

Privacy Policy

Welcome to the LABRANDA Hotels & Resorts website

We thank you for your interest in our services. Protecting your privacy and data is very important to us. We only collect and use your data in accordance with applicable provisions regarding data protection. In the following, we as the controller will explain to you what data we collect and how we process these data.

1. Personal data

Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Personal data will only be saved if it is necessary for providing the booked services, adhering to legal guidelines or for purposes explained in the following.

2. Anonymised data / log files / IP address

You can visit our website without providing any personal data. However, certain anonymous data will be saved each time our website is visited, e.g. which page or which offer was called up. This data is not personal, however, and thus is not subject to the legal guidelines regarding data protection.

The website operator or site provider collects data about visits to the site and store these as server log files. The following data are logged in this manner:

Website visited, time of access, quantity of data sent in bytes, source/link from which you reached the site, browser used, operating system used, IP address used.

The data collected is used for statistical analysis and to improve the website. The website operator reserves the right to examine the server log files at a later time should there be specific indications of unlawful use.

Anonymous data is only collected for statistical evaluation in order to improve our services. For further information, please take note of the figure "Right to information / revocation rights".

3. Purpose of collecting personal data

Personal data must however be provided if you make a travel booking or other booking via our website, contact us, subscribe to our newsletter or use other services on our website that require personal data to be given. These include the management of your data in a personal customer account with a login function, voucher purchases, participating in competitions or amending existing bookings or orders.

In accordance with legal provisions, we will normally only collect data necessary for the service you require. If our forms ask you to provide further information, this is always voluntary and will be marked as such.

The temporary storage of the IP address by the system is necessary in order to enable the delivery of the website to the user's computer. To do this, the IP address of the user must be stored for the duration of the session. This is also stored in log files in order to ensure the functionality of the website. The data is also used to optimise the website and to ensure the security of our information technology systems. In this connection, the data will not be analysed for marketing purposes. Our legitimate interests in data processing.

If a travel booking is made or another service is booked, the data collected will be used to process this booking and used for advertising and statistical purposes, within the scope of legal provisions.

If you subscribe to our newsletter, we also store and use the data you provided about yourself and your orders and travel services when booking or registering in order to give you optimum service as a newsletter subscriber.

We also use the personal data that we have collected to improve customer relations and to provide better customer care (e.g. information about the trip), to carry out our own advertising and marketing initiatives (e.g. sending out catalogues or other advertising within the scope permitted by law, feedback on customer satisfaction) and to process your order.

4. Legal basis for the processing of personal data

For the processing of personal data required for the performance of a contract to which the data subject is a party, the legal basis is our legal obligation to fulfil the contract. This also applies to processing that is required to perform pre-contractual measures.

If the processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, the legal basis shall be protection of legitimate interests.

5. Transfer of personal data to third parties

We will only transfer your personal data in accordance with the applicable competition and data protection regulations.

Your data will also be transferred to our subcontractors or other service providers related to your booking (e.g. processing newsletters to be sent by post or email, payment processing, customer service) if this is necessary for us to fulfil our legal obligations and to provide you with the services we owe you.

Data will also be transferred to persons or companies in order to process your order or booking, particularly for travel services to airlines, tour operators, hotels, travel agencies, incoming agencies, car rental companies, cruise operators, authorities etc. Ensure that the privacy provisions at the domicile of these persons and companies may differ from those at our location

Your data will also be disclosed and sent to third parties if we are obliged to do this by law or on the basis of a final court ruling.

You have the right to receive the personal data concerning you which you have provided in a structured, commonly used and machine-readable format. You also have the right to transmit

this data to another controller without being hindered by the controller to whom the personal data was provided.

6. Storage and erasure of data

Your personal data will be stored in accordance with the purposes listed under "Purpose of collecting personal data". The personal data of the data subject will be erased or blocked once the purpose ceases to apply. Data may also be stored if this has been provided for by the European or national legislator in Union ordinances, laws or other regulations to which the controller is subject. The government has set down various storage periods for data. The data will also be blocked or erased if the retention period prescribed by the standards mentioned, unless it is necessary to continue storing the data for the conclusion or performance of a contract.

7. Use of cookies

We use cookies (small computer files with text information sent by the web server to your Internet browser) in order to improve your experience when visiting our website. For example, some notices will only appear once if you allow us to use cookies. Cookies also have an expiry date. If you delete your cookies manually before their expiry, you will receive a new one upon your next visit to the site if you do not block the storage of cookies.

The technical specifications only allow cookies to be read by the server that sent them. We assure you that no personal data will be stored in cookies.

