store it in automated procedures as far as this is necessary within the framework of the accommodation contract. This usually includes billing data on food and beverages, telephone calls made from the room and / or other hotel specific services. Hotels and accommodation providers are obliged by national registration regulations to ask for guest details such as first and last name, date of birth, place of residence and nationality.

SANA Hotels Portugal, S.A., Cais das Naus, Lote 2.15.02, 1990-173 Lisboa, Portugal is the responsible entity for the execution of the central reservations. To increase our services, we manage all the data received in our central hotel software within the hotel group. The responsible entity is the hotel in which the booking is made. The respective booking data can only be viewed by the responsible body. Access to a guest's master data is used together, e.g. to make a reservation for another hotel at a later date, to rebook or to carry out marketing activities in a centralised manner. For this purpose, central services such as reservation and marketing access this data. The legal basis for processing the data is our legitimate interest in data processing within the framework of central administration and use of the data of our customers and business partners within the hotel group.

If services are used, as a rule only such data is collected as is required for the provision of the services. If further data is collected, it is voluntary information. Personal data is processed exclusively to fulfil the requested service and to protect our own justified business interests.

Contact details of guests can be used by sales for promotional purposes at a later date. Promotional activities preferably include mailings. The use of the e-mail address requires the consent of the guest.

Your data will only be processed for purposes other than those mentioned above if such processing is permissible pursuant to Art. 6 (4) GDPR and is compatible with the original purposes of the contractual relationship. We will inform you about such processing prior to any such further processing of your data.

Legal basis for data processing

The legal basis for the processing of the data is the conclusion of an accommodation contract with the guest.

The transmitted data will be stored in our hotel software and used for the execution of the contract. If there is no contractual relationship, we delete the data after one year at the end of the year.

Groups of persons, data and categories of data concerned:

The following categories of personal data are collected, processed and used in order to fulfil the stated purpose:

- Guest data (esp. first and last name, address data, contact data, reservation data, guest requests, billing data)
- Other customer data (especially address data, billing and performance data)
- Interested party data (esp. interest in accommodation, address data)

Recipients to whom the data may be disclosed:

Data may be communicated to the following recipients:

- Internal units involved in the execution and fulfilment of the respective business processes (e.g. hotels of the hotel group, central reservation, accounting, sales & marketing, IT organisation)
- Public bodies that receive data on the basis of statutory regulations (e.g. law enforcement agencies, authorities from the public sector)
- External contractors according to Art. 28 GDPR (service companies)
- Other external bodies (e.g. credit institutions, companies insofar as the persons concerned have declared their written consent or transmission is permissible for predominant legitimate interest)

Purpose of the data processing

The main purpose of the collection, processing or use of personal data is the management, care and hospitality of quests within the framework of the accommodation contract.

Duration of storage

The legislator has enacted a variety of retention obligations and periods. After these periods have expired, the corresponding data and data records are routinely deleted or anonymised if they are no longer required for the fulfilment of the contract. For example, the commercial or financial data of a completed business year are deleted in accordance with legal regulations after a further ten years, unless longer retention periods are prescribed or required for justified reasons. Reservation documents can be destroyed after 6 years, the special registration form after one year at the end of the year.

Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address datenschutz@sanahotels.com for this purpose.

Online booking via the website

Description and scope of data processing

On our website there is the possibility to book rooms and arrangements for the SANA Berlin Hotel. If you take advantage of this option, the data entered in the input mask will be transmitted to us and stored. These data are:

- Name.
- Contact details (e-mail address, telephone),
- Address.
- · contact person for corporate clients, if applicable,
- Arrival dates (number, arrival and departure),
- Wishes.
- Payment data (credit card)
- Date, time of booking.

If you make an online booking from our websites, this is done through the online reservation system of **TravelClick, Inc.**, address: 7 Times Square, 38th Floor, New York, USA. All booking data you enter is transmitted in encrypted form.

Legal basis for data processing

The legal basis for the processing of the data is the conclusion of an accommodation contract with the guest.

The transmitted data will be stored in our hotel software and used for the execution of the contract. If there is no contractual relationship, we delete the data after one year at the end of the year.

Purpose of the data processing

The processing of the personal data from the input mask serves us solely to process the booking request and to handle the payment transaction.

Duration of storage

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of a contractual relationship, we will delete the data received as soon as national, commercial law, statutory or contractual retention requirements have been fulfilled. Reservation data will be deleted from our online booking system 60 days after check-out.

Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address <u>datenschutz@sanahotels.com</u> for this purpose. We would like to point out that in the event of an objection, the booking cannot be completed.

Online booking via other websites

Description and scope of data processing

The SANA Berlin Hotel gives guests the option of booking rooms and arrangements via hotel reservation portals (third-party providers). If you take advantage of this option, the data entered in the input mask will be transmitted to us and stored to the extent permitted by the respective hotel reservation portal in accordance with its own data protection regulations. Data can be:

- Name,
- Contact details (e-mail address, telephone),
- Address,
- Number of fellow travellers,
- Arrival dates (number, arrival and departure),
- estimated time of arrival,
- Wishes.
- Payment data (credit card).

