

## **PRIVACY POLICY for the visitors of our website**

*(Last updated: August 2021)*

**Addendum:** For legal purposes, the original Datenschutzerklärung / privacy policy is considered the legally binding version and prevails in the case of legal disputes. The English translation is provided for informational purposes only and is not legally binding.

Hello and thank you for your interest in our website. Among other things, we take your rights to privacy, data protection and informational self-determination very seriously. Therefore, we would like to inform you about the following:

### **Who we are?**

NTI Nordic Travel Incoming GmbH  
Friedrich-Wilhelm-Platz 7  
12161 Berlin  
Germany  
T +49 (0)30 587 646 719  
F +49 (0)30 587 646 713  
[info@nti-berlin.de](mailto:info@nti-berlin.de)

### **Who is responsible for data protection at our company (data protection officer)?**

Mr Gregor Klar: [privacy@nti-berlin.de](mailto:privacy@nti-berlin.de)

### **What happens during purely informational purpose of the website?**

If you use our website purely for information purposes, i.e. if you do not register as a user or otherwise transmit information, we collect the following data from you: IP address, date and time of the request, time zone difference to Greenwich Mean Time (GMT), content of the request (specific page), access status/HTTP status code, amount of data transferred in each case, website from which the request comes, browser, operating system and its interface, language and version of the browser software. We receive this data via cookies and directly from your browser. The purpose of this processing is the provision of our website as well as statistical evaluation. The legal basis for this is Article 6(1) sentence 1 lit. f DSGVO, according to which the processing of personal data is also possible without the consent of the data subject if the processing is necessary for the protection of the legitimate interests of the controller or a third party, unless the interests or fundamental rights and freedoms of the data subject which require the protection of personal data override these, in particular if the data subject is a child. The aforementioned purposes are in our interest. Insofar as we use cookies, we refer to our explanations under "How do we use cookies on this website?".

### **What happens when I use the contact field?**

If you communicate with us via our contact field, we collect the following data: E-mail address. Only you know the reasons for contacting us; the reaction to this describes the purpose of the processing. Insofar as it concerns a concrete contractual relationship, be it in connection with the initiation, implementation or termination, the legal basis for the processing is Article 6 (1) lit. b DSGVO. In this case, we store the data until the end of the statutory retention period. In all other cases, the legal basis is Article 6(1) sentence 1 lit. f DSGVO, according to which the processing of personal data is possible even without the consent of the data subject if the processing is necessary to protect the legitimate interests of the controller or a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular if the data subject is a child. Communication outside of a debt relationship is in our mutual interest. We store your data until the purpose deriving from the legitimate interest is fulfilled.

## How do we use Google Analytics?

(1) This 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 cookie about your use of this website 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, your IP address will be truncated beforehand by Google 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. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The legal basis is Article 6(1) sentence 1 lit. f DSGVO, Article 6(1) sentence 1 lit. f DSGVO, according to which the processing of personal data is also possible without the consent of the data subject if the processing is necessary to protect the legitimate interests of the controller or a third party, unless such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child. Our legitimate business interest is to evaluate user behaviour on this website. Your interests are protected by your avoidance options, which we describe later, and anonymisation. We have also concluded an order processing agreement with the provider, thus ensuring our right to issue instructions to the provider. We delete the data after 14 months at the latest.

(2) The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

(3) 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. In addition, you can prevent the collection of the data generated by the cookie and related to your use of the website (incl. your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available at the following link:  
<http://tools.google.com/dlpage/gaoptout?hl=de>.

(4) This website uses Google Analytics with the extension "\_anonymizeIp()". This means that IP addresses are processed in a shortened form, thus excluding the possibility of personal references. If the data collected about you is related to a person, this is immediately excluded and the personal data is deleted immediately.