Unfortunately, you will only have limited use of our services if you do not agree to the use of cookies. We therefore recommend you permanently activate the cookies when using our website. Most internet browsers automatically accept cookies. You can, however, deactivate cookies and set up your internet browser to inform you as soon as cookies are sent.

8. Use of Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses cookies, which are text files placed on your computer, to help the website analyse how you use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. 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. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

The Google tracking codes of this website use the `_anonymizeIp()` function, which means that IP addresses are only processed in a shortened form in order to prevent direct personal identification. You may object to the collection and storage of data at any time for the future. Clicking on the "deactivate" button will completely stop tracking. In order to make a permanent objection, the browser used must accept cookies. Alternatively, the data

collection can be refused by using a Google browser plug-in which prevents the information collected by cookies (including your IP address) from being sent to Google Inc. and used by Google Inc. You can find the relevant plug-in on the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>.

9. Trusted Shops ratings

If you have given us your express consent during or after your order, by activating the relevant check box or clicking on the button provided for (“Rate later”), we will transmit your email address to Trusted Shops GmbH, Subbelrather Str. 15c, 50823 Cologne, Germany (www.trustedshops.de) so that they may send you a reminder email to rate your order. This consent may be revoked at any time by sending a message to the contact option described below or directly to Trusted Shops.

10. Facebook Social Plugins

This website uses Social Plugins (“Plugins”) of the social website facebook.com, which are operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (“Facebook”). The plugins can be identified by the Facebook logo (white “f” on a blue tile or a “Like” button), or by the words “Facebook Social Plugin”. The list and appearance of the Facebook social plugins can be viewed here: <http://developers.facebook.com/plugins>.

If a website of this online presence that contains such a plugin is called up, the browser used will establish a direct connection with the Facebook servers. The content of the plugins is transmitted directly by Facebook to the browser used which then integrates this in the website. We have no control over the data that Facebook collects via this plugin and would therefore like to clarify how we believe the system works: by embedding the plugin, Facebook receives the information that the corresponding pages of our Internet presence has been accessed. If you are logged into Facebook, Facebook can associate your visit with your Facebook account. If you interact with the plugins (such as when pressing the “Like” button or making a comment), the relevant information is transmitted directly from your browser to Facebook and stored there. If you are not a member of Facebook, there is still the possibility that your IP address will be revealed to Facebook and stored there. To see the purpose and scope of the data collection and the further processing and use of data by Facebook and the associated rights and settings available for the protection of your privacy, please see Facebook’s privacy policy: <http://www.facebook.com/policy.php>. If you are a Facebook member and do not wish Facebook to collect data about you via our website and link to your member data in Facebook, you must log out from Facebook prior to visiting this online presence. It is also possible to block Facebook Social Plugins with add-ons for the browser used, such as the Facebook Blocker.

11. Facebook Conversion Pixel

This online presence uses Facebook Pixel of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA (“Facebook”). This tracks the behaviour of users once they have viewed or clicked on a Facebook advertisement. This procedure serves to analyse the effectiveness of Facebook advertisements for statistical and market research purposes, and can help optimise future advertisement measures.

The data collected is anonymous to us, and cannot be used to identify the user. However, the data is stored and processed by Facebook in order to enable a connection with the

relevant user profile and so that Facebook can use the data for its own advertisement purposes, in accordance with the Facebook privacy policy (<https://www.facebook.com/about/privacy/>). The user can switch off Facebook advertisements and those of its partners, including outside Facebook. A cookie may also be stored on your computer for this purpose. By visiting our website and our Facebook page, you consent to its use. In order to refuse the use of cookies on the computer in general, the Internet browser can be set so that no cookies can be stored on the computer in the future or any cookies already stored are deleted. Disabling all cookies may mean that some functions on our Internet pages will no longer work. The user can also deactivate the use of cookies by third part providers such as Facebook on the following website of the Digital Advertising Alliance: <http://www.aboutads.info/choices/>

12. Use of the Google +1 button

This online presence uses the “+” interface of the Google Plus social network, which is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The button can be identified by the “+1” button on a white or coloured background. If a website of this online presence that contains such an interface is called up, the browser used will establish a direct connection with the Google servers. The content of the “+1” interface is transmitted directly by Google to the browser used which then integrates this in the website. The provider therefore has no control over the data collected by Google via the interface, but assumes that the IP address is also recorded. To see the purpose and scope of the data collection and the further processing and use of data by Google and the associated rights and settings available for the protection of your privacy, please see Google's privacy policy on the “+1” interface. <http://www.google.com/intl/de/+/policy/+1button.html>.