If you make an online booking from our other websites, these are transferred to our hotel software by the channel manager of **TravelClick, Inc.**, address: 7 Times Square, 38th Floor, New York, USA into our hotel software. All booking data entered by you will be transmitted in encrypted form. Our contractual partner has undertaken to handle your transmitted data in accordance with data protection regulations. It takes all organisational and technical measures to protect your data.

Legal basis for data processing

The legal basis for the processing of the data is the conclusion of an accommodation contract within the framework of a mediation with the guest.

The transmitted data will be stored in our hotel software and used for the execution of the contract. If there is no contractual relationship, we delete the data after one year at the end of the year.

Purpose of the data processing

The processing of the personal data from the input mask serves us solely to process the booking request and to handle the payment transaction.

Duration of storage

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of a contractual relationship, we will delete the data received as soon as national, commercial law, statutory or contractual retention requirements have been fulfilled. SANA Berlin Hotel has no influence on the storage periods at the respective hotel reservation portal. Reservation data is deleted from our Channel Manager 60 days after checkout.

Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address datenschutz@sanahotels.com for this purpose. We would like to point out that in the event of an objection, the booking cannot be completed.

Support, advice and advertising for corporate clients

Description and scope of data processing

For the support, advice and advertising of corporate customers, we collect and use the contact person, telephone number and postal address in addition to the business partner or also potential business partner. We obtain the information from various sources, either through an enquiry (e-mail or telephone), but also via events, trade fairs, business cards that our sales staff receive, etc.

Legal basis for data processing

The legal basis for processing the data is also our legitimate interest in data processing. If the contact is aimed at the conclusion of a contract, the additional legal basis for the processing is the contract initiation relationship or contractual relationship. To increase our services, we manage all data received in the CRM module of our hotel software.

Purpose of the data processing

We use this contact data exclusively for our own purposes and for the needs-based design of our own sales activities.

Duration of storage

In principle, no deletion period is foreseen. However, if our sales department has not had any contact with the company contact within 3 years, the sales department will decide whether the contact person of the company contact will be deleted.

If the contact is a pre-contractual relationship (offer, booking or reservation request), the transmitted data will also be stored in our hotel software and used to execute the contract. If there is no contractual relationship, we delete the data after one year at the end of the year.

Possibility of objection

As the contact person of a company contact, you have the option to object to the processing of your data at any time. We have set up the e-mail address <u>datenschutz@sanahotels.com</u> for this purpose. All personal data of the contact person that has been stored for the business partner will be deleted in this case.

Online evaluation

Description and scope of data processing

Former guests can submit a review to our hotel after check-out. For this purpose, we would like to send you an email within 14 days after departure to ask you to submit a hotel review. Each rating can be published anonymously upon request. If you did not feel comfortable in our hotel, we would like to take the opportunity to contact you.

When you submit an online review, the data is stored in the review tool of **REVIEW RANK**, **S.A.**. Calle Aribau,240, 6-M, CP-08006 Barcelona, Spain.

If you, as a former guest, make use of the possibility of online evaluation, your data will be stored in the evaluation mask. These data are: *E-mail address as well as voluntary details such as first name, last name, language and the details of the rating.*

Legal basis for data processing

The legal basis for processing the data is our legitimate interest in processing the data.

Purpose of the data processing

The purpose of the hotel evaluation is to communicate and summarise opinions of hotel guests via our website and third-party websites, so that interested parties can form their own opinion about our performance and services. In addition, the results serve our internal quality management.

The data will only be used for the publication of the rating and for arbitration in case of bad ratings.

Duration of storage

The data is not deleted for the time being.

Possibility of objection and removal

You have the option to object to the use of your email address for sending an evaluation email on the registration form. In addition, you can have the publication of the rating deleted (right to be forgotten). For this purpose we have set up the e-mail address datenschutz@sanahotels.com. Please let us know which evaluation is concerned!

Newsletter service

Description and scope of data processing

On our website you have the option of subscribing to the SANA Hotels newsletter service. If you take advantage of this option, the data entered in the input mask (e-mail address) will be transmitted to and stored by **SANA Hotels Portugal**, **S.A.**, Cais das Naus, Lote 2.15.02, 1990-173 Lisboa, Portugal.

If we otherwise receive an email address where the recipient clearly tells us that they would like to receive our newsletter, we will collect their details via the input mask on our website.

Legal basis for data processing

The legal basis for the processing of the data is the existence of the recipient's consent. This is ensured by a double-opt-in procedure.

Purpose of the data processing

The processing of personal data is solely for the purpose of sending individual newsletters.

Duration of storage

The data will be deleted as soon as the newsletter service is cancelled.

Possibility of objection

As a recipient of newsletters, you have the option to object to the use of your data for advertising purposes at any time. With each newsletter you have the option to unsubscribe from the newsletter service.

In addition, we have set up the e-mail address <u>datenschutz@sanahotels.com</u>. Please let us know the e-mail address here!

