

Privacy Statement

Implementation of GDPR Schifffahrtsgesellschaft des Vierwaldstättersees (SGV) AG, Lucerne

01/02/2020, Version 1.2



Privacy Statement

We – the Schifffahrtsgesellschaft des Vierwaldstättersees (SGV) AG – commit ourselves to responsible handling of your personal data. Consequently, we consider it self-evident that the legal requirements of the Swiss Federal Act on Data Protection (DSG), the Ordinance to the Federal Act on Data Protection (VDSG), the Telecommunications Act (FMG) and other provisions of Swiss data protection law are met. With regard to the processing of personal data of affected persons located in the EU, we also comply with the provisions of the EU General Data Protection Regulation (GDPR).

Our promise to customers: We will handle your data confidentially.

The protection of your person and your privacy is an important concern for us. We guarantee that your personal data will be processed in compliance with legal specifications and according to the applicable provisions of data protection law. In summary, we process personal data exclusively according to the following principles:

You decide yourself regarding the processing of your personal data.

Within the legal framework, you can decline data processing at any time, revoke your consent or have your data deleted.

We offer you added value when processing your data.

We use your data exclusively to provide services and to offer you added value (such as customised offers, information and support). We thus use your data only for the development, provision, optimisation and evaluation of our services or to maintain the customer relationship.

Your data will not be sold.

Your data will only be disclosed to selected third parties listed in this privacy statement and only for the purposes explicitly mentioned. If we commission third parties to process data, they are obliged to comply with our data protection standards.

We guarantee security and the protection of your data.

We guarantee careful handling of your data, as well as its security and protection. We ensure the organisational and technical precautions required for this purpose. You will find detailed information below on how we handle your data.

In this privacy statement, we will inform you about the most important aspects of data processing in our company as well as about the data protection claims to which you are entitled. This privacy statement covers the collection of personal data both in the online and in the offline areas.

1 Contact

1.1 Name and address of SGV

The responsible party in terms of data protection law is:

Schifffahrtsgesellschaft des Vierwaldstättersees (SGV) AG Werftestrasse 5



6002 Luzern Switzerland

Phone: +41 (0)41 367 67 67

E-mail: datenschutz@sgvholding.ch

Website: www.lakelucerne.ch

1.2 Name and address of data protection coordinator

The SGV Group is not obliged, according to the EU GDPR, to appoint a Data Protection Officer. However, for organisational reasons, a group-wide data protection coordinator has been appointed:

SGV Holding AG 6002 Luzern Switzerland

Phone: +41 (0)41 367 67 67

E-mail: datenschutz@sgvholding.ch

Website: www.sgvgruppe.ch

2 Legal Bases

The legal basis for the processing of your personal data depends in the individual case on the respective purpose of the data processing. The following are possible:

- Your consent, which you can revoke at any time. An informal message by e-mail to us is sufficient for this purpose. The legality of the data processing already carried out will remain unaffected by the revocation;
- The conclusion or performance of a contract with you or the execution of pre-contractual measures:
- The protection of our justified interests, provided your interests or basic rights and freedoms do not prevail;
- a legal obligation that allows us to process the data.

3 Collection and Processing of Personal Data

3.1 Visits to our Website

When you access our website, data is automatically sent to our website's server through the browser used on your end device. This data is temporarily stored in a log file, known as the server log file. In particular, the access data comprises the IP address, the URL, the operating system used, the name of your Internet access provider, the date and time of access, the type of browser you use to access our website and similar information. This exclusively concerns information that does not allow any conclusions to be drawn about your person.

This data is processed for the purpose of enabling the use of our website (connection setup), permanently ensuring system security and stability, and enabling optimisation our Internet offer, as well as for internal statistical purposes, thus based on our justified interests. This data is not forwarded to third parties or otherwise evaluated. A person-related user profile will not be created.

The data will be deleted as soon as it is no longer required for the purpose of its collection.



Where your personal data is collected to provide the website, this is the case when the respective session is terminated.