If you are a Google Plus member and do not wish Google to collect data about you via our website and link to your member data in Google, you must log out from Google prior to visiting this online presence.

13. Use of Twitter's tweet button

This online presence uses the “Tweet” interface of the social network Twitter, which is operated by Twitter Inc., 750 Folsom Street, Suite 600, San Francisco, CA 94107, United States (“Twitter”). The button can be identified by the dark blue bird and the word “Tweet” on the light blue background. If a website of this online presence that contains such an interface is called up, the browser used will establish a direct connection with the Twitter servers. The content of the “Tweet” interface is transmitted directly by Twitter to the browser used which then integrates the Twitter message. The provider therefore has no control over the data collected by Twitter via the interface, but assumes that the IP address is also recorded. To see the purpose and scope of the data collection and the further processing and use of data by Twitter and the associated rights and settings available for the protection of your privacy, please see Twitter's privacy policy: <http://twitter.com/privacy>.

If you are a Twitter member and do not wish Twitter to collect data about you via our website and link to your member data in Twitter, you must log out from Twitter prior to visiting this online presence.

14. Use of the Pinterest button

This online presence uses the “Pin it” interface of the social network Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA (“Pinterest”). The Pinterest plugin can be identified on our site by the “Pin it button” in white lettering on a red background or in red lettering on a white background, alternatively by a red and white “P” on a white background.

If you click on the Pinterest “Pin it button” when you are logged into your Pinterest account, you can link the content of our pages to your Pinterest profile. This allows Pinterest to associate the visit to our pages with your user account. Please note that as the provider of the pages, we do not have any knowledge of the content of the data transmitted and the use thereof by Pinterest. You can find further information on this in Pinterest’s policy privacy at: <http://pinterest.com/about/privacy>

15. Use of the Instagram button

This online presence uses social media plugins of the social network Instagram, which are operated by Instagram Inc., 1601 Willow Road, Menlo Park, California, 94025, USA. The Instagram plugin can be identified by the “Instagram button” on our homepage.

If you press the Instagram while you are logged into your Instagram account, you can link content of our Internet presence to your Instagram profile. This allows Instagram to associate the visit to our pages with your user account.

Please note that as the provider of the pages, we do not have any knowledge of the content of the data transmitted and the use thereof by Instagram. You can find further information on this in Instagram’s policy privacy at: <http://instagram.com/about/legal/privacy>

16. Use of Ve Interactive

This online presence uses retargeting technology from Ve Interactive Limited, 15-19 Bakers Row, London, EC1R 3DG. This uses Ve Interactive Java snippets, which are implemented on your computer when the website is used and which permit analysis of your use of the website and intermediate storage of form inputs on the internet page. The information so generated about your usage of this website is generally transferred to a Ve Interactive server in London and stored there for a maximum of 30 days. On our behalf, Ve Interactive uses this information in order to transmit the temporarily stored data to you by e-mail if the connection to your computer becomes unstable or breaks up. The data transmitted from your browser by VeApps is not coordinated with other data on the internet site. Having regard to the applicable statutory data protection provisions, fully anonymous data is also stored on your computer in cookies and deleted after 30 days. This data is only used for statistical

evaluation. More information about how Ve Interactive Ltd processes your data and how to deactivate tracking can be found on <https://www.ve.com/de/cookies-richtlinie>.

17. Use of advertising networks

This online presence makes use of a partnership with the advertising networks mentioned below for capture of your non personally identifiable data by cookies from third party providers. This enables the advertising networks to offer targeted and relevant advertising from selected third-party websites, all on the basis of your viewing behaviour on our online presence and other selected websites.

We share your non personally identifiable data with the advertising networks and handle it with strict confidentiality, our sole purpose being to provide you with ever more relevant advertising. Rules have been established to guarantee the input of suitable advertising, and you have an option for deselecting all targeted advertisements of this kind from the advertising networks. However, we have no control over the use of cookies by the advertising networks. You have two options for deselecting the use of cookies.

Generally, providing this is supported by the advertising network in question, via the Network Advertising Initiative (NAI) or the Digital Advertising Alliance's (DAA) Self-Regulatory Program for Online Behavioral Advertising. Each of these programs provides a deselection page which, from a centralised location, offers you control over the cookies of their members of participants.