Purchase of a voucher via the website

Description and scope of data processing

On our website there is the possibility to buy vouchers. If you take advantage of this option, the data entered in the input mask will be transmitted to us and stored. These data are:

- Salutation/Name.
- Address.
- E-mail address,
- Voucher value,
- Purpose,
- Payment details.

If you make a voucher value from our websites, this is done through our online ordering platform. If you pay by credit card, the payment is processed via a paylink of the payment provider Concardis GmbH, Helfmann-Park 7, 65760 Eschborn/Germany. The data required for this (card number, validity and verification number) are recorded and processed in encrypted form exclusively by the payment provider and not by the responsible party, are not forwarded and cannot be viewed by the website operator. Electronic payment by credit card is PCI-DSS certified and offers the customer the highest possible data security. The processing of your data by the payment provider is based on Art. 6 Paragraph 1 lit a GDPR (consent) and Art.6 Paragraph 1 lit b GDPR (processing for the fulfilment of a contract). For further information, please refer to the data protection information of Concardis GmbH at.

Legal basis for data processing

The legal basis for the processing of the data is the conclusion of a purchase contract with the user.

Purpose of the data processing

The processing of the personal data from the input mask serves us solely to process the voucher purchase and to handle the payment transaction.

Duration of storage

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of a contractual relationship, we will delete the data received as soon as national, commercial law, statutory or contractual retention requirements have been fulfilled.

Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address <u>datenschutz@sanahotels.com</u> for this purpose. We would like to point out that in the event of an objection, the purchase of the voucher cannot be completed.

SANA Card

Description and scope of data processing

On our website you have the option of registering for our SANA Card bonus programme. If you take advantage of this option, the data entered in the input mask will be transmitted to us and stored. These data are:

- Company,
- Company address,
- Contact details (email address, telephone) Company and cardholder,
- Tax number,
- Name of the cardholder.

All participating SANA Hotels have access to the registration data. **SANA Hotels Portugal, S.A.,** Cais das Naus, Lote 2.15.02, 1990-173 Lisboa, Portugal is the responsible entity for the provision of our bonus programme.

Legal basis for data processing

The legal basis for the processing of the data is the conclusion of a contract within the framework of our bonus programme.

Purpose of the data processing

The processing of the personal data from the input mask serves us solely for the registration in our bonus programme and for the creation and sending of the SANA Card. The SANA Card serves the cardholder to receive bookings and sales at defined conditions (discount) at our participating hotels.

Duration of storage

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of a contractual relationship, we will delete the data received as soon as national, commercial law, statutory or contractual retention requirements have been fulfilled. SANA Berlin Hotel has no influence on the storage periods at the respective hotel reservation portal. Reservation data is deleted from our Channel Manager 60 days after check-out.

Possibility of objection

You have the option to object to the processing of your data at any time. We have set up the e-mail address <u>datenschutz@sanahotels.com</u> for this purpose. We would like to point out that in the event of an objection or termination, you will no longer be able to use the bonus programme.

Your application to a job advertisement

Description and scope of data processing

On our website and via internet portals (in particular hotelcareer.de) there is the possibility to apply for advertised positions. If you take advantage of this opportunity as an applicant, the data transmitted to us may be stored and used. These data are:

- Salutations, first name, surname
- Contact details (e-mail address, telephone)
- Cover letter
- File attachment with the detailed application

In this context, the data will initially not be passed on to third parties. The data will otherwise be used exclusively for processing the application by the specialist department and for communication.

Legal basis for data processing

The legal basis for processing the data is the contract initiation relationship or the conclusion of a contract with the user. For the longer-term storage of application documents, we will obtain consent beforehand.

Purpose of the data processing

The processing of personal data is solely for the purpose of processing the application.

Duration of storage

The data will be deleted as soon as it is no longer required to achieve the purpose for which it was collected, at the latest 6 months after rejection. In the case of a contractual relationship, we will delete the data received as soon as national, commercial law, statutory or contractual retention requirements have been fulfilled.

Possibility of objection

You have the option to object to the processing of your data at any time. To do so, please send an e-mail to the office where you sent the application (the job advertiser). In addition, we have set up the e-mail address datenschutz@sanahotels.com.

Provision of the website and creation of log files

Description and scope of data processing

Each time our website is accessed, our system automatically collects data and information from the computer system of the accessing computer. The following data is collected:

- Information about the browser type and version used
- The operating system of the user
- The IP address of the user
- Date and time of access
- Websites from which the user's system accesses our website
- Websites that are accessed by the user's system via our website

The data is also stored in the log files of our system. This data is not stored together with other personal data of the user. Personal user profiles cannot be formed. The stored data is only evaluated for statistical purposes.

Legal basis for data processing

The legal basis for the temporary storage of the data and the log files is the processing to protect our legitimate interest.

Purpose of the data processing

The temporary storage of the IP address by the system is necessary to enable delivery of the website to the user's computer. For this purpose, the user's IP address must remain stored for the duration of the session.

The storage in log files is done to ensure the functionality of the website. In addition, we use the data to optimise the website and to ensure the security of our information technology systems. An evaluation of the data for marketing purposes does not take place in this context.

Our legitimate interest in data processing also lies in these purposes.