3.2 Newsletter

You can subscribe to our Newsletter. Our Newsletter informs you about us and our offers. For this purpose, we require your e-mail address and your statement that you agree to receive the Newsletter.

The basis for processing your personal data after registering for our Newsletter is that you have given your consent. In order to process your personal data, we therefore obtain your consent during the registration process and refer to this privacy statement.

We use what is known as the "double opt-in" procedure for Newsletter registration. This means that after you enter your e-mail address, we send you a confirmation e-mail to the e-mail address you entered in which we ask you to confirm that you requested receipt of the Newsletter. You confirm by clicking on an activation link contained in the confirmation e-mail.

You can unsubscribe from the Newsletter at any time and revoke your consent. You can find the link to the unsubscribe page in each Newsletter. We will continue to store your data until you unsubscribe from the Newsletter.

3.3 Contact Form

For enquiries via the contact form, your details from the enquiry form will be stored for the purpose of processing and handling the enquiry. The data that is collected in a contact form is shown in the contact form. The entries marked with * are obligatory fields. The requesting person can provide all other information on a voluntary basis.

Processing of your personal data is based on our justified interest in processing your request. If the purpose of the contact is the fulfilment of a contract to which you are a party or the implementation of pre-contractual measures, this is an additional basis for processing your personal data. Your data will be deleted as soon as it is no longer required for the purpose of collection.

You can object to this data processing at any time. Please send your objection to the following e-mail address: datenschutz@sgvholding.ch. Your request will not be further processed in this case.

3.4 Online Applications

If you apply for a job with us, we will process the personal data that we have received from you as part of the application process. This includes data on your person, education, work experience and skills, the usual correspondence data such as postal address, e-mail and phone number. In addition, all the documents you submitted in connection with the application, such as motivation letter, CV and references, will be processed. Applicants can also voluntarily provide us with additional information. This data will only be stored, evaluated, processed or forwarded internally in connection with your application. It can also be used for statistical purposes (such as reporting). In this case, no conclusions can be drawn regarding individual persons.

Processing can also be carried out by other electronic means. In particular, this might be the case if you sent us the respective application documents by electronic means, such as e-mail.



Processing of your personal data is based on our justified interest in processing your application.

You can object to this data processing at any time and withdraw your application. Please send your objection to the contact person given in the job advertisement or to the e-mail address: datenschutz@sgvholding.ch.

If we conclude an employment contract with you, the transferred data will be stored for the purpose of processing the working relationship, in compliance with statutory provisions.

If the application process ends without you being hired, your data will deleted unless you have given us your consent to use your data for other application processes with us. You can of course revoke this consent at any time. You can send your revocation to the e-mail address datenschutz@sgvholding.ch or to the e-mail address given in the job advertisement.

3.5 Online Shop

To place orders in the online shop, you will have to open a customer account. Which personal data is transmitted to us is taken from the respective input screen which is used to open your customer account.

When you open a customer account, you will receive password-protected direct access to the data you have stored with us. You can use your customer account to log in to our online shop. In your customer account, you can view data on your completed and open orders, as well as manage and change your personal data.

Processing of your personal data in the online shop is based on your and our joint justified interest in processing your order. If the order is used to fulfil a contract to which you a contracting party or to execute pre-contractual measures, this constitutes an additional basis for processing your personal data.

The purpose of processing your personal data is to provide you with the services you have requested and to process the related payment.

The service providers we use (such as payment service providers (Mastercard, Visa, PayPal)) will receive the required data for order processing, as part of the order handling process. The payment service provider you have selected bears the responsibility for your payment data. You can find more detailed information on data protection at these providers on their websites.

If you wish to close your customer account, the appertaining data will be deleted, subject to legal retention obligations. It is your responsibility to save your personal data in the case of termination before the end of the contract.

3.6 Competitions

If you take part in competitions, we will collect your personal data required for participating in the competition. This is usually name and contact data. It is possible that we might pass on your personal data to our competition partner, for example, in order to send you your winnings. Participation in the competition and the associated data collection is of course voluntary. You can find detailed information on the respective competition in our conditions of participation.



