

Hotel Neptun Betriebsgesellschaft mbH
Seestraße 19 18119 Rostock-Warnemünde
Tel. 0381 777 0
<https://www.hotel-neptun.de/en/data-privacy.html>



Hotel NEPTUN Betriebsgesellschaft mbH Privacy Policy

The stipulations of the [EU General Data Protection Regulation](#) (hereinafter referred to as “GDPR”) apply across Europe. We would like to inform you of the processing of personal data as carried out by our company in accordance with this regulation (compare Articles 13 and 14 GDPR). Should you have any questions or remarks regarding this privacy policy, you can send these to the email provided under paragraph 2 and/or 3 at any time.

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I. Overview

In this section of the privacy policy, you can find information regarding its scope, the controller, their data protection officer, and data security.

1. Scope

Fundamentally, the data processing carried out by Hotel NEPTUN Betriebsgesellschaft mbH can be divided into **two categories**:

- All data required for the **execution of a contract** with Hotel NEPTUN Betriebsgesellschaft mbH will be processed for the purpose of contract performance. Should external service providers also be involved in the performance of the contract, e.g.: booking and payment service providers, your data will be forwarded to these to the scope which is necessary in each case.
- Upon **accessing the website/application** of Hotel NEPTUN Betriebsgesellschaft mbH, various pieces of information will be exchanged between your end device and our server. This can also include personal data.
The information which is collected in this manner will be used, among other things, to optimise our website or to display **advertising** in your end device’s browser.

This privacy policy applies to the following offers:

- our online offer, retrievable via www.hotel-neptun.de;
- whenever reference is made to this privacy policy from one of our other offers (e.g. websites, subdomains, mobile applications, web services, or inclusions on third-party websites), irrespective of the manner in which you retrieve or use these.

All of these offers together are also referred to as “Services”.

2. Controller

The controller – i.e. the person who determines the purposes and means of the processing of personal data – in connection with the Services is

Hotel NEPTUN Betriebsgesellschaft mbH
Seestraße 19
18119 Rostock-Warnemünde
Tel. + 49 381 - 777 0
Email: datenschutz@hotel-neptun.de

3. Data Protection Officer

You can contact our Data Protection Officer as follows:

Contact form:

<https://www.dsextern.de/anfragen>

DS EXTERN GmbH
Dipl.-Kfm. Marc Althaus
Bredkamp 53a
D-22589 Hamburg

4. Data Security

In order to develop the measures required in Art. 32 GDPR and, with it, to achieve a level of protection which is appropriate to the risk, we have established an information security management system within our company.

II. Data Processing Activities in Detail

In this section of the privacy policy, we provide you with information regarding the processing of personal data within the framework of our Services in detail. For greater clarity, we have arranged this information according to specific features of our Services. When using our Services normally, various functions and thus, various processing activities, may take effect, either consecutively or simultaneously.

1. General Points concerning Data Processing Activities

The following applies to all data processing activities presented below, unless otherwise specified:

a. No Obligation to Provide Personal Data

No contractual or legal obligation to provide personal data exists. You are not obligated to provide data.

b. Consequences of Failure to Provide Personal Data

Failure to provide required data (data which is marked as a required field when it is being entered) will result in the Service in question not being able to be rendered. Otherwise, failure to provide this data will, where applicable, result in our services not being able to be rendered in the same form and quality.

c. Consent

In various cases, you have the opportunity to also give us consent to carry out further processing activities (where applicable, for only part of the data) in connection with those processing activities presented below. In this case, we provide you with information regarding all modalities and the scope of the consent, as well as regarding the purposes which we pursue with these processing activities, separately and in connection with the submission of each corresponding declaration of consent.

d. Transfer of Personal Data to Third Countries

When we transfer data to third countries, i.e. countries outside the European Union, this transfer takes place exclusively in compliance with legislative requirements placed on legitimacy.

The requirements placed on legitimacy are regulated by Art. 44-49 GDPR.

e. Hosting from External Service Providers

To a large extent, the way in which we process data involves so-called hosting service providers, which provide us with storage space and processing capacities in their data centres, and which also process personal data on our behalf and in accordance with our instructions. These service providers either exclusively process data within the EU, or we have ensured an adequate level of data protection with help from the [EU standard contractual clauses for data protection](#).

f. Transfer to Government Authorities

We transfer personal data to government authorities (including law enforcement authorities) where this is necessary for compliance with a legal obligation to which we are subject (legal basis: point (c) of Art 6(1) GDPR), or where this is necessary for the establishment, exercise or defence of legal claims (legal basis: point (f) of Art. 6(1) GDPR).

g. Storage Period

We will only store your data for as long as we require it to fulfil the respective processing purposes for which it was collected. Should this data no longer be required for the fulfilment of contractual or legal obligations, it shall