

Data Protection Notice for Booking Hotel Rooms For CHIO Aachen

The aachen tourist service e.v. (ats) is the official hotel agency partner of CHIO Aachen. Below, we would like to explain to you, which data we collect about you and what we do with these data. We also inform you about your privacy rights and explain to whom you can turn with questions about data protection.

1. Data controller (responsible for data processing):

aachen tourist service e.v.
Markt 45-47
52062 Aachen
phone: +49 241 18029-0
fax: +49 241 18029-30
email: info@aachen-tourismus.de

Representatives:
board of management: Katrin Hissel, Caroline Noerenberg
chairman of the supervisory board: Harald Baal

Concerning questions about this Data Protection Notice, processing of your data, your rights or other data protection topics, our data protection officer (DPO) would be pleased to help you.

Contact details of our data protection officer:

Xamit Bewertungsgesellschaft mbH
Monschauer Straße 12
40549 Düsseldorf
info@xamit.de

2. Data Sources

We will receive your data from the Federation responsible for you or from the Aachen-Laurensberger Rennverein e.V. (ALRV) to book a hotel room for you during the CHIO Aachen.

3. Processed Data, Processing Purposes and Legal Bases

We process your data for booking a hotel room. The following data will be processed and passed on to the hotel for room booking.

If the hotel room is paid by the Aachen-Laurensberger Rennverein e.V.:

- First and last name

In addition (when you are a direct payer):

- Arrival and departure date
- Number of adults
- Special requests (your personal requests)
- Form of address
- Address
- email address
- Phone/mobile number
- Country

The Aachen-Laurensberger Rennverein e.V. receives a booking confirmation from us, or you will receive this confirmation if you are a direct payer.

In case of inquiries, we will also process your data for communication.

The legal basis for the processing of your data is:

- if the Aachen-Laurensberger Rennverein e.V. pays for the hotel room: fulfilling our legitimate interest in arranging a hotel room and fulfilling your request for a room on the basis of a balance of interests (Art. 6 (I) f) GDPR).
- if you are a direct payer: the initiation of a contractual relationship between you and the hotel (Art. 6 (I) b) GDPR).

4. Other Processing Purposes

In addition, the above-mentioned data are used for the following purposes in the context of a balance of interests (Art. 6 (I) (f) GDPR). The interests are described below:

1. As it is in our interest to ensure the security of our systems, we regularly conduct security and efficiency tests that allow us to process your above-mentioned data.
2. Should a security incident occur in our company that affects your data, we are obliged to report the case to our data protection supervisory authority (Article 33 GDPR). Since our legitimate interest is to comply with this statutory reporting obligation as quickly as possible, it may happen that in the context of the investigation of the corresponding security incident data about you are processed. Reports of these security incidents to data protection supervisory authorities do not contain any of your personal data.
3. We perform (internal) audits and other control activities (e.g. data protection officer's monitoring activities), because it is our legitimate interest to comply with legal provisions, to obtain transparency about our business processes, to constantly optimise these processes and to prevent and identify harmful acts against our business. In doing so, documents or data sets with your personal data may be processed.
4. We perform internal and external audits for the acquisition and retention of certifications, as well as for the compliance with our customer's requirements and quality standards. Furthermore, our customers or external sources perform their own audits. In doing so, documents which contain your personal data may be processed.
5. We process your data for purposes of managing our company, for identification and persecution of financial risks, for concentrating our sales activities and for fulfilment of (contractual) obligations regarding our customers. For that purpose, the processed data will be used for the creation of reports and for evaluation. The processing takes place for protecting our legitimate interests in company and sales management as well as for fulfilment of our obligations regarding our customers.
6. For meeting our tax-law obligations, we engage tax counsellors. Furthermore, we engage financial auditors for meeting our duty of auditing the financial statements according to § 316 (1) Commercial Code (or German "Handelsgesetzbuch", short HGB). Finally, as it is our legitimate interest to cooperate with auditors from tax authorities in order to prove the correct invoicing and financial statements. Documents which are regarded for these purposes may contain your personal data.
7. Since it is our interest to solve legal disputes, we process your data in that specific case. It is also in our interest, in the event of litigation, to keep evidence until all relevant statutory limitation periods pursuant according to sections 195ff. of the German Civil Code, have expired. For this purpose, we retain the relevant data about you in accordance with these limitation periods. The retention periods cannot be globally predicted, since they depend on the particular matter in dispute and the respective statutory limitation period, which can be up to 30 years. The regular limitation period is three years.
8. In addition, it is in our interest to investigate suspected cases and to hand over relevant information to law enforcement authorities in case of a specific criminal suspicion.