The basis for processing your personal data is the fulfilment of a contract to which you are a contracting party.

3.7 Market Research

We do not use the data we collect as part of market research and opinion polling for advertising purposes. You will find detailed information (in particular regarding the evaluation of your data) in the respective survey or where you enter your data. Your answers in surveys will not be forwarded to third parties or published.

In order for your personal data to be processed, you must give your consent.

You can revoke your consent at any time. Please send your revocation to the following e-mail address: datenschutz@sgvholding.ch.

3.8 Internal Area on Website for Employees

We offer employees an internal area on our website. A password is issued to access the internal area. The password is not person-related. Employees can find useful information on SGV in the internal area.

3.9 Downloads

We do not require you to provide any personal data for downloads.

3.10 Provision of Contractual Services

We also process personal data to the extent necessary to meet our contractual and pre-contractual obligations as well to carry out other services requested by you, as described in this privacy statement. The personal data processed here, the type, the scope and the purpose of the processing required in each case, are therefore determined by the contract agreed with you or the services requested by you.

If we store your personal data based on a contractual relationship, this data will remain stored at least as long as the contractual relationship lasts and at the latest as long as the limitation periods for potential claims by us run or statutory or contractual obligations to keep records exist.

4 Cookies

We use cookies based on the justified interests on our website. Cookies are small text files that are filed and saved on your end device using the browser. Cookies do not damage your end device. They cannot execute any programs or transmit any viruses to your computer. Cookies are used to make our website more user-friendly and effective and to make your visit to our website as pleasant as possible.

Most of the cookies we use are called session cookies. They are automatically deleted when you log out or close the browser. Other cookies remain stored on your computer beyond the respective use process and enable us or our partner companies (cookies from third-party providers) to recognise your browser at the next visit. Insofar as other cookies (such as cookies for analysing your surfing behaviour) are stored, they will be dealt with separately in this privacy statement.

Most Internet browsers are regularly set up such that they accept cookies. If you do not desire this, you can set your browser such that it informs you about the setting of cookies and you can



allow cookies to be accepted in only in individual cases in certain cases or exclude them altogether. You can also activate automatic deletion of cookies when you close the browser. In addition, you can delete cookies that have already been set at any time via an Internet browser or other software programs.

The procedure for checking and deleting cookies is dependent on the browser you use. You can find more information on this in the Help menu of your browser. Please note that individual functions on our website might not work if you deactivate the use of cookies.

5 Google Services

Based on our justified interests in the analysis, optimisation and economic operation of our Internet presence, we rely on various services of the American company Google LLC ("Google"), 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA:

- Google Analytics
- Google AdWords
- Google Tag Manager

Google uses cookies. The cookies used by Google enable us to analyse your use of our website. The information generated by the cookie about your use of our website (including your IP address) is transmitted to a Google server in the USA where it is stored.

Google is certified under the EU-US and Swiss-US Privacy Shield Agreement, under which it guarantees to adhere to the European and Swiss data protection laws. You can find more information in this context at: https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active.

5.1 Google Analytics

We use the web analysis service of Google Analytics for the purpose of demand-oriented design and continuous optimisation.

In this context, pseudonymised user profiles are created and cookies used to evaluate the usage of our website, to compile reports on website activities and to provide services associated with website and Internet usage. This information might also be forwarded to third parties if this is stipulated by law or if third parties process this data on our behalf. However, your IP address will under no circumstances be consolidated with other Google data.

We only use Google Analytics with activated IP anonymisation. This means that your IP address will be abbreviated by Google within the EU/EEA or Switzerland. Only in exceptional cases will the complete IP address be transmitted to a Google server in the USA and abbreviated there.

You can prevent cookies being stored by a corresponding setting in your browser software. However, we must advise you that you might not be able to use all the functions of this website in this case. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) as well as the processing of this data by Google by downloading and installing the browser plugin available at the following link: https://tools.google.com/dlpage/gaoptout?hl=de.



