

Privacy policy according to the GDPR

The following privacy policy applies to the use of our online offer kaiser-estate.de (hereinafter referred to as "Website").

We attach great importance to data protection. The collection and processing of your personal data is carried out in compliance with the applicable data protection regulations, in particular the General Data Protection Regulation (GDPR).

1 Person responsible

Person Responsible for the collection, processing and use of your personal data in accordance with Art. 4 No. 7 GDPR: Boris Bronshteyn, managing director of the company Kaiser Estate GmbH, Adolf-Kolping-Str 16, 80336 Munich, Germany, 089416136931, office@kaiser-estate.de

If you wish to object to the collection, processing or use of your data by us in accordance with these data protection provisions, either as a whole or for individual measures, you can address your objection to the person responsible.

You can save and print out this data protection declaration at any time.

2 General purposes of processing

We use personal data for the purpose of operating the website and for securing the travel products of our company booked online.

3 What data we use and why

3.1 Hosting

The hosting services we use serve to provide the following services: Infrastructure and platform services, computing capacity, storage space and database services, security services and technical maintenance services that we use for the purpose of operating the website.

For this purpose, we or our hosting provider process inventory data, contact data, content data, contract data, usage data, meta and communication data of customers, interested parties and visitors of this website on the basis of our legitimate interests in an efficient and secure provision of our website in accordance with Art. 6 Para. 1 S. 1 f) GDPR in conjunction with Art. 28 GDPR.

3.2 Access data

We collect information about you when you use this website. We automatically collect information about your usage pattern and your interaction with us and register data about your computer or mobile device. We collect, store and use data about every access to our website (so-called server log files). This access data includes:

- Name and URL of the accessed file
- Date and time of retrieval
- Data volume transferred
- Message about successful retrieval (HTTP response code)
- Browser type and browser version

- Operating system
- Referer URL (i.e. the previously visited page)
- Websites that are called up by the user's system via our website
- User's internet service provider
- IP address and the requesting provider

We use this log data without allocation to your person or other profiling for statistical evaluations for the purpose of operating, security and optimisation of our website, but also for anonymous recording of the number of visitors to our website (traffic) as well as the extent and type of use of our website and services, as well as for accounting purposes to measure the number of clicks received from cooperation partners. Based on this information, we can provide personalized and location-based content and analyze traffic, troubleshoot and correct errors and improve our services.

This is also our legitimate interest according to Art 6 Paragraph 1 S. 1 f) GDPR.

We reserve the right to subsequently check the log data if there is a justified suspicion of illegal use based on concrete evidence. We store IP addresses in the log files for a limited period of time if this is necessary for security purposes or if it is necessary for the provision of services or the invoicing of a service, e.g. if you use one of our offers. After cancellation of the order process or after receipt of payment, we delete the IP address if it is no longer required for security purposes. We also store IP addresses if we have concrete suspicion of a criminal offence in connection with the use of our website. We also save the date of your last visit (e.g. when registering, logging in, clicking on links etc.) as part of your account.

3.3 Cookies

We use cookies to optimize our website. A cookie is a small text file that is sent by the respective servers when you visit a website and is temporarily stored on your hard drive. This file as such contains a so-called session ID with which various requests from your browser can be assigned to the shared session. This enables your computer to be recognised when you return to our website. These cookies are deleted after you close your browser. They serve, for example, to enable you to use the shopping basket function over several pages.

We also use persistent cookies (also small text files that are stored on your terminal device) to a small extent, which remain on your terminal device and enable us to recognize your browser the next time you visit us. These cookies are stored on your hard drive and delete themselves after the specified time. Their lifetime is 1 month. This enables us to present our offer to you in a more user-friendly, effective and secure manner and, for example, to display information on the site that is specially tailored to your interests.

Our legitimate interest in the use of cookies in accordance with Art 6 Paragraph 1 Sentence 1 f) GDPR is to make our website more user-friendly, more effective and safer.

The following data and information are stored in the cookies:

- Log-in information
- Information about the number of times our website is called up and the use of individual functions of our Internet presence.

When the cookie is activated, it is assigned an identification number and your personal data is not assigned to this identification number. Your name, your IP address or similar data that would allow the cookie to be assigned to you will not be placed in the cookie. On the basis of cookie technology, we only receive

pseudonymized information, for example about which pages of our portal have been visited, which products have been viewed, etc.