Duration of storage

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected. In the case of the collection of data for the provision of the website, this is the case when the respective session has ended.

In the case of storage of data in log files, this is the case after seven days at the latest. Storage beyond this period is possible. In this case, the IP addresses of the users are deleted or alienated so that an assignment of the calling client is no longer possible.

Possibility of objection and removal

The collection of data for the provision of the website and the storage of the data in log files is absolutely necessary for the operation of the website. Consequently, there is no possibility for the user to object.

Use of cookies and scripts

Description and scope of data processing

Cookies are small text files that are sent by us to the browser of your end device when you visit our website and are stored there. As an alternative to the use of cookies, information can also be stored in the local storage of your browser. Some functions of our website cannot be offered without the use of cookies or local storage (technically necessary cookies). Other cookies, however, enable us to carry out various analyses, so that we are able, for example, to recognise the browser you are using when you visit our website again and to transmit various information to us (non-essential cookies). With the help of cookies, we can, among other things, make our website more user-friendly and effective for you, for example by tracking your use of our website and determining your preferred settings (e.g. country and language settings). If third parties process information via cookies, they collect the information directly via your browser. Cookies do not cause any damage to your end device. They cannot execute programs or contain viruses.

We also use cookies on our website that enable an analysis of the user's surfing behaviour. The following data can be transmitted in this way: Search terms entered, frequency of page views, use of website functions. The user data collected in this way is pseudonymised by technical precautions. Therefore, it is no longer possible to assign the data to the calling user. The data is not stored together with other personal data of the user. When calling up our website, the user is informed about the use of cookies for analysis purposes and his or her consent to the processing of the personal data used in this context is obtained. In this context, a reference to this data protection declaration is also made.

We provide information about the respective services for which we use cookies in the individual processing operations. Detailed information on the cookies used can be found in the cookie settings or in the Consent Manager of this website.

Domain	Name	Description	Storage period
fonts.net	cf_bm	Thecf_bm cookie is a cookie required to support Cloudflare Bot Management, which is currently in private beta. As part of our bot management service, this cookie helps manage incoming traffic that meets the criteria of bots.	Session
berlin.sanahotels.com	_pk_id.358752.75cd	This cookie name is linked to the open source web analytics platform Piwik. It is used to help website owners track visitor behaviour and measure website performance. It is a pattern type cookie where the prefix _pk_id is followed by a short series of numbers and letters that is assumed to be a reference code for the domain that sets the cookie.	•
berlin.sanahotels.com	_pk_ses.358752.75cd	This cookie name is linked to the open source web analytics platform Piwik. It is used to help website owners track visitor behaviour and measure website performance. It is a pattern type cookie where the prefix _pk_ses is followed by a short series of numbers and letters that is assumed to be a reference code for the domain that sets the cookie.	

Legal basis for data processing

The legal basis for the processing of personal data using technically necessary cookies is our legitimate interest in data processing.

The legal basis for the processing of personal data using cookies for analysis purposes is the existence of a relevant consent of the user.

Purpose of the data processing

The purpose of using technically necessary cookies is to simplify the use of websites for users. Some functions of our website cannot be offered without the use of cookies. For these, it is necessary that the browser is recognised even after a page change. The user data collected through technically necessary cookies are not used to create user profiles.

Analysis cookies are used to improve the quality of our website and its content. Through the analysis cookies, we learn how the website is used and can thus constantly optimise our offer.

Duration of storage, possibility of objection and elimination

Cookies are stored on the user's computer and transmitted from it to our site. Therefore, you as a user also have full control over the use of cookies. By changing the settings in your internet browser, you can deactivate or restrict the transmission of cookies. Cookies that have already been stored can be deleted at any time. This can also be done automatically. If cookies are deactivated for our website, it may no longer be possible to use all the functions of the website to their full extent.

Use of analysis and tracking tools

Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookies about the use of this website by the users is usually transmitted to a Google server in the USA and stored there. In the event that IP anonymisation is activated on this website, however, Google will truncate the user's IP address beforehand within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. IP anonymisation is active on this website.

On behalf of the operator of this website, Google will use this information for the purpose of evaluating the use of the website by users, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

Users may refuse the use of cookies by selecting the appropriate settings on their browser, however please note that if you do this you may not be able to use the full functionality of this website. Users may also prevent the collection of data generated by the cookie and relating to their use of the website (including their IP address) by Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link.

As an alternative to the browser add-on or within browsers on mobile devices, <u>please click this link</u> to prevent the collection by Google Analytics within this website in the future. This will place an opt-out cookie on your device. If you delete your cookies, you must click this link again.

Matomo

We use Matomo (formerly Piwik) for web analytics, a service provided by InnoCraft Ltd, 150 Willis St, 6011 Wellington, New Zealand, NZBN 6106769, ("Matomo") using cookie technology. The protection of your data is important to us, which is why we have additionally configured Matomo in such a way that your IP address is only recorded in abbreviated form. We therefore process your personal usage data anonymously. It is not possible for us to draw any conclusions about your person. You can find further information in the Matomo privacy policy.