You can find further information in connection with Google Analytics in the Google Analytics Help https://support.google.com/analytics/answer/6004245?hl=de.

You can find more detailed information on terms of use and data protection at www.google.com/analytics/terms/de.html or at www.google.de/intl/de/policies/.

5.2 Google AdWords

We use Google AdWords and in this connection conversion tracking.

Here, a cookie is filed on your end device by Google AdWords (called a "conversion cookie"), if you have reached our website via a Google ad. These cookies lose their validity after 30 days, but do not contain any personal data and are thus not used for personal identification. If you visit certain Internet pages of our website and the cookie has not yet expired, we and Google can recognise that you have clicked on the ad and have been forwarded to this page. Each Google AdWords customer will receive a different cookie. It is thus not possible for cookies to be tracked via the websites of AdWords customers. The information collected by the conversion cookies is used to create conversion statistics for AdWords customers who have decided on conversion tracking. We do not receive any information with which you can personally identify yourself.

The information collected by the cookie regarding your use of our website is usually transmitted to a Google server in the USA, where it is stored. Based on the information collected, your browser is assigned categories relevant to your interests. These categories are used for placing interest-based advertising.

By using Google AdWords, we reach users who have already visited our website. We can thus present our advertisements to target groups who have already shown interest in our products or services.

You can object to interest-based advertising by Google AdWords by making the appropriate settings at

http://www.google.com/settings/ads.

You can find further information on data processing and notes on data protection in the context of Google AdWords at https://www.google.de/policies/technologies/ads/.

5.3 Google Tag Manager

We also use the Google Tag Manager to integrate and manage the Google analysis and marketing services in our website. Google Tag Manager is a solution which we can use to manage website tags via an interface. The tool "Google Tag Manager" itself, which implements the tags, is a cookie-free domain and does not collect any personal data. However, the tool ensures that other tags are triggered that might record data. Google Tag Manager itself does not access this data. If a deactivation has been made at domain or cookie level, this will remain valid for all tracking tags that are implemented with Google Tag Manager.

You can find further information in connection with Google Tag Manager in the terms of use for Google Tag Manager https://www.google.com/intl/de/tagmanager/use-policy.html.



6 Zendesk Chat

On our website, you have the option of using the Zendesk Chat to contact us. This software is operated via an external system from Zendesk, Inc., 989 Market Street #300, San Francisco, CA 94102, USA. This is an optional feature and instead, you can contact us directly, for example, by e-mail or phone. If you use the chat, your IP address and the visited site (our site) will be recorded. The IP address will be anonymised. Zendesk Chat also uses cookies. The information generated by the cookie on the use of our website (including the anonymised IP address) will be transmitted to the Zendesk server in the USA, where it is stored. Chats will be logged and stored. You can prevent cookies being stored by a corresponding setting in your browser software. However, we must advise you that you might not be able to use all the functions of this website in this case.

Zendesk is certified under the EN-US and Swiss-US Privacy Shield Agreement and thus offers a guarantee of compliance with European and Swiss data protection laws. You can find further information in this connection at: https://www.privacyshield.gov/participant?id=a2zt0000000TO-jeAAG&status=Active.

You can find further information on data processing by Zendesk in Zendesk's privacy statement at: https://www.zendesk.com/company/customers-partners/privacy-policy/.

7 Pixels, Local Storage and Similar Technologies

On the basis of our justified interest, we also use further technologies such as tracking pixels and local storage. We use these technologies to check which functions are most popular, in order to create a more personalised user experience and to place user-relevant advertising.

Tracking pixels (which are also called clear GIFs, web beacons and pixel tags) are small code units that are installed in or on a website, mobile app or advertisement. These tracking pixels can retrieve certain information on your browser and your device, such as operating system, browser type, device type and version, linking website, visited website, IP address and other similar information.

Our Newsletter might contain a web beacon. A web beacon is a 1x1 pixel, non-visible graphic, which is linked with the user ID of the respective Newsletter subscriber.