- NAI: http://www.networkadvertising.org/managing/opt_out.asp
- DAA: <http://www.aboutads.info/choices/>

In addition you have the following individual options with each advertising network:

Adara : <http://adara.com/privacy-promise/opt-out>
Adscale: <https://ih.adscale.de/adscale-ih/oo>
AdUp: <https://www.adup-tech.com/datenschutz/>
Infoonline: <https://optout.ioam.de/>
IntentMedia: <https://intentmedia.com/opt-out/>
Kayak: <https://www.kayak.de/privacy#cookies>
Reachgroup: <https://www.reachgroup.com/opt-out/>
Sociomantic: <https://www.sociomantic.com/privacy/de/>
Sojern <http://preferences-mgr.truste.com/?affiliateId=111>

18. Software solutions for optimising the online presence

This online presence employs various software solutions for optimising its online offering. By means of these, the use of the website can be evaluated and helpful information about the user's requirements collected in order on this basis to constantly improve the user-friendliness and quality of the online presence. In order to perform these analyses, aggregated and anonymous statistical data is acquired. This data consists of connection and movement data without personal reference, which are connected with the browser used, the number of page views and visits, click behaviour and duration of the individual visitor's stay on the online presence. During the acquisition and processing, the abbreviated IP address of the user may be used and stored.

The data is especially evaluated for the following purposes:

- Counting the visitors
- Measuring the special areas of demand on the online presence for each visitor
- Evaluation of the origin of the visitor for optimisation of the online presence
- Target-group specific control of recommendations.

In these procedures, so-called permanent cookies are used (see also Section 7 above). Here too, you may at any time reject the storage of these cookies by suitable browser settings, or only allow their storage with your express consent. In addition, you have at any time the option of preventing use of data generally in all solutions employed, by selected the so-called "Opt-out" options offered by the software solution used. However, if you opt out, you will, for example no longer be provided with tailored recommendations.

Our online presence uses the following software solutions as described above (clicking on each provider will take you to its Opt-out option): ,

AT Internet:	http://www.xiti.com/de/optout.aspx
Maxymiser:	http://www.maxymiser.de/cookie_optout.htm
Criteo:	http://www.criteo.com/de/datenschutzrichtlinie
Google:	http://www.google.com/settings/ads
Next Performance:	http://www.nextperf.com/de/privacy
Facebook:	http://www.youronlinechoices.com/de/praferenzmanagement/
Atlas Solutions, LLC:	http://www.youronlinechoices.com/de/praferenzmanagement/
AdTriba:	https://www.adtriba.com/privacy-policy.html
TagCommander:	http://www.tagcommander.com/de/datenschutz/
The Adex:	http://www.youronlinechoices.com/de/praferenzmanagement/
Tapad:	http://www.youronlinechoices.com/de/praferenzmanagement/

Note: Opting out is performed by means of a cookie. If this cookie is deleted, a further opt-out will be necessary.

19. Use of fullstory

This online presence uses Fullstory, a website analysis service from Fullstory Inc., 818 Marietta Street, Atlanta, GA 30318, USA. Fullstory records the user behaviour on our website. The records of user sessions allow the site provider to analyse these and thus improve the website experience for the user. Fullstory stores and collects data in anonymised form by means of cookies. Tracking (i.e. the capture of the data generated by the cookie relating to the use of the website) may be deactivated at any time. Please follow the instructions on <https://www.fullstory.com/output>.

20. Use of trbo

This online presence uses the web analysis services of trbo GmbH, Römerstrasse 6, 80801 Munich, Germany (<http://www.trbo.com>). Data is acquired and stored from which user profiles are created with the use of pseudonyms, in order to offer you personalised customer

benefits. For this purpose, cookies may be used which allow recognition of an internet browser. These user profiles are used for analysing visitor behaviour and are evaluated for the purpose of improving our offers and structure according to the demand. The pseudonymised user profiles are not coordinated with personal data of the persons concerned unless with their specifically granted express consent. You may opt out of this at any time by clicking on the following link: <https://track2.trbo.com/optout.php>

21. Use of iAdvize

This online presence uses the iAdvize chat function in order to offer you additional support facilities where necessary, for instance, for advice or in connection with the booking form. We do this to increase your satisfaction with our online presence.

Data for the iAdvize service are stored on your computer with cookies. Chat sessions are only temporarily stored on the iAdvize servers and are automatically deleted at the end of the conversation.

In view of the quality level of the advice we strive to provide, it may be necessary to transfer the content of the communication between you and your advisor to other advisors in our company or allow it to be seen by senior personnel. Further notes on the treatment of your data by iAdvize can be found here: <http://www.iadvize.com/de/datenschutzerklaerung/>

22. YouTube

This website uses a link to YouTube provided by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. When embedding, we use the “Extended data protection mode” so that a transfer of usage information only takes place when starting the video. In this case, it will be transmitted which specific pages of our Internet presence you have visited and which videos are viewed. When you are logged into your YouTube account, you enable YouTube to associate your page access directly with your personal profile. You can find further information on the collection and processing of your data by YouTube in the corresponding privacy policy www.youtube.com

If you would like to ensure that none of your data is stored by YouTube, do not click on the embedded videos.