You can set your browser so that you are informed in advance about the setting of cookies and can decide in each individual case whether you want to exclude the acceptance of cookies for certain cases or generally, or whether cookies should be prevented completely. This may limit the functionality of the website.

3.4 Data for the fulfilment of our contractual obligations

We process personal data that we need to fulfil our contractual obligations, such as name, address, e-mail address, ordered products, invoice and payment data. The collection of this data is necessary for the conclusion of the contract.

The data will be deleted after expiry of the warranty periods and statutory retention periods. Data that is linked to a user account (see below) is retained in any case for the time that this account is maintained.

The legal basis for the processing of this data is Art. 6 para. 1 sentence 1 b) GDPR, because this data is required to enable us to fulfil our contractual obligations towards you.

3.5 User account

You can create a user account on our website. If you wish to do so, we need the personal data requested during login. When you log in later, only your email or user name and the password you have chosen are required.

For the new registration we collect master data (e.g. name, address), communication data (e.g. e-mail address) and payment data (bank details) as well as access data (user name and password).

To ensure your proper registration and to prevent unauthorized logins by third parties, you will receive an activation link by e-mail after your registration to activate your account. Only after successful registration do we permanently store the data you provide in our system.

You can have a user account, once created, deleted by us at any time without incurring any costs other than the transmission costs according to the basic rates. A message in text form to the contact data mentioned under point 1 (e.g. e-mail, fax, letter) is sufficient for this purpose. We will then delete your stored personal data, unless we still need to store them for the processing of orders or due to legal storage obligations.

The legal basis for the processing of this data is your consent in accordance with Art. 6 para. 1 sentence 1 a) GDPR.

3.6 Newsletter

To register for the newsletter, the data requested in the registration process are required. The registration for the newsletter is logged. After registering, you will receive a message at the specified email address asking you to confirm your registration ("double opt-in"). This is necessary to prevent third parties from registering with your email address.

You can revoke your consent to receive the newsletter at any time and thus cancel the newsletter.

We store the registration data as long as they are needed to send the newsletter.

We store the registration protocol and the shipping address as long as there was an interest in the proof of the originally given consent, as a rule these are the limitation periods for civil law claims, thus a maximum of three years.

The legal basis for the dispatch of the newsletter is your consent in accordance with Art. 6 para. 1 sentence 1 a) in conjunction with Art. 7 GDPR in conjunction with § 7 para. 2 no. 3 UWG. The legal basis for the logging of the registration is our legitimate interest in proof that the dispatch was carried out with your consent.

You can cancel the registration at any time without incurring any costs other than the transmission costs according to the basic rates. A message in text form to the contact data mentioned under point 1 (e.g. e-mail, fax, letter) is sufficient for this purpose. Of course you will also find an unsubscribe link in every newsletter.

3.7 Product recommendations

We will send you regular travel product recommendations by e-mail, independently of the newsletter. In this way, we send you information about travel products from our range that you may be interested in based on your recent purchases of goods or services from us. In doing so, we comply strictly with the legal requirements. You can object to this at any time without incurring any costs other than the transmission costs according to the basic rates. A message in text form to the contact data mentioned under point 1 (e.g. e-mail, fax, letter) is sufficient for this purpose. Of course you will also find an unsubscribe link in every e-mail.

The legal basis for this is the legal permission according to Art. 6 para. 1 sentence 1 f) GDPR in conjunction with § 7 para. 3 UWG (law against unfair competition).

3.8 E-Mail Contact

If you contact us (e.g. via contact form or e-mail), we will process your data to process the enquiry and in the event that follow-up questions arise.

If the data processing is carried out to carry out pre-contractual measures which are carried out in response to your enquiry or, if you are already our customer, to carry out the contract, the legal basis for this data processing is Art. 6 para. 1 sentence 1 b) GDPR.

We only process other personal data if you give your consent (Art. 6 para. 1 p. 1 a) GDPR) or if we have a legitimate interest in processing your data (Art. 6 para. 1 p. 1 f) GDPR). A legitimate interest lies, for example, in replying to your e-mail.

4 Google Analytics

We use Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website is usually transferred to a Google server in the USA and stored there.

This is also our legitimate interest according to Art 6 Paragraph 1 S. 1 f) GDPR.