For each Newsletter sent, information exists on the address file used, the subject and the number of Newsletters sent. In addition, the addresses that have not yet received the newsletter, as well as the addresses to which it has been sent and the addresses for which sending was unsuccessful, are also visible. Data also exists on the opening rate, including the information on which addresses have opened the Newsletter. And finally, the information regarding which addresses have unsubscribed is available. We use this data for statistical purposes and to optimise the Newsletter with regard to content and structure. This enables us to better tailor the information and offers in our Newsletter to the individual interests of the recipients. The tracking pixels will be deleted if you delete the Newsletter.

In order to prevent the tracking pixel being used in our Newsletter, please make the appropriate settings in your mail program to ensure that HTML is not displayed in messages, if this is not already the case in the standard settings. On the following pages, you will find explanations on how



you can make this setting in the most common e-mail programs.

8 Social Plugins

We use social plugins ("plugins") from the following social networks on our website, based on our justified interests:

- Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA
- Instagram Inc., 1601 Willow Road, Menlo Park, California 94025, USA
- TripAdvisor Inc., 400 1st Ave, Needham, MA 02494, USA

If you visit our website and one of the plugins listed on the website is activated, a direct connection between your browser and the server of the social network concerned will be established. The content of the plugin is transmitted directly from the social network to the browser, which integrates it into the website. The social network thus receives the information that you have visited our website. If you are logged into the social network, it can assign this visit to your account. If you interact with the plugins, the respective information (including your IP address) will be transmitted directly from the browser to the social network, where it is stored.

Even if you are not logged into the social network during your visit to our website, data from websites with active social plugins can be sent to the networks. Each time the website is visited, an active plugin sets a cookie with an identifier. As your browser sends this cookie every time you connect to a network server without being asked, social networks could in principle use it to create a profile of which websites the user belonging to the identifier has called up. It might then be possible to assign this identifier to a person again subsequently - for example, when they log onto the social network at a later point in time.

You can select the function "Block cookies from third-party providers" in your browser settings, then your browser will not send any cookies to the respective server of the social network. However, with this setting, other cross-site functions from other providers, apart from the plugins, might no longer work.

For further information on the purpose and scope of data collection and processing by social networks, as well as your rights and setting options for protecting your privacy and your right to object to the creation of user profiles, please refer to the data protection notices of the respective networks:

- https://www.facebook.com/policy
- https://instagram.com/about/legal/privacy/
- https://tripadvisor.mediaroom.com/us-privacy-policy

9 Joint Responsibility in Public Transport

As a public transport company, the SGV is obliged by law to provide certain transport services with other transport companies and associations ("Direct Transport").

For this and other purposes described in this privacy statement, data is passed on at national level within the association National Direct Transport (NDV), an alliance of over 240 transport



companies (TU) and associations of public transport. The individual transport companies and associations are listed here (link to: https://www.allianceswisspass.ch/de/Themen/Datenschutz/Ueber-sicht-Transportunternehmen-und-Verbuende). Data relating to the purchase of services and the establishment of contacts is stored in a central database which is managed by the SBB (Swiss Federal Railways) on behalf of the NDV and for which we are jointly responsible with the other companies and affiliates of the NDV ("DV database").

For services that you purchase using the SwissPass login, the data is then stored in another central database ("SwissPass Database), for which we are jointly responsible with the transport companies and NDV associations, whereby the database is in turn maintained by the SBB on behalf of the NDV. For the purposes of efficient service provision and cooperation between the parties involved, the data from the various databases is merged where necessary. In order to enable Single Sign-On (SSO) (a login for all applications which offer use of their services with the SwissPass login), the aforementioned login, card, customer and service data will also be exchanged between the central login infrastructure of the SwissPass and us as part of the authentication process.