23. Right of access / revocation; other rights of data subjects

You have the right:

- to obtain from us confirmation as to whether or not personal data concerning you are being processed. In particular, you can obtain information on the purposes of the processing, the categories of personal data, categories of recipients to whom your data has been or will be disclosed, the planned duration of storage, the existence of a right to rectification, erasure, restriction of processing or to object, the existence of a right to lodge a complaint, the origin of the data, if this has not been collected by us, and on the existence of automated decision-making including profiling and any meaningful information on the details.
- to obtain the immediate rectification or completion of the personal data concerning you stored by us;

- to obtain the erasure of personal data concerning you stored by us unless the processing is necessary for exercising the right of freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims;
- to obtain the restriction of processing of your personal data, where the accuracy of the personal data is contested by you, the processing is unlawful but you oppose the erasure of the personal data, or we no longer need the data, but you require them or the establishment, exercise or defence of legal claims or you have objected
- to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format or request the transmission to another controller;
- to withdraw the consent you once provided to us at any time.. This will mean that we will no longer be able to continue the data processing relating to this consent in the future, and
- to lodge a complaint with a supervisory authority. Generally, you may contact the supervisory authority at your usual place of residence or workplace or at our registered office.

In order to withdraw your consent to data usage, to exercise your right of access, or request the rectification, blocking or erasure or to exercise your other rights as a data subject, please contact:

Meeting Point Hotelmanagement Holding GmbH

Data Protection Officer

Landsberger Strasse 88

80339 Munich

Telephone: +49 (0) 89 / 25 25 0

E-mail: dataprotection@labranda.de

<https://www.labranda.com/en.html>

These rights are of course available to you free of charge, without you incurring higher transmission costs for your request than for the base rates.

24. Security, questions and remarks, controller

Security also depends ultimately on your system. You should always treat your access information as confidential, never allow your browser to save passwords and close the browser window when you leave our website. This makes it more difficult for third parties to access your personal data.

Use an operating system that can manage user rights. Always set up different user profiles, including amongst family members, and never use the internet under administrator rights. Use security software such as virus scanners and firewalls and always keep your system up to date.

The controller for this online presence as defined by the General Data Protection Regulation and other national data protection laws of Member States as well as other data protection regulations.

Meeting Point Hotelmanagement Holding GmbH

Data Protection Officer

Landsberger Strasse 88

80339 Munich

Telephone: +49 (0) 89 / 25 25 0

E-mail: dataprotection@labranda.de

<https://www.labranda.com/en.html>

25. Newsletter - unsubscribing

If you no longer wish to receive our newsletter or our advertising emails, click on the link: "Unsubscribe from newsletter " appears at the bottom of every email from us.

26. Further Information

All credit/debit cards details and personally identifiable information will NOT be stored, sold, shared, rented or leased to any third parties.

The Website Policies and Terms & Conditions may be changed or updated occasionally to meet the requirements and standards. Therefore, the customers are encouraged to frequently visit these sections in order to be updated about the changes on the website. Modifications will be effective on the day they are posted.

Some of the advertisements you see on the site are selected and delivered by third parties, such as ad networks, advertising agencies, advertisers, and audience segment providers. These third parties may collect information about you and your online activities, either on the site or on other websites, through cookies, web beacons, and other technologies in an effort to understand your interests and deliver to you advertisements that are tailored to your interests. Please remember that we do not have access to, or control over, the information these third parties may collect. The information practices of these third parties are not covered by this privacy policy.

27. Terms of Service

Any dispute or claim arising out of or in connection with this website shall be governed and construed in accordance with the laws of UAE. United Arab of Emirates is our country of domicile. Minors under the age of 18 shall are prohibited to register as a User of this website and are not allowed to transact or use the website. If you make a payment for our products or services on our website, the details you are asked to submit will be provided directly to our payment provider via a secured connection. The cardholder must retain a copy of transaction records and Merchant policies and rules. "We accept payments online using Visa and MasterCard credit/debit card in AED (or any other agreed currency)". Labranda will NOT deal or provide any services or products to any of OFAC (Office of Foreign Assets Control) sanctions countries in accordance with the law of UAE. Multiple transaction may result in multiple postings to the cardholder's monthly statement.

28. Cancellation

In the event that transaction error has occurred while making the payment , a refund in most cases will be issued to the same credit card you used for the original purchase.