9. Errors can occur to anyone and in any organisational process and system. In order to optimise our processes and minimising our error rate, we process the data which are available to our company for identifying sources of error. The processing takes place in order to protect our legitimate interests in the improvement of our processes.
10. For the purpose of promotion and funding management, we process data in order to apply for and bill subsidies, for the compliance with legal statistics requirements, and for business-management controls. For that purpose, we have to provide our external sources with evidence for the use of subsidies and personnel.
11. We process your data for testing IT systems and software products and for migrations. The processing is necessary for satisfying our legitimate interest in evaluating if new products are correct and if migrations are complete.
12. We maintain a black list, which lists former customers or prospects whom we no longer wish to begin business relations with. For example, repeated payment failures as well as contract-abusive, deceitful or business-damaging behaviour count to the reasons. The processing occurs in line with the freedom of contract for the protection of our legitimate interest in protecting our company against financial damages or defamation.

5. Deletion Periods

We process your data for as long as it is necessary for the fulfilment of the stated purposes.

In the ALRV's system that is used to transfer personal data to the ats, the data are deleted annually. Direct Payers' data which are being processed in the invoicing process will be deleted after 11 years with the end of archiving of the annual financial statements. The deadline is determined by statutory retention periods.

For the preservation of evidence, we retain data in accordance with the statutory limitation periods according to sections 195 and following of the German Civil Code. The storage duration of your data may exceed the duration stated above. The statutory limitation periods can be up to 30 years. The normal limitation period is 3 years.

6. Who Receives Your Data?

The following list shows which organisations ("data recipients") receive your data in which cases. You can read about the specific data in the corresponding sections of this data protection notice. Transfer of your data may sometimes occur due to contractual or legal requirements. In other cases, we use selected vicarious agents and service providers who work for us as commissioned data processors (in accordance with Art. 28 GDPR) and may obtain access to your data in the required scope. Commissioned data processors are subject to numerous contractual obligations and may, in particular, process your personal data only on our instructions and solely for the fulfilment of the orders received from us.

- Aachen-Laurensberger Rennverein e.V. (ALRV)
- Auditors
- Data Protection Officer
- Service providers for mass file destruction
- Service providers for operating the booking platform
- Recipient's e-mail provider
- Tax authorities
- Courts, lawyers, authorities, business partners, claim opponents, law enforcement authorities, opposing lawyers, state or federal criminal police (for legal disputes or actual suspicious cases)
- Hotels

- IT service providers
- External sources
- Tax counsellors
- Service providers for telecommunication
- Mailing services
- Financial auditors

7. Data Recipients in Non-EU Countries

If you are a direct payer from a country outside the EU (so-called third country), the booking confirmation will be transferred to that country. The transfer of your data is necessary in order to fulfil the contract with you (Art. 49 (l) b) GDPR) and takes place to process your hotel booking. We would like to point out that the level of data protection in third countries without an adequacy decision by the EU Commission may differ from the European level of data protection. According to the adequacy decision of the EU Commission, the level of data protection in the following third countries is adequate: Andorra, Argentina, Faroe Islands, Guernsey, Isle of Man, Israel, Japan, Jersey, Canada (restricted), New Zealand, South Korea, Switzerland, Uruguay, United Kingdom (status as of 25 February 2023).

Our IT service providers in the EU have affiliates or subcontractors outside the EU that can access your data. The EU Commission determines which non-EU/EEA countries (third countries) have an adequate level of data protection. The affiliated companies or subcontractors of our IT service providers have either submitted to the so-called Data Privacy Framework (Decision No. C(2923) 4745 final of July 10, 2023) if they have their registered office in the USA; otherwise, our IT service providers are responsible for the use of EU standard contractual clauses in accordance with Commission Decision No. (EU) 2021/914. A model of these EU standard contractual clauses can be found on the websites of the EU Commissioner for Justice and in the Official Journal of the EU.

8. Your Rights

You have the legal right to:

- **Access** to your personal data that we process (Art. 15 GDPR)
- **Rectification and completion** of your data (Art. 16 GDPR)
- **Erase** (Art. 17 GDPR)
- **Restriction of processing** (Art. 18 GDPR)
- **Data portability** (Art. 20 GDPR)
- **Withdrawal of your consent** (Art. 7 GDPR) with effect for the future. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.
- You also have the right to **object** to the processing of your data which is based on our legitimate interests or the legitimate interests of a third party at any time, on grounds relating to your particular situation (Art. 21 GDPR). This also applies to profiling based on these provisions within the meaning of Art. 4 (4) GDPR.
- **Objection to direct marketing** – You have the right to object to the processing of your data for the purpose of direct marketing at any time without giving reasons.

To exercise these rights, you can contact us via the contact details mentioned above.

You also have the legal right to lodge a complaint with a data protection supervisory authority (Art. 77 GDPR).