The scope of access to the joint databases by the individual transport companies and associations is regulated and restricted by a joint agreement. The forwarding and processing by the other transport companies and associations of the NDV that has taken place with central storage is always restricted to the contract execution, the ticket inspection, the after sales service (service Après Vente) and the distribution of income. In addition, the data which is collected when purchasing services from the NDV (link to: https://www.allianceswis-

spass.ch/de/Themen/Datenschutz/Uebersicht-Sortiment) will be processed for marketing purposes in particular cases. This includes the evaluation of data, in order to further develop and advertise the services of public transport according to needs. If, for this purpose, processing or contact with you takes place, this will only ever be carried out by the transport company or association from whom you purchased the respective service of the NDV. Processing and contact by the other transport companies and associations involved in the NDV only takes place in exceptional cases and under strict regulations, and only if the data evaluation shows that a particular offer by public transport could provide added value for you as a customer. An exception to this is processing and contact by the SBB. The SBB performs marketing on behalf of the NDV for the NDV services (such as GA and half-fare) and as such can contact you on a regular basis.

Our justified interest forms the legal basis for the data processing mentioned here.

We will not resell your data. Your personal data will then only be passed on to selected service providers and only to the extent necessary to provide the service. These are IT support service providers, subscription card issuers, shipping service providers (such as the Swiss Post), service providers who are responsible for distributing transport revenue among the participating transport companies (in particular in the course of creating distribution keys in terms of the Swiss Passenger Transport Act), our hosting provider as well as the providers mentioned in the sections on tracking tools, social plugins and advertisements.

In addition, your data might be forwarded if we are obliged to do so by law or if this is necessary in order to safeguard our rights, in particular to enforce claims arising from the relationship with you.



If you book international journeys, your data will also be forwarded to the respective foreign provider. However, this is only performed to the extent necessary to check the validity of tickets and to prevent misuse.

Our justified interest forms the legal basis of the data processing mentioned here.

Your personal data from the public transport range of services will not be disclosed to other third parties apart from public transport. The only exceptions are SwissPass partners and companies that have been granted approval for the procurement of services of public transport by the public transport companies, based on a contractual agreement. These agents will only receive access to your personal data if you want to purchase a public transport service and have granted your consent for access to them. Even in this case, they will only receive access to your data to the extent that is necessary to establish whether you already have tickets or season tickets for the planned travel period which are relevant for your journey or for the service you require from the third party. The legal basis for this data processing is therefore your consent. You can revoke your consent at any time with effect for the future.

If you utilise offers from a SwissPass partner (link to: https://www.allianceswis-spass.ch/de/Themen/Datenschutz/Uebersicht-SwissPass-Partner) using your SwissPass, data on the services you might have purchased from us (such as a GA, half-fare or network season ticket) can be transmitted to the SwissPass partners to check whether you can benefit from a specific offer from the SwissPass partner (such as discount for GA holders). In the event of loss, theft, abuse or forgery or a card replacement after a service has been purchased, the partner concerned will be informed. This data processing is necessary for the performance of the contract for using the SwissPass and is therefore based on this legal framework. You can find more information in the Privacy statement at swisspass.ch [link to: https://www.allianceswis-spass.ch/de/Themen/Datenschutz) as well as the privacy statement of the respective SwissPass partner.

10 Transfer to Third Parties

We will only pass on your data if you have explicitly consented to this, if we are obliged to do so by law or if it is necessary within the framework of the use of the website as well as for answering questions, processing enquiries or for the possible provision of services you have requested (including those outside of the website).

The use of the data disclosed to third parties is strictly restricted to the purposes mentioned above. These third-party companies are obliged to maintain your privacy to the same extent as we are. If the data protection level in a country is not considered equivalent for Swiss standards or in terms of the GDPR, we will ensure by means of a contract that your personal data is protected at all times according to Swiss guidelines and the EU General Data Protection Regulation.

We disclose your personal data to the following categories of recipients:

- Companies of the group
- Service providers of the website and e-mails
- Service providers for reservations
- Hosting partners
- Authorities



If we use order processors to provide our services, we will take appropriate legal precautions as well as corresponding technical and organisational measures to ensure protection of personal data according to the relevant statutory provisions.

11 Storage Duration/Storage Location

We process and store your personal data only for the period of time that is required to achieve the purpose of storage or as provided for by laws or regulations to which we are subject. If the purpose of storage ceases to apply or if a prescribed storage period expires, the personal data is routinely blocked or deleted in compliance with statutory provisions.