(5) We use Google Analytics to analyse and regularly improve the use of our website. The statistics obtained enable us to improve our offer and make it more interesting for you as a user. For the exceptional cases in which personal data is transferred to the USA, Google has submitted to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

(6) Information from the third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. User conditions:  
<http://www.google.com/analytics/terms/de.html>, Data protection overview:  
<http://www.google.com/intl/de/analytics/learn/privacy.html>, and the privacy policy:  
<http://www.google.de/intl/de/policies/privacy>.

(7) This website also uses Google Analytics for a cross-device analysis of visitor flows, which is carried out via a user ID. You can deactivate the cross-device analysis of your usage in your customer account under "My data", "Personal data".

## How do we deal with social networks?

(1) We do not currently use social media plug-ins. Nevertheless, we have linked our company pages and/or fan pages on our site with regard to these social networks. Facebook, Xing, LinkedIn. If you click on these links, contact will be established with these providers. If you are logged in, you will be taken to our respective company page and/or fan page.

(2) We have neither influence on the collected data and data processing procedures, nor are we aware of the full extent of the data collection, the purposes of the processing, the storage periods. We also have no information on the deletion of the collected data by the respective provider.

(3) Der jeweilige Anbieter speichert die über Sie erhobenen Daten als Nutzungsprofile und nutzt diese für Zwecke der Werbung, Marktforschung und/oder bedarfsgerechten Gestaltung seiner Website. Eine solche Auswertung erfolgt insbesondere (auch für nicht eingeloggte Nutzer) zur (3) The respective provider stores the data collected about you as usage profiles and uses these for the purposes of advertising, market research and/or demand-oriented design of its website. Such an evaluation is carried out in particular (also for users who are not logged in) for the display of needs-based advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of these user profiles, whereby you must contact the respective provider to exercise this right. Via the plug-ins, we offer you the opportunity to interact with the social networks and other users so that we can improve our offer and make it more interesting for you as a user.

(4) The data transfer takes place regardless of whether you have an account with the provider and are logged in there. If you are logged in to the plug-in provider, the data we collect is directly assigned to your account with the provider. If you click the activated button and, for example, link to the page, the plug-in provider also saves this information in your user account and shares it publicly with your contacts. We recommend that you log out regularly after using a social network, but especially before activating the button, as this will help you avoid being assigned to your profile with the plug-in provider.

(5) Further information on the purpose and scope of the data collection and its processing by the provider can be found in the data protection declarations of these providers communicated below. There you will also receive further information on your rights in this regard and setting options for protecting your privacy.

(6) The legal basis is Article 6(1) sentence 1 lit. f DSGVO, Article 6(1) sentence 1 lit. f DSGVO, according to which the processing of personal data is also possible without the consent of the data subject if the processing is necessary to protect the legitimate interests of the controller or a third party, unless the interests or fundamental rights and freedoms of the data subject, which require the protection of personal data, override these interests, in particular if the data subject is a child. Our legitimate business interest is to give you the opportunity to interact with us voluntarily on social networks - as described here.

(7) Addresses of the respective plug-in providers and URL with their data protection notices:

a) Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA;

<http://www.facebook.com/policy.php>; further information on data collection:

<http://www.facebook.com/help/186325668085084>, <http://www.facebook.com/about/privacy/your-info-on-other#applications> sowie <http://www.facebook.com/about/privacy/your-info#everyoneinfo>. Facebook has submitted to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

b) Xing AG, Gänsemarkt 43, 20354 Hamburg, DE; <http://www.xing.com/privacy>.

c) LinkedIn Corporation, 2029 Stierlin Court, Mountain View, California 94043, USA;

<http://www.linkedin.com/legal/privacy-policy>. LinkedIn has submitted to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

#### **Are we obliged to collect this data? What happens if we do not collect this data?**

There is no legal obligation to collect this data. However, there is a possibility that failure to collect it may make it more difficult for you to visit our website.

