

# Data Protection Information for Business Partners

In accordance with Article 13 GDPR

Data protection is an important concern for us. In the following we will inform you, our business partners, on how we collect, store and process your personal data at Radurlaub Zeitreisen GmbH and which rights you have in accordance with the specifications of the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (Bundesdatenschutzgesetzes - BDSG-neu). By business partner we mean our contact person for interested parties, customers, sales partners, suppliers and general partners; hereinafter collectively referred to as "business partner".

This data protection notice for all products and services offered applies to all companies associated with Radurlaub Zeitreisen GmbH (see point 6). Services and offers which have their own data protection notice are excluded.

This data protection declaration applies in addition to our existing general data protection declaration, in which you can find concrete information on how we process your personal data when visiting our website or in the case of other specific matters.

## 1. Person responsible and data protection officer

The person (from here on to be referred to as "company") responsible for the processing of your personal data is:

Klaus Schenk  
Radurlaub Zeitreisen GmbH  
Max-Stromeyerstrasse 57  
78467 Konstanz  
Telephone: +49 7531 361860  
E-Mail: schenk@inselhuepfen.de

Our data protection officer can be reached by post or email:

Wolfgang Homann  
c/o bbcom secure Deutschland GmbH  
Reichenaustraße 11  
78467 Konstanz  
E-Mail: datenschutz.radurlaub@bbcomsecure.de

## 2. For what purpose do we process you data?

In the context of cooperation with business partners, Radurlaub Zeitreisen GmbH processes personal data for the following purposes:

- Initiation or implementation of a contractual relationship or the implementation of pre-contractual measures;
- Communication with business partners about products, services, and projects, for example, to process inquiries and orders from the business partner;
- Planning, execution and management of the (contractual) business relationship between Radurlaub Zeitreisen GmbH and the business partner, for example, in order to process the ordering of products and services, to collect payments, for accounting purposes, billing and accounts receivable collection and to carry out deliveries, maintenance activities or repairs;
- Conducting customer surveys, marketing campaigns, market analyses, prize competitions, contests or similar actions and events;
- Maintenance and protection of the security of our products and services, and websites,
- Compliance with legal requirements (e.g. tax and commercial law retention obligations), existing obligations to carry out compliance screenings (to prevent white-collar crime or money laundering) and to comply with Radurlaub Zeitreisen GmbH guidelines and industry standards;
- Prevention and detection of security risks, fraudulent actions or other criminal or malicious acts;
- Settlement of legal disputes, enforcement of existing contracts and the assertion, exercise and defence of legal claims.

## 3. What is the legal basis on which we process your data?

We process your personal data in accordance with the regulations of the European General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG-neu). The processing of your data is lawful in accordance with

Article 6 (1) (b) GDPR insofar as this is necessary for the establishment, execution and fulfilment of a contract as well as for the implementation of pre-contractual measures.

If you give us your express consent to process personal data for specific purposes (e.g. disclosure to third parties, evaluation for marketing purposes or advertising), the lawfulness of this processing is given on the basis of your consent pursuant to Article 6 para. 1 lit. a GDPR. Given consent can be revoked at any time, with prospective effect.

If necessary and legally permissible, we process your data beyond the actual contractual purposes to fulfil legal obligations in accordance with Article 6 para. 1 lit. c GDPR. In addition, your data may be processed to protect the legitimate interests of us or third parties pursuant to Article 6 para. 1 lit. f GDPR. If necessary, we will inform you of this separately, stating the legitimate interest, insofar as this is required by law.

#### **4. Which of your information and personal data do we process?**

For the aforementioned purposes Radurlaub Zeitreisen GmbH may process the following categories of personal data:

- Contact information, such as first and last name, business address, business telephone number, business mobile phone number, business fax number and business e-mail address;
- Payment data, such as information required for the processing of payment transactions or fraud prevention, for credit card payments this includes credit card information and card verification numbers;
- Information for which processing is necessary for a project or the establishment, execution and fulfilment of a contract with Radurlaub Zeitreisen GmbH;
- Other information which our contact person voluntarily provides us with, such as other project participants, internal and external contacts or special requests
- Previously purchased products or services and their history
- Information collected from publicly available sources, information databases or credit agencies;
- To the extent required by compliance screenings: information on relevant legal proceedings and other legal disputes involving business partners.