We will also delete your data if you request us to at datenschutz@sgvholding.ch and we do not have any legal or other obligation to store or secure this data.

Your data is always stored in databases within Switzerland. However, in some of the cases listed in this privacy statement, the data is forwarded to third parties who are based outside of Switzerland. If the country concerned does not have an adequate data protection level, we will guarantee either by contractual arrangement with these companies or by ensuring certification of these companies under the CH/EU-US Privacy Shield that your data will be appropriately protected at these companies.

12 Data Security

We will take technical and organisational safety precautions to protect your personal data against manipulation, loss, destruction or against access by unauthorised persons and to ensure the protection of your rights and compliance with the applicable data protection regulations.

The measures taken are intended to guarantee the confidentiality and integrity of your data, as well as to ensure the availability and resilience of our systems and services when processing your data in the long term. They should also ensure the rapid restoration of the availability of and access to data in the event of a physical or technical incident.

Our data processing and our security measures will be continuously improved in accordance with the technological development.

We also take our own, internal company data protection very seriously. Our employees and the service companies we engage are obliged to maintain secrecy and to comply with data protection regulations. Furthermore, they are only granted access to personal data to the extent necessary.

13 Use of the Website by Minors

The website is aimed at an adult audience. Minors, in particular children under 16 years, are forbidden, without the consent or approval of parents or legal guardians, to transmit personal data about themselves to us or to register for a service. If we establish that such data has been transmitted to us, it will be deleted. The parents (or legal representatives) of the child can contact us and request deletion or deregistration. For this purpose, we require a copy of an official document which identifies you as a parent or legal guardian.



14 Linked Websites

Our website can contain links to websites of other providers to which this privacy statement does not extend. After the link has been clicked, we have no more influence on the processing of any data transmitted to third parties (such as the IP address or the URL) as the behaviour of third parties is naturally beyond our control. We can therefore not accept any responsibility for the processing of your personal data by third parties. Insofar as the collection, processing or use of your personal data is associated with the use of websites from other providers, please observe the data privacy notices of the respective provider.

Illegal contents were not recognisable at the time of linking. However, a permanent control and check of linked sites without specific indications of a legal violation is not reasonable. If legal violations become known, such links will be removed immediately.

15 Your Rights

Right to Information

You have the right to request information from us regarding whether and if which of your personal data we are processing.

Right to Correction

You have the right to request the correction of any of your personal data that might be incorrect and if necessary to complete incomplete personal data in our systems.

Right to Deletion

You have the right to request that your personal data is deleted, for example, if the data is no longer required for the purposes pursued. However, if we are nevertheless obliged or authorised to retain your personal data due to legal or contractual obligations, we can in such cases therefore only restrict or block your personal data to the extent necessary.

Right to Limitation of Processing

You have the right to request the limitation of processing of your personal data.

Right to Data Transferability

You have the right, where appropriate, to receive your personal data which we are processing automatically based on your consent or in performance of a contract, in a structured, common and machine-readable format and to request transmission of this data to a third party. If you request direct transmission of personal data to another responsible person, this is only possible to the extent that it is technically feasible.

Right of Objection

You have the right to object to the processing of your personal data at any time in accordance with legal requirements. In particular, you have the right to object to the processing of your personal data for the purposes of direct advertising.

Revocation of Consent

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



basically with consequences for the future.

Right of Appeal

If applicable, you have the right to appear to a responsible supervisory authority if you are of the opinion that your personal data violates data protection regulations.

If you have any questions in connection with the data protection practised by us and for information regarding your rights and their assertion, you can contact us using the contact details given in Section 1 of this privacy statement. If necessary, we reserve the right to ask for your identification in an appropriate manner for the processing of enquiries.

16 Changes to the Privacy Statement

This privacy statement can be supplemented or changed by the company at any time. All changes and supplements are at the sole discretion of the company.

Status: January 2020.