#### **To whom do we transfer the data? And: Does the data leave the European Union or the European Economic Area?**

The following companies receive the above data, indicating below if the data leave the European Union or the European Economic Area:

Third country reference:

Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA;

<http://www.facebook.com/policy.php>; weitere Informationen zur Datenerhebung:

<http://www.facebook.com/help/186325668085084>, <http://www.facebook.com/about/privacy/your-info-on-other-applications> as well as <http://www.facebook.com/about/privacy/your-info-everyoneinfo>.

- Google Inc., 1600 Amphitheater Parkway, Mountainview, California 94043, USA; <https://www.google.com/policies/privacy/partners/?hl=de>.
- LinkedIn Corporation, 2029 Stierlin Court, Mountain View, California 94043, USA; <http://www.linkedin.com/legal/privacy-policy>. LinkedIn has submitted to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

Other:

- Xing AG, Gänsemarkt 43, 20354 Hamburg, DE; <http://www.xing.com/privacy>.
- Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001 (Google Analytics)

#### **Do we guarantee sufficient data security?**

We maintain up-to-date technical measures to ensure data security, in particular to protect your personal data from risks during data transmission and from third parties gaining knowledge. These are adapted to the current state of the art.

#### **How do we use cookies on this website?**

Furthermore, cookies are stored on your computer when you use the website. Cookies are small text files that are stored on your hard drive in relation to the browser you are using and which provide the party setting the cookie (in this case, us) with certain information. Cookies cannot execute programs or transmit viruses to your computer. They serve to make the internet offer as a whole more user-friendly and effective.

#### **We use a newsletter on our website.**

In order to receive the newsletter offered on our website, you can register via our form. We use the so-called double opt-in procedure. Here, a confirmation email is first sent to the email address you provided, with a request for confirmation. The registration only becomes effective when you click on the activation link contained in the confirmation email. We use your data transmitted to us exclusively for sending the newsletter, which may contain information or an offer. We use rapidmail to send our newsletter. Your data will therefore be transmitted to rapidmail GmbH. In doing so, rapidmail GmbH is prohibited from using your data for purposes other than sending the newsletter. The rapidmail GmbH is not permitted to pass on or sell your data. rapidmail is a German, certified newsletter software provider, which has been carefully selected in accordance with the requirements of the DSGVO and the BDSG.

You can revoke your consent to the storage of data and its use for newsletter dispatch at any time, e.g. via the unsubscribe link in the newsletter.

#### **How do we handle personal data?**

In order to offer and provide our services based on a customer request, we need to share personal data with providers of the customer's travel services, e.g. transport companies, hotels or similar accommodation providers, restaurants and activity providers. We only collect, use and disclose your personal data if this is necessary for the performance of the contract and permitted by law, or if you have consented to the collection of the data. Personal data is only processed and stored for the

period of time required to achieve the storage purpose or if this is provided for by law. The collected data will be deleted or blocked as soon as the purpose of the data collection ceases to apply or the end of the legal storage period has been reached. The legal basis for the lawful processing of personal data by us is regulated in Art. 6 (1) DSGVO:

- The data subject has given us their consent to process the data concerning them for a specific purpose. Here, Art. 6 (1) lit. a DSGVO applies.
- The processing is necessary for the performance of a contract with the data subject (e.g. booking a travel service). The same applies to processes that are necessary for the implementation of pre-contractual measures (e.g. for processing a travel enquiry). Here, Art. 6 (1) lit. b DSGVO applies.
- As a company, we are subject to legal obligations that require us to process personal data. These include, for example, the fulfilment of tax obligations. This is where Art. 6 (1) lit. c. DSGVO.
- Processing is carried out on the basis of legitimate interests of our company or a third party. This may include marketing interests, provided these do not conflict with the interests, fundamental rights and freedoms of the data subject. This is where Art. 6 (1) lit. f. DSGVO.

#### **What rights do you have?**

You have some rights. You have the right to information about the personal data processed about you, as well as to correction or deletion, to restriction of processing, to object to processing and to data portability. Furthermore, you have the possibility to complain about us to the supervisory authority responsible for us. We would like to point out that these rights may be subject to conditions, which we will insist on.