



## Privacy Policy

### Information on data protection in accordance with GDPR Articles 13, 14 and 21

With this annex, Severin\*s Lech GmbH informs you about the processing of your personal data when you visit our hotel and make reservations in our restaurants. In addition, we inform you of the claims and rights to which you are entitled under the data protection regulations.

We hereby fulfil our obligation to provide information pursuant to Articles 13, 14 and 21 of the European General Data Protection Regulation (GDPR).

<p>1. Who is responsible for the processing of my personal data?</p>	<p>Severin*s Lech GmbH          Stubenbach 273          6764 Lech          Österreich          Telefon: +43 5538 33 907-0          tbd</p>
<p>2. Whom can I contact if I have questions about data protection?</p>	<p>You may contact the data protection officer of Severin*s Lech GmbH at:          Martin Vogel          SHIELD GmbH          Postadresse:          Ohlrattweg 5          25497 Prisdorf          Tel.: +49 4101 80 50 600          E-Mail: <a href="mailto:mv@shield-datenschutz.de">mv@shield-datenschutz.de</a></p>
<p>3. What sources and data categories are processed by Severin*s Lech GmbH for my hotel visit, restaurant reservation or event execution?</p>	<p>We receive your personal data via the reservation portals that you use, or directly from you via our internet offers or personal contact with us.          For this, we collect the following data:</p> <ul style="list-style-type: none"> <li>• Personal master data (name, address details)</li> <li>• Communication and contact details (telephone numbers, email address)</li> <li>• Contract master data</li> <li>• Customer history</li> </ul>



	<ul style="list-style-type: none"> <li>• Contractual billing and payment data</li> <li>• Bank details</li> </ul> <p>If you are in default of payment, we collect data about your creditworthiness from third parties:</p> <ul style="list-style-type: none"> <li>• Credit scores (from third parties, for example credit agencies or public directories)</li> </ul>
4. What is the purpose of processing my data?	The company Severin*s Lech GmbH collects and processes your personal data within the context of your hotel visit, your reservation in our hotel or as part of the event execution process.
5. What is the legal basis on which my data are processed?	<p>Severin*s Lech GmbH processes personal data in accordance with the provisions of the EU GDPR: <sup>[L]</sup><sub>[SEP]</sub></p> <ul style="list-style-type: none"> <li>• <b>Processing for the performance of a contract to which the data subject is party or in order to take steps prior to entering into a contract, pursuant to GDPR Article 6(1)(b)</b></li> </ul> <p>With the reservation of a hotel room, the reservation in our restaurant or the participation in an event or the ordering of an event, you enter into a contractual relationship with us. This contract is the legal basis for the appropriated collection and processing of personal data.</p> <ul style="list-style-type: none"> <li>• <b>Processing on the basis of consent, pursuant to GDPR Article 6(1)(a)</b> <sup>[L]</sup><sub>[SEP]</sub></li> </ul> <p>Insofar as we ask you to give us feedback about your restaurant visit or your stay in our hotel, we will always obtain your prior consent.</p> <ul style="list-style-type: none"> <li>• <b>Processing within the scope of our own legitimate interest, pursuant to GDPR Article 6(1)(f)</b> <sup>[L]</sup><sub>[SEP]</sub></li> </ul> <p>The collection of user data when using the websites of Severin*s Lech GmbH is in our own legitimate interest. The specific references to the types of data collected on the</p>