#### **5. Who receives your data?**

Within our company your personal data will exclusively be transferred to those departments and persons who need this data to fulfil their contractual and legal obligations or to departments and persons who need to process the data for the implementation of our legitimate interest pursuant to Article 6 para 1 lit. f GDPR.

We also use service providers when processing your personal data, for instance, for the maintenance and servicing of our software programs and IT infrastructure or for cybercrime prevention. As a result your personal data will be transferred to relevant third parties and processed by them on our behalf. This is done only for this purpose on the basis of commissioned data processing pursuant to Article 28 GDPR. We ensure that personal data is processed in accordance with the regulations of the GDPR and that your data is protected and processed in accordance with the applicable data protection regulations. Categories of recipients of personal data include companies that support us in the following areas: IT services, cybercrime prevention, data storage and linking, marketing, market research, payment processing, supply of products and services, online marketing, execution of trade shows and events, shipping logistics, and compliance and regulatory compliance (e.g. comparison with anti-terror lists for exports). We only share the minimum amount of personal information that our service providers need in order to fulfil their services.

In certain cases, we also transfer your personal data to business partners who represent our products as dealers or distributors nationally and internationally. For instance, if we receive an inquiry at a trade fair and receive a request from a visitor for further information that could be attributed to a specific trade partner in terms of content, geography or subject matter, we will forward the personal data to this business partner for processing. Our business partner will then contact you in lieu of us. If we share personal information with other business partners, we require them to protect and process your information in accordance with applicable privacy laws. Data processing and disclosure are based on Article 6 para. 1 lit. f GDPR. The legitimate interest lies in an efficient and customer-oriented sales structure and optimal customer service for our products and services. If you do not wish this disclosure, you can inform us at any time and revoke it. In this case, however, we may not be able to complete your inquiry or order.

Data will only otherwise be transferred to third parties outside the company or affiliated companies if this is permitted or mandated by legal provisions or if the transfer of data is necessary for processing and thus for the fulfilment of the contract. This also includes pre-contractual measures, carried out at your request, and which require the transfer of data to third parties to implement this.

A transfer of data may also take place on the basis of your explicit consent or if we are authorized to disclose information. Recipients of personal data may also be public bodies and institutions with a legal or official obligation (e.g. public prosecutor's office, police, supervisory authorities, tax office).

Your data will not be transferred to other third parties, for purposes such as advertising, without your express consent.

## **6. Transfer of personal data to affiliated companies**

Radurlaub Zeitreisen GmbH may transfer personal data to other Radurlaub Zeitreisen GmbH group companies or companies affiliated with Radurlaub Zeitreisen GmbH (hereinafter referred to as Radurlaub Zeitreisen GmbH Group) for the aforementioned purposes, but only if this is necessary to fulfil the above-mentioned purposes (see also points 2, 3 and 5).

We only share the necessary minimum of personal data with other companies of the Radurlaub Zeitreisen GmbH Group, for example in order to provide you with the products and services you requested, to administer and improve our products, services and everyday operations. Companies which are part of the Radurlaub Zeitreisen GmbH Group may also be outside of the EU and the EEA economic area ("third countries") and thus have lower data protection requirements than those of the EU. Personal data will only be transferred to Radurlaub Zeitreisen GmbH Group recipients in third countries if they have either concluded EU standard contract clauses with us or have introduced binding corporate rules at EU data protection level. Further information can be obtained from the contact indicated under point 1.

The basis for data processing is Article 6 para. 1 lit. b GDPR, which justifies the processing of data to fulfil a contract or pre-contractual measures, and Article 6 para. 1 lit. f GDPR in accordance with the legitimate interests set out above (see also points 2, 3 and 5).

