

Privacy Policy

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 Schumannstraße 6, 10117 Berlin, is considered the "Data Controller" in respect of the Personal Data that it collects, uses and manages 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.

Whose Personal Data do we collect?

We collect Personal Data from a range of individuals in the context of our business activities, including:

- 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; and
- job applicants.

How we collect your Personal Data

We obtain Personal Data which you knowingly and voluntarily disclose to us, both in an online and offline context. We collect Personal Data when you:

- visit our website;
- contact us via email, telephone or by using the contact form on our website;
- register for an account on our website;
- subscribe to our newsletter;
- book a stay in one of our hotels or apartments;

- check-in at one of our hotels or apartments;
- communicate with us via social networking websites, third party apps or similar technologies; or
- apply for a job with us.

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, 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.

The purposes for which we process your Personal Data

We process your Personal Data for the following purposes:

- 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; and
- for other business-related purposes, including negotiating, concluding and performing contracts, managing accounts and records, supporting corporate social

responsibility activities, legal, regulatory and internal investigations and debt administration.

Recruitment

When you apply for a job via our website or otherwise, we will collect additional more specific Personal Data about you, such as your qualifications, career history, third party references and interview notes. We may also ask you for other information, for example your interests and the types of jobs you are interested in.

The legal basis for processing your Personal Data

In order to comply with applicable data privacy laws, we are required to set out the legal basis for the processing of your Personal Data. In accordance with the purposes for which we collect and use your Personal Data, as set out above, the legal basis for Adina processing your Personal Data will typically be one of the following:

- your consent;
- the performance of a contract that we have in place with you or other individuals;
- Adina or our third parties' legitimate business interests; or
- compliance with our legal obligations.

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 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](#).

We may disclose your Personal Data to third parties in the event that we sell, buy or merge any business or assets, including to the prospective seller or buyer of such business or assets.

We may share the Personal Data you submit to us with any entity within the TFE Hotels Group worldwide. These entities 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 person 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. By agreeing to this Policy, you consent to the transfer of your Personal Data to a country other than your own.

Whenever we transfer Personal Data across borders, we take legally required steps to ensure that adequate safeguards are in place to protect your Personal Data and to make sure it is treated in accordance with this Policy. If you are located in the EEA, Switzerland or the UK, you can request a copy of the safeguards which we have put in place to protect your Personal Data and privacy rights in these circumstances, by contacting our data protection officer at info@gutte-datenschutz.de.

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

Applicable data privacy laws give rights to individuals in respect of Personal Data that organisations hold about them. If you wish to:

- request 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,

please submit your written request to our data protection officer at info@gutte-datenschutz.de.

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

Questions and complaints

If you have a concern or complaint about how Adina has used your Personal Data, as a first step, you should raise this in writing with Adina, using the address given at the beginning of this Policy or info@adina.eu.

If you are not satisfied with the handling of your concern or complaint by Adina, you can escalate this to your national Data Protection Authority.

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. TFE Hotels 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 TFE Hotels' sites, 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. TFE Hotels 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 e-mail 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)	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.

Last Updated August 2018