Google has subjected itself to the Privacy Shield Agreement concluded between the European Union and the USA and has been certified. As a result, Google has undertaken to comply with the standards and regulations of European data protection law. You can find more detailed information in the following linked entry: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>.

We have activated IP anonymization on this website. However, this will cause your IP address to be shortened by Google within member states of the European Union or in other states that are parties

to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. On our behalf, Google will use this information to evaluate your use of the website, to compile reports on website activities and to provide us with further services related to website and internet use.

The IP address transmitted by your browser within the scope of Google Analytics is not merged with other Google data. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

You can also prevent the transfer of the data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available under the following link:
<http://tools.google.com/dlpage/gaoptout?hl=de>.

As an alternative to the browser plugin or within browsers on mobile devices, you can click on the following link to set an opt-out cookie that will prevent Google Analytics from collecting data within this website in the future (this opt-out cookie only works in this browser and only for this domain. If you delete the cookies in your browser, you will have to click this link again): to deactivate Google Analytics [<https://support.google.com/analytics/answer/6004245?hl=de>]

5 Storage period

Unless specifically stated, we only store personal data for as long as this is necessary to fulfil the purposes pursued.

In some cases, the legislator provides for the retention of personal data, for example in tax or commercial law. In these cases, we will only continue to store the data for these legal purposes, but will not process it in any other way and delete it after the legal retention period has expired.

6 Your rights as a person affected by the data processing

Under applicable laws, you have various rights regarding your personal information. If you wish to exercise these rights, please send your request by e-mail or by post, clearly identifying yourself, to the address mentioned in point 1.

Below you will find an overview of your rights.

6.1 Right to confirmation and information

You have the right to receive clear information about the processing of your personal data.

In detail:

You have the right to obtain confirmation from us at any time as to whether personal data concerning you is being processed. If this is the case, you have the right to request from us, free of charge, information about the personal data stored about you, together with a copy of this data. Furthermore, you have the right to receive the following information:

1. the processing purposes;
2. the categories of personal data processed;

3. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular those in third countries or international organizations;
4. if possible, the planned duration for which the personal data will be stored or, if not the criteria for determining that duration;
5. the existence of a right to rectify or erase personal data concerning you; or the restriction of the processing by the controller or the right to object to it Processing;
6. the existence of a right of appeal to a supervisory authority;
7. if the personal data are not collected from you, all available information on the Origin of the data;
8. the existence of automated decision-making, including profiling, in accordance with Art. 22, paras. 1 and 4 GDPR and - at least in these cases - meaningful information about the logic involved and the The scope and intended effects of such processing for you.

If personal data is transferred to a third country or to an international organisation, you have the right to be informed of the appropriate guarantees in accordance with Art. 46 GDPR in connection with the transfer.

6.2 Right of rectification

You have the right to ask us to correct and, if necessary, complete personal data concerning you.

In detail:

You have the right to ask us to correct incorrect personal data concerning you without delay. Taking into account the purposes of the processing, you have the right to request the completion of incomplete personal data, including by means of a supplementary declaration.

6.3 Right of deletion ("right to be forgotten")

In a number of cases we are obliged to delete personal data concerning you.

In detail:

Pursuant to Art. 17 para. 1 GDPR, you have the right to demand that we delete personal data relating to you without delay and we are obliged to delete personal data relating to you without delay if one of the following reasons applies:

1. The personal data are no longer necessary for the purposes for which they were collected or otherwise processed.
2. You revoke your consent on which the processing was based in accordance with Art. 6 para. 1 sentence 1 a) GDPR or Art. 9 para. 2 a) GDPR and there is no other legal basis for the processing.
3. You object to the processing pursuant to Art. 21 para. 1 GDPR and there are no overriding legitimate reasons for the processing, or you object to the processing pursuant to Art. 21 para. 2 GDPR.
4. The personal data have been processed unlawfully.
5. The deletion of personal data is necessary to comply with a legal obligation under Union law or the law of the Member States to which we are subject.
6. The personal data has been collected in relation to the information society services offered, in accordance with art. 8 paragraph 1 GDPR.

If we have made the personal data public and are obliged to delete them in accordance with Art. 17 para. 1 GDPR, we shall take reasonable measures, including technical measures, taking into account

the available technology and the implementation costs, to inform data controllers who process the personal data that you have requested them to delete all links to these personal data or copies or replications of these personal data.

