

Date: 12.10.26	Author: Tina Schiener	Approval: Iris Müller	☒ public	☐ internal	☐ confidential
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Principles of Data Processing

In the context of this business relationship, personal data is processed by the controller and stored for as long as is necessary to fulfill the defined purposes and statutory obligations. Below, we inform you about which data this concerns, how it is processed, and what rights you have in this regard, in particular with regard to the General Data Protection Regulation (GDPR).

Who is responsible for data processing?

The controller within the meaning of data protection law is (depending on the contractual partner):

Hotelbird GmbH, Plinganserstr. 150, 81369 Munich
Email: info@hotelbird.com, Phone: 089-215380145

You can find further information about our company, details of the persons authorized to represent it, and additional contact options in the legal notice (Impressum) on our website: <https://hotelbird.com/>

Our Data Protection Officer:

We have appointed a data protection officer in our company. You can reach them using the following contact details:

IDKOM Networks GmbH - Data Protection Officer, Dieselstraße 1, 87437 Kempten
Ms. Ilona Bickel, Email: datenschutz@idkom.de, Phone: 0831/59090-400

Purposes of Processing

If we have received data from you, we will in principle only process it for the purposes for which we received or collected it, e.g.

- to fulfill the contract and for contract administration
- for correspondence with you
- to comply with legal and statutory obligations
- to safeguard legitimate interests
- to handle any mutual settlements that may exist

Data processing for other purposes will only be considered if the legal requirements under Art. 6(4) GDPR are met. In that case, we will of course comply with any information obligations under Art. 13(3) GDPR and Art. 14(4) GDPR.

What is the legal basis for this?

The legal basis for the processing of personal data is, in principle – unless there are specific legal provisions – Art. 6 GDPR. The following options come into consideration in particular:

- Consent (Art. 6(1)(a) GDPR)
- Data processing for the performance of contracts (Art. 6(1)(b) GDPR)
Data processing is necessary in particular to ensure the completeness and accuracy of the data and its digitization, and to be able to perform the contract.
- Data processing based on a balancing of interests (Art. 6(1)(f) GDPR)
Data processing is necessary in particular to ensure and optimize informed decisions by the parties involved in your interest, and to ensure a consistently high quality and uniformity of customer advice by the controller.
- Data processing for compliance with a legal obligation (Art. 6(1)(c) GDPR)
Data processing is necessary in particular to ensure the completeness and accuracy of tax data under the German Fiscal Code (Abgabenordnung), the German Trade Regulation Act (Gewerbeordnung), and the German Commercial Code (Handelsgesetzbuch).

If personal data is processed on the basis of your consent, you have the right to **withdraw** your consent at any time with effect for the future. Consent is given voluntarily. Refusing to give consent has no effect on the contractual relationship, unless the processing is necessary for its performance. If we process data on the basis of a balancing of interests, you, as the data subject, have the right to object to the processing of your personal data, taking into account the requirements of Art. 21 GDPR.

Categories of Personal Data

We only process personal data that is necessary to fulfill the defined purposes and statutory obligations. Where applicable, these may include the following categories:

- Contact information such as title, first name, last name, address, email address, telephone numbers
- Other information such as access data, IP address, or payment data

To which recipients is the data disclosed?

Your personal data is, in principle, only disclosed to third parties (e.g. tax advisors, banks, lawyers) if this is necessary for the performance of the contract with you, if disclosure is permissible on the basis of a balancing of interests within the meaning of Art. 6(1)(f) GDPR, if we are legally obliged to disclose it, or if you have given your consent in this regard.

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Transfer of Personal Data to a Third Country

We do not plan to transfer your personal data to a third country or an international organization, unless this is necessary for the performance of the contract with you. Where required by law, you will be informed separately about the details.

How long is the data stored?

We process the data for as long as this is necessary for the respective purpose. Where statutory retention obligations exist – e.g. under commercial or tax law – the relevant personal data is stored for the duration of the retention obligation (10 years). After the retention obligation has expired, we check whether there is any further need to process the data. If processing is no longer necessary, the data is deleted. In exceptional cases, the general storage period for personal data may be up to 30 years, where this is necessary for the establishment, exercise, or defense of legal claims.

Of course, you can at any time (see below) request information about the data we have stored about you and, if processing is no longer necessary, request the deletion of the data or the restriction of processing.

Your Rights as a “Data Subject” - You Have the Right:

- pursuant to Art. 15 GDPR, to obtain information about the personal data we process about you. In particular, you may request information about the purposes of processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing, or objection, the existence of a right to lodge a complaint, the origin of your data if it was not collected from the controller, and the existence of automated decision-making, including profiling and, where applicable, meaningful information about its details;
- pursuant to Art. 16 GDPR, to request without undue delay the rectification of inaccurate personal data or the completion of your personal data stored by the controller;
- pursuant to Art. 17 GDPR, to request the erasure of your personal data stored by the controller, unless the processing is necessary for exercising the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise, or defense of legal claims;
- pursuant to Art. 18 GDPR, to request the restriction of the processing of your personal data where you contest the accuracy of the data, the processing is unlawful but you oppose its erasure, the controller no longer needs the data but you require it for the establishment, exercise, or defense of legal claims, or you have objected to the processing pursuant to Art. 21 GDPR;
- pursuant to Art. 20 GDPR, to receive your personal data that you have provided to the controller in a structured, commonly used, and machine-readable format, or to request its transmission to another controller;
- pursuant to Art. 7(3) GDPR, to withdraw your consent, once given, at any time with the controller. As a result, the controller may no longer continue any data processing that was based solely on that consent in the future, and
- pursuant to Art. 77 GDPR, to lodge a complaint with a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence, your place of work, or the supervisory authority responsible for our registered office.

In the case of an access request that is not made in writing, we ask for your understanding that we may require proof from you that you are the person you claim to be.

Right to Object

In particular, you have the right to object under Art. 21(1) and (2) GDPR to the processing of your data in connection with direct marketing, where this is based on a balancing of interests.

Right to Lodge a Complaint

You have the right to lodge a complaint with a data protection supervisory authority about the processing of personal data by us:

Bayerisches Landesamt für Datenschutzaufsicht (Bavarian State Office for Data Protection Supervision), Promenade 27, 91522 Ansbach
Phone 0981 531300, Fax 0981 53981300, Email: poststelle@lda.bayern.de, Website: www.lda.bayern.de

Necessity of Providing Personal Data

The provision of personal data for the decision on entering into a contract, for the performance of a contract, or for the implementation of pre-contractual measures is voluntary. However, we can only make a decision within the scope of contractual measures if you provide such personal data as is necessary for the conclusion of the contract, the performance of the contract, or pre-contractual measures.

Automated Decision-Making

To establish, fulfill, or carry out the business relationship, and for pre-contractual measures, we do not, in principle, use fully automated decision-making pursuant to Art. 22 GDPR. Should we use such procedures in individual cases, we will inform you separately or obtain your consent, where required by law.