	Internet are explained in the privacy policy of the respective website.
7. How long will my personal data be stored?	<p>If necessary, we process and store your personal data for the duration of our business relationship, which also includes, for example, the initiation and processing of a contract. In addition, we are subject to various storage and documentation obligations, which result, among other things, from the German Commercial Code (HGB) and the Fiscal Code (AO). The periods for storage and documentation specified there range from two to ten years.</p> <p>Finally, the storage period also depends on the statutory limitation periods, which may amount to up to thirty years according to §§ 195 ff. of the German Civil Code (BGB), whereby the regular limitation period is three years.</p>
8. Who receives the data? <sup>[SEP]</sup>	<p>Within the ATLANTIC Hotel Group, those entities which require personal data for the legitimate fulfilment of their respective tasks are granted access to such data. This is especially the company ATLANTIC Hotels Management GmbH, which fulfils central tasks on our behalf.</p> <p>External service providers contracted by Severin*s Lech GmbH may also receive personal data for these purposes if they guarantee that appropriate technical and organizational measures will be taken to ensure that processing is carried out in accordance with the EU GDPR and that the rights of the data subject are protected.<sup>[SEP]</sup></p> <p>In the event of a credit risk, we transmit your data (name, address, email address, company details and, if applicable, contract and receivables data) to the company <i>IHD Gesellschaft für Kredit und Forderungsmanagement mbH</i> (Augustinusstr. 11 B, 50226 Frechen), and, if applicable, to other cooperating credit reporting agencies for the purpose of credit assessment and for checking the deliverability of the stated address and for the purpose of debt collection processing. The legal basis for this transmission is given by</p>



	<p>GDPR Article 6(1)(b) and GDPR Article 6(1)(f). Transmissions on the basis of GDPR Article 6(1)(f) may only take place if this is necessary to safeguard the legitimate interests of our company, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.</p> <p>Detailed information about our contractual partner IHD within the meaning of GDPR Article 14, i.e. the business purpose, the purpose of data storage there, the legal basis, the data recipients at IHD, the right to information and the right to erasure and rectification as well as about profiling can be found at <a href="http://www.ihd.de/datenschutz/Artikel14.html">www.ihd.de/datenschutz/Artikel14.html</a> (German only).</p> <p>In addition, recipients of personal data may be other third parties for whom you have given your consent to the transfer of data or for whom there is a legal obligation to transfer data.</p>
9. Are my data transferred to a third country or to an international organization?	Your personal data will not be transferred to a third country or an international organization.
10. What data protection rights do I have?	<p>You have the right of access to information pursuant to GDPR Article 15, the right to rectification pursuant to GDPR Article 16, the right to erasure pursuant to GDPR Article 17, the right to restriction of processing pursuant to GDPR Article 18, and the right to data portability pursuant to GDPR Article 20. The limitations set out in §§ 34 and 35 of BDSG-neu (Federal Data Protection Act, as amended on 25.05.2018) apply to the right of access to information and the right to erasure. In addition, there is a right to lodge a complaint with a data protection supervisory authority (GDPR Article 77 in conjunction with § 19 of BDSG-neu).</p> <p>If you wish to assert these rights, please contact the data protection officer of Severin*s Lech GmbH; contact details are given above.</p>



11. Do I have a right to lodge a complaint?	Any data subject has the right to lodge a complaint with the supervisory authority responsible for Severin*s Lech GmbH under federal state law (GDPR Article 77):  TBD
12. Is there an obligation for me to provide my personal data?	In the context of the business relationship with Severin*s Lech GmbH, you only have to provide those personal data which are necessary for the establishment and execution of a business relationship or which Severin*s Lech GmbH is legally obliged to collect (e.g. registration form).  Without these data, Severin*s Lech GmbH will normally have to refuse the conclusion of the contract or the execution of the order, or will no longer be able to execute an existing contract and may have to terminate it.
13. To what extent are there automatic decisions in individual cases, including profiling?	Automated decisions, including profiling, are not made in individual cases.
14. Can I object to the processing of my personal data?	As a matter of principle, GDPR Article 21 provides for the right to object to the processing of personal data by Severin*s Lech GmbH. However, we would like to point out that it will then not be possible to stay overnight or to take part in or order an event.  Insofar as the processing of the data is based on consent given previously, this can be withdrawn at any time. This also applies to the revocation of declarations of consent issued to Severin*s Lech GmbH prior to the validity of the EU GDPR, i.e. before 25 May 2018. Revocation of consent does not affect the legality of the data processed until revocation.