6.4 Right to limit processing

In a number of cases, you are entitled to ask us to restrict the processing of your personal data.

In detail:

You have the right to request us to restrict processing if one of the following conditions is met:

1. the correctness of the personal data is disputed by you for a period of time that allows to verify the accuracy of personal data,
2. the processing is unlawful and you refused to delete the personal data and instead have requested the restriction of the use of personal data;
3. we no longer need the personal data for the purposes of the processing, but you have requested the data for require assertion, exercise or defence of legal claims, or
4. you have lodged an objection to the processing pursuant to Art. 21 para. 1 DSGVO, as long as it is established whether the justified reasons of our company outweigh yours.

6.5 Right to data transferability

You have the right to receive, transmit, or have us transmit personal data concerning you in machine-readable form.

In detail:

You have the right to receive the personal data concerning you which you have provided us with in a structured, common and machine-readable format and you have the right to transfer this data to another person in charge without hindrance by us, provided that

1. the processing is based on a consent pursuant to Art. 6 para. 1 sentence 1 a) GDPR or Art. 9 para. 2 a) GDPR or is based on a contract pursuant to Art. 6 para. 1 sentence 1 b) GDPR and
2. the processing is carried out using automated procedures.

When exercising your right to data transfer in accordance with paragraph 1, you have the right to obtain that the personal data be transferred directly from us to another controller, insofar as this is technically feasible.

6.6 Right of objection

You have the right to object to the lawful processing of your personal data by us if this is justified by your particular situation and if our interests in the processing do not outweigh the processing.

In detail:

You have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6 paragraph 1 sentence 1 e) or f) of the GDPR;

this also applies to profiling based on these provisions. We no longer process personal data unless we can prove compelling reasons for processing that are worthy of protection and outweigh your interests, rights and freedoms, or unless the processing serves to assert, exercise or defend legal claims.

Where personal data are processed by us 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, including profiling, insofar as it relates to such direct marketing.

You have the right to object, for reasons arising from your specific situation, to the processing of personal data concerning you for the purposes of scientific or historical research or for statistical purposes, in accordance with Article 89, paragraph 1, GDPR, unless the processing is necessary for the performance of a task carried out in the public interest.

6.7 Automated decisions including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal effect on you or which significantly affects you in a similar way.

No automated decision making based on the personal data collected will take place.

6.8 Right to revoke a data protection consent

You have the right to revoke your consent to the processing of personal data at any time.

6.9 Right to complain to a supervisory authority

You have the right to complain to a supervisory authority, in particular in the Member State of your residence, place of work or place of the alleged infringement, if you consider that the processing of personal data concerning you is unlawful.

7 Data security

We make every effort to ensure the security of your data within the framework of the applicable data protection laws and technical possibilities.

Your personal data will be transmitted encrypted. This applies to your orders and also to the customer login. We use the SSL (Secure Socket Layer) coding system, but we would like to point out that data transmission on the Internet (e.g. when communicating by e-mail) can have security gaps. A complete protection of data against access by third parties is not possible.

To protect your data, we maintain technical and organizational security measures in accordance with Art. 32 GDPR, which we continually adapt to the state of the art.

We also do not guarantee that our offer is available at certain times; disturbances, interruptions or failures cannot be excluded. The servers used by us are regularly and carefully secured.

8 Transfer of data to third parties, no data transfer to non-EU countries

As a matter of principle, we only use your personal data within our company.

If and to the extent that we involve third parties in the performance of contracts (such as logistics service providers), they will only receive personal data to the extent that the transmission is necessary for the corresponding service.

In the event that we outsource certain parts of the data processing ("contract processing"), we contractually oblige contract processors to use personal data only in accordance with the requirements of the data protection laws and to ensure the protection of the rights of the data subject.

Data transmission to bodies or persons outside the EU outside the case mentioned in this declaration in section 4 does not take place and is not planned.

9 Data Protection Officer

Should you have any further questions or concerns regarding data protection, please contact our data protection officer:

Boris Bronshteyn, Managing Director of Kaiser Estate GmbH, Adolf-Kolping-Str 16, 80336 Munich, 089416136931, office@kaiser-estate.de