Facebook Pixel

We use Facebook Pixel from Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, to create so-called Custom Audiences, i.e. to segment groups of visitors to our online offering, to determine conversion rates and to subsequently optimise these. This happens in particular when you interact with advertisements that we have placed with Meta Platforms Ireland Limited.

We process your data using Facebook Pixel for the purpose of optimising our website and for marketing purposes based on your consent in the Consent Manager.

The concrete storage period of the processed data cannot be influenced by us, but is determined by Meta Platforms Ireland Limited. Further information can be found in the <u>privacy policy</u> for Facebook Pixel.

Soy Pixel

We use Sojern Pixel from Sojern, Inc., 255 California Street Suite 1000 San Francisco, CA 94111, United States, to create so-called Custom Audiences, i.e. to segment groups of visitors to our online offering, to determine conversion rates and to subsequently optimise these. This happens in particular when you interact with advertisements that we have placed with Sojern, Inc.

We process your data using Sojern Pixel for the purpose of optimising our website and for marketing purposes based on your consent via the Consent Manager.

The specific storage period of the processed data cannot be influenced by us, but is determined by Sojern, Inc. Further information can be found in the <u>privacy policy</u> for Sojern Pixel.

Use of Google services

Google Tag Manager

We use Google Tag Manager provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Google Tag Manager is used to manage website tags through one interface and allows us to control the exact integration of services on our website

This allows us to flexibly integrate additional services to evaluate user access to our website.

The use of Google Tag Manager is based on our legitimate interests, i.e. interest in optimising our services.

The concrete storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the <u>privacy policy</u> for Google Tag Manager.

Deactivation of Google advertising

(http://www.google.com/privacy_ads.html) or on the deactivation page of the Network Advertising Initiative (http://www.networkadvertising.org/managing/opt out.asp).

Google DoubleClick

We have integrated components of DoubleClick by Google on our website. DoubleClick is a brand of Google, under which mainly special online marketing solutions are marketed to advertising agencies and publishers. DoubleClick by Google transfers data to the DoubleClick server with each impression as well as with clicks or other activities.

Each of these data transfers triggers a cookie request to the browser of the data subject. If the browser accepts this request, DoubleClick sets a cookie in your browser.

DoubleClick uses a cookie ID, which is required to process the technical procedure. The cookie ID is required, for example, to display an advertisement in a browser. DoubleClick can also use the cookie ID to record which advertisements have already been displayed in a browser in order to avoid duplicate placements. Furthermore, the cookie ID enables DoubleClick to record conversions. Conversions are recorded, for example, if a DoubleClick advertisement has previously been displayed to a user and the user subsequently makes a purchase on the advertiser's website using the same internet browser.

A DoubleClick cookie does not contain any personal data, but may contain additional campaign identifiers. A campaign identifier serves to identify the campaigns with which you have already been in contact on other websites. As part of this service, Google obtains knowledge of data that Google also uses to generate commission statements. Among other things, Google can track that you have clicked on certain links on our website. In this case, your data will be passed on to the operator of DoubleClick, Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. Further information and the applicable data protection provisions of DoubleClick by Google can be found at https://policies.google.com/privacy.

We process your data with the help of the Double-Click cookie for the purpose of optimising and displaying advertising based on your consent. You give your consent by setting the use of cookies (cookie banner / Consent Manager), with which you can also declare your revocation at any time with effect for the future in accordance with Art. 7 (3) GDPR. The cookie is used, among other things, to place and display user-relevant advertising and to create reports on advertising campaigns or to improve them. Furthermore, the cookie is used to avoid multiple displays of the same advertisement. Each time you call up one of the individual pages of our website on which a DoubleClick component has been integrated, your browser is automatically prompted by the respective DoubleClick component to transmit data to Google for the purpose of online advertising and the settlement of commissions. There is no legal or contractual obligation to provide your data. If you do not give us your consent, it will be possible to visit our website without restriction, but not all functions may be fully available.

The concrete storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the <u>privacy policy</u> for Google DoubleClick.

Google Ads

We have integrated Google Ads on our website. Google Ads is a service provided by Google Ireland Limited to display targeted advertising to users. Google Ads uses cookies and other browser technologies to analyse user behaviour and recognise users.

Google Ads collects information about visitor behaviour on various websites. This information is used to optimise the relevance of advertising. Furthermore, Google Ads delivers targeted advertising based on behavioural profiles and geographical location. Your IP address and other identifiers such as your user agent are transmitted to the provider.

If you are registered with a Google Ireland Limited service, Google Ads can associate the visit with your account. Even if you are not registered with Google Ireland Limited or have not logged in, it is possible that the provider will find out and store your IP address and other identifying features.

In this case, your data will be passed on to the operator of Google Ads, Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

We process your data with the help of Google Ads for the purpose of optimising our website and for marketing purposes based on your consent.

The concrete storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the <u>privacy policy</u> for Google Ads.

Google CDN

We use Google CDN to properly deliver the content of our website. Google CDN is a service of Google Ireland Limited, which acts as a content delivery network (CDN) on our website.

A CDN helps to provide content of our online offer, in particular files such as graphics or scripts, more quickly with the help of regionally or internationally distributed servers. When you access this content, you establish a connection to servers of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, whereby your IP address and possibly browser data such as your user agent are transmitted. This data is processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Google CDN.

The use of the Content Delivery Network is based on our legitimate interests, i.e. interest in a secure and efficient provision and optimisation of our online offer.

The concrete storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the <u>privacy policy</u> for Google CDN.

Google Fonts

We use Google Fonts from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, as a service to provide fonts for our online offer. To obtain these fonts, you establish a connection to servers of Google Ireland Limited, whereby your IP address is transmitted.

The use of Google Fonts is based on our legitimate interests, i.e. interest in a uniform provision and optimisation of our online offer.

The concrete storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the <u>privacy policy</u> for Google Fonts.

Google reCAPTCHA

We have integrated components of Google reCAPTCHA on our website. Google reCAPTCHA is a service of Google Ireland Limited and enables us to distinguish whether a contact request originates from a natural person or is automated by means of a program. When you access this content, you establish a connection to servers of Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, whereby your IP address and possibly browser data such as your user agent are transmitted. Furthermore, Google reCAPTCHA records the user's browsing time and mouse movements in order to distinguish automated requests from human ones. This data is processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Google reCAPTCHA.

The service is used on the basis of our legitimate interests, i.e. for protection when submitting forms.

The specific storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the <u>privacy policy</u> for Google reCAPTCHA.

Google Services

We use Google Services from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, to access additional services and data from Google Ireland Limited. This involves a transfer of your IP address to Google Ireland Limited. Please note that there is a separate section in this privacy policy for each additional service we use from Google Ireland Limited.

The use of Google Services is based on our legitimate interests, i.e. interest in optimising our online offer.

The concrete storage period of the processed data cannot be influenced by us, but is determined by Google Ireland Limited. Further information can be found in the <u>privacy policy</u> for Google Services.

Google Maps

This website uses Google Maps API, a mapping service provided by Google Inc. ("Google"), to display an interactive map and to create directions. Google Maps is operated by Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

By using Google Maps, information about your use of this website (including your IP address) may be transmitted to a Google server in the USA and stored there. Google may transfer the information obtained through Maps to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

Google will not associate your IP address with any other data held by Google. It is nevertheless technically possible that Google could identify at least individual users on the basis of the data received. It is possible that personal data and personality profiles of users of the website could be processed by Google for other purposes over which we have and can have no control.

The legal basis for the use of Google Maps is our legitimate interest in data processing.

The purpose of using Google Maps is to show the user our location on the website and to give him the possibility to determine different directions via the services of Google Maps.

You have the option of deactivating the Google Maps service and thus preventing the transfer of data to Google by deactivating JavaScript in your browser. However, we would like to point out that in this case you will not be able to use the map display on our website.

Use of social media plugins

The use of social media plugins is in the interest of an appealing presentation and expansion of our online offers. This constitutes a legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR.

Use of Facebook plugins

Plugins of the social network **Facebook**, 1601 South California Avenue, Palo Alto, CA 94304, USA are integrated on our pages. You can recognise the plugins by the logo on our page. You can find an overview of the plugins here.

We have no influence on the data collection and further processing by Facebook. Furthermore, it is not apparent to us to what extent, where and for how long the data is stored, to what extent Facebook complies with existing deletion obligations, what evaluations and links are made

with the data and to whom the data is passed on. If you would like to avoid Facebook processing personal data that you have transmitted to us, please contact us by other means.

You can find more information on this in Facebook's <u>privacy policy</u>. If you do not want Facebook to be able to assign your visit to our pages to your user account, please log out of your respective user account!

Facebook fan page

On our Facebook fan page at: https://www.facebook.com/SANABerlinHotel/ we use plugins from the provider Facebook.com, which are provided by the company Facebook Inc., 1601 S. California Avenue, Palo Alto, CA 94304 in the USA.

By using the fan page, data is forwarded to the Facebook servers, which contain information about your visits to our fan page. For logged-in users, this results in the usage data being assigned to their personal Facebook account. As soon as you actively use the Facebook plugin as a logged-in Facebook user, e.g. by clicking on the "Facebook" logo or using the comment function, this data is transferred to your Facebook account and published. You can only avoid this by logging out of your Facebook account first.

We do not know exactly what data Facebook stores and uses. As a user of the fan page, you must therefore expect that Facebook also stores your actions on the fan page without gaps.

Otherwise, the <u>General Terms of Use</u> of Facebook Ireland Limited, Hanover Reach, 5-7 Hanover Quay, Dublin 2, Ireland apply.

The legal basis for this data processing is Art. 6 para. 1 lit. a, f) GDPR.

Every person depicted as well as other third parties have the possibility to object to the publication of their personal data (photos) at any time. We have set up the e-mail address datenschutz@sanahotels.com for this purpose. The right to object applies in particular to the publication of pictures for the future.

It can always happen that we accidentally publish pictures of people where no consent has been given. If publication is not desired, we will immediately do everything possible to comply with your right. In the case of group pictures, we reserve the right to distort faces.