## **7. Data transfer to a third country**

The transfer of personal data to a country or an international organisation outside the European Union (EU) or the European Economic Area (EEA) is subject to legal or contractual permission and only occurs under the conditions set out in Articles 44 ff. GDPR. This means that there is an adequacy decision from the EU Commission pursuant to Article 45 GDPR for the country concerned and there are appropriate safeguards for data protection pursuant to Article 46 GDPR or binding internal data protection provisions pursuant to Article 47 GDPR.

A data transfer to places in states outside the European Economic Area EU/EEA (so-called third countries) takes place if necessary for the execution of a contractual obligation for you or if it is in the context of a legitimate interest of us or a third party or if you have given us your consent. The processing of your data in a third country may also take place in connection with the involvement of service providers within the framework of the processing of an order. Information on the suitable or appropriate guarantees and the possibility of how and where to obtain a copy of these can be requested from the contact specified under point 1.

## **8. How long will the data be saved?**

Where necessary, we process and store your personal data for the duration of our business relationship or for the fulfilment of contractual purposes. This also includes the initiation and execution of a contract. In addition, we are subject to various storage and documentation obligations, including those arising from the German Commercial Law (Handelsgesetzbuch - HGB) and the German Tax Code (Abgabenordnung - AO). These prescribed periods for storage and documentation are two to ten years, but in certain cases also up to thirty years.

We also store and use your data for a reasonable period of time after the order has been placed in order to keep you up to date on and provide you information on our services and offers. This is done on the basis of Article 6 para. 1 lit. f GDPR. Mandatory legal provisions - in particular retention periods - remain unaffected. After this period, we delete personal data in a secure manner. If data is required after this period for analytical, historical or other legitimate business purposes, we will take appropriate measures to make this data anonymous.

## **9. Children and under-aged persons**

Our offer is primarily aimed at adults. Persons under the age of 18 should not provide us with any personal data without the consent of their parents or legal guardians.

## **10. Necessity of providing personal data**

As a rule, you are neither legally nor contractually required to provide personal data for the purpose of establishing, executing and fulfilling a contract or for implementing pre-contractual measures. You are therefore not obliged to provide us with personal data. Please note, however, that this is usually necessary for decisions on the conclusion of a contract, the fulfilment of a contract or for pre-contractual measures. If you do not provide us with any personal data, we may not be able

to make a decision within the framework of contractual measures. We recommend that you only provide personal data that is necessary for the conclusion of the contract, the fulfilment of the contract or pre-contractual measures.

## **11. Automatic decision making**

In principle, we do not use fully automated decision-making for the establishment, performance or execution of the business relationship or for pre-contractual measures in accordance with Article 22 GDPR. Should we use these procedures in individual cases, we will inform you of this separately or, more specifically, request your consent.

## **12. What rights do I have regarding my personal data?**

You can request information about the stored, personal data, which pertains to you, at the addresses listed under point 1. In addition you may request the correction and, under certain circumstances, deletion of your data. You also have the right to restrict the processing of your data and the right to have the data that you provided released back to you in a structured, commonly used and machine-readable format.

### **Right to withdraw consent**

If we process your data to safeguard legitimate interests, you may object to this processing for reasons arising from your particular situation. We will then no longer process your personal data unless we can prove compelling and legitimate reasons for doing so which outweigh your interests, rights and freedoms or in the case that the processing of the data will serve the establishment, exercise or defence of legal claims.

Provided the processing of data is taking place on the basis of your consent, you are entitled under Article 7 GDPR to revoke your consent to the use of your personal data at any time. Please note that this withdrawal of consent will only take effect for future use. Processing that took place before the consent withdrawal is not affected by this. Please also note that we may have to store certain data for a certain period of time in order to comply with legal requirements.

In individual cases we may process your personal data for purposes of direct advertising. You have the right to object at any time to processing of your data for the purpose of such advertising. This also applies to profiling as far as it is connected with this direct advertising. If you object to processing of your data for the purpose of direct advertising, we will not process your personal data further for these purposes.

You may contact our data protection officer or a data protection supervisory authority with a complaint.