Use of Instagram plugins

The "Instagram button" is used on this website. When you access this website, your browser establishes a connection to servers of the social network Instagram, offered by **Instagram Inc**, 1601 Willow Road, Menlo Park, CA, 94025, USA.

When you visit our pages, a direct connection is established between your browser and the Instagram server via the plugin. Instagram thereby receives the information that you have visited our site with your IP address. If you click the Instagram button while you are logged into your Instagram account, you can link the content of our pages on your Instagram profile. This enables Instagram to associate your visit to our pages with your user account. We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by Instagram.

For more information, please see Instagram's privacy policy.

LinkedIn Insight Tag

We use LinkedIn Insight-Tag from LinkedIn Corporation, Sunnyvale, California, US, to create target groups, segment visitor groups of our online offer, determine conversion rates and subsequently optimise them. This happens in particular when you interact with advertisements

that we have placed with LinkedIn Corporation. For this purpose, LinkedIn Corporation offers retargeting for website visitors in order to display targeted advertising outside of our website.

LinkedIn Insight tag collects data about visits to our website, including URL, referrer URL, IP address, device and browser properties (user agent) and timestamp. This data is used to present anonymised reports on website audience and ad performance.

We process your data using LinkedIn Insight Tag for the purpose of optimising our website and for marketing purposes based on your consent via the Consent Manager.

The concrete storage period of the processed data cannot be influenced by us, but is determined by LinkedIn Corporation. Further information can be found in the <u>privacy policy</u> for LinkedIn Insight-Tag.

LinkedIn Ads

We have integrated LinkedIn Ads on our website. LinkedIn Ads is a service provided by LinkedIn Corporation that displays targeted advertising to users. LinkedIn Ads uses cookies and other browser technologies to analyse user behaviour and recognise users. LinkedIn Ads collects information about visitor behaviour on various websites. This information is used to optimise the relevance of the advertising. Furthermore, LinkedIn Ads delivers targeted advertising based on behavioural profiling and geographic location. Your IP address and other identifiers such as your user agent are transmitted to the provider. In this case, your data is passed on to the operator of LinkedIn Ads, LinkedIn Corporation, Sunnyvale, California, US.

Web tracking technologies are used to create pseudonymised user profiles. These profiles cannot be linked to you as a natural person, but are used, for example, for segmentation when displaying advertisements.

We process data using LinkedIn Ads for the purpose of optimising our advertising campaigns and for marketing purposes based on your consent via the Consent Manager.

The concrete storage period of the processed data cannot be influenced by us, but is determined by LinkedIn Corporation. Further information can be found in the <u>privacy policy</u> for LinkedIn Ads.

Fast Fonts (Monotype)

We use Fast Fonts from Monotype Imaging Inc, 600 Unicorn Park Drive, Woburn, Massachusetts 01801 USA, as a service to provide fonts for our online offering. To obtain these fonts, you establish a connection to Monotype Imaging Inc. servers, whereby your IP address is transmitted.

The use of Fast Fonts is based on our legitimate interests, i.e. interest in a uniform provision and optimisation of our online offer.

The specific storage period of the processed data cannot be influenced by us, but is determined by Monotype Imaging Inc. Further information can be found in the <u>data protection</u> declaration for Fast Fonts.

ReviewPro

We have integrated ReviewPro components on our website. ReviewPro is a rating service that allows users to rate our services. If you rate our services, data about the service used may be transmitted to Review Rank, S.A. to verify authenticity. ReviewPro enables us to obtain content such as ratings directly from Review Rank, S.A. and display it on our website. For this purpose, your current IP address is usually transmitted to the service.

Furthermore, ReviewPro stores information by means of cookies in order to find out which online offers have been visited. In this case, your data is passed on to the operator of ReviewPro, Review Rank, S.A., C/Aribau 240, 6-M, 08006 Barcelona, Spain.

ReviewPro is used on the basis of Art. 6 para. 1 lit. f. GDPR to inform users about the quality of our services. If the user consents to the processing of his data, the legal basis for the processing is Art. 6 para. 1 lit. a. GDPR.

The specific storage period of the processed data cannot be influenced by us, but is determined by Review Rank, S.A.. Further information can be found in the <u>data protection</u> <u>declaration</u> for ReviewPro.

THE HOTELS NETWORK

We have integrated THE HOTELS NETWORK on our website. THE HOTELS NETWORK is a service provided by THE HOTELS NETWORK, S.L., Av. Diagonal, 439, 3°-1°, 08036 Barcelona, Spain. We use THE HOTELS NETWORK to accept reservations and measure their success.

THE HOTELS NETWORK uses cookies and other browser technologies to analyse user behaviour, recognise users and increase direct bookings. This information is used, among other things, to compile reports on website activity.

Furthermore, THE HOTELS NETWORK enables us to make direct bookings via our website. Your IP address and other identification features such as your user agent are transmitted to the provider.

The service is used for the purpose of optimising our website and for marketing purposes based on your consent via the Consent Manager.

The specific storage period of the processed data cannot be influenced by us, but is determined by THE HOTELS NETWORK, S.L.. Further information can be found in the <u>privacy</u> policy for THE HOTELS NETWORK.

Bing Ads

We have integrated Bing Ads on our website. Bing Ads is a service provided by Microsoft Corporation to display targeted advertising to users. Bing Ads uses cookies and other browser technologies to analyse user behaviour and recognise users.

Bing Ads collects information about visitor behaviour on various websites. This information is used to optimise the relevance of advertising. Furthermore, Bing Ads delivers targeted advertising based on behavioural profiling and geographic location. The provider is provided with your IP address and other identifiers such as your user agent.

In this case, your data will be passed on to the operator of Bing Ads, Microsoft Corporation, One Microsoft Way Redmond, WA 98052-6399, United States.

We process your data using Bing Ads for the purpose of optimising our website and for marketing purposes based on your consent in the Consent Manager.

The specific storage period of the processed data cannot be influenced by us, but is determined by Microsoft Corporation. Further information can be found in the <u>privacy policy</u> for Bing Ads.

Yandex Maps

We use the map service Yandex Maps to create directions. Yandex Maps is a service of Yandex LLC, which displays a map on our website.

When you access this content on our website, you establish a connection to servers of Yandex LLC, Moscow, Moscow City, RU, whereby your IP address and possibly browser data such as your user agent are transmitted. This data is processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Yandex Maps.

Yandex Maps is used for the purpose of optimising our website to make it easier for you to find named locations on the website, based on your consent in the Consent Manager.

The specific storage period of the processed data cannot be influenced by us, but is determined by Yandex LLC. Further information can be found in the <u>privacy policy</u> for Yandex Maps.

Cloudflare CDN

We use Cloudflare CDN to properly deliver the content of our website. Cloudflare CDN is a service of Cloudflare, Inc. which acts as a content delivery network (CDN) on our website.

A CDN helps to provide content of our online offer, in particular files such as graphics or scripts, more quickly with the help of regionally or internationally distributed servers. When you access this content, you establish a connection to servers of Cloudflare, Inc., whereby your IP address and possibly browser data such as your user agent are transmitted. This data is processed exclusively for the above-mentioned purposes and to maintain the security and functionality of Cloudflare CDN.

The use of the Content Delivery Network is based on our legitimate interests, i.e. interest in a secure and efficient provision and optimisation of our online offer.

The concrete storage period of the processed data cannot be influenced by us, but is determined by Cloudflare, Inc. Further information can be found in the <u>privacy policy</u> for Cloudflare CDN.

Protection of minors

This service is mainly aimed at adults. We do not currently market any specific areas for children. Accordingly, we do not knowingly collect age-identifying information, nor do we knowingly collect personal information from children under the age of 16. However, we caution all visitors to our website under the age of 16 not to disclose or provide any personally identifiable information through our service. In the event that we discover that a child under the age of 16 has provided us with personal information, we will delete the child's personal information from our files to the extent technically feasible.

Rights of the data subject

If your personal data is processed, you are a data subject within the meaning of the GDPR and you have the following rights vis-à-vis the controller:

- You have a right to information about the personal data stored about you, about the purposes of processing, about any transfers to other bodies and about the duration of storage.
- If data is inaccurate or no longer necessary for the purposes for which it was collected, you may request that it be **corrected**, **erased** or **restricted from** processing. Where provided for in the processing procedures, you may also consult your data yourself and correct them if necessary.
- Should grounds against the processing of your personal data arise from your particular
 personal situation, you may, insofar as the processing is based on a legitimate
 interest, object to it. The controller shall no longer process the personal data
 concerning you unless it can demonstrate compelling legitimate grounds for the
 processing which override your interests, rights and freedoms, or the processing serves
 the purpose of asserting, exercising or defending legal claims.
- If the personal data concerning you is processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing; this also applies to profiling insofar as it is related to such direct marketing. If you object to the processing for direct marketing or profiling purposes, the personal data concerning you will no longer be processed for these purposes.

You have the right to **revoke your declaration of consent under data protection law at any time**. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

If you have any questions about your rights and how to exercise them, please contact the data controller or the data protection officer.

Right to complain to a supervisory authority

As a data subject, without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a data protection supervisory authority, in particular in the Member State of your residence or of the place of the alleged infringement, if you consider that the processing of personal data relating to you infringes data protection.

The supervisory authority to which the complaint is submitted will inform you of the status and outcome of your complaint, including the possibility of a judicial remedy.

You can find more information on the website of the Federal Commissioner for Data Protection and Freedom of Information. Follow the link.

Security

The SANA Hotel Berlin uses technical and organisational security measures in accordance with Art. 32 GDPR in order to protect the data we have under our control against accidental or intentional manipulation, loss, destruction or against access by unauthorised persons. Our security measures are continuously improved in line with technological developments. Access is only possible for a few authorised persons and persons who are obliged to provide special data protection and who are involved in the technical, administrative or editorial care of data.

Updating and modification

We reserve the right to change, update or amend this privacy notice at any time. Any revised information on data processing will only apply to personal data collected or modified after the effective date.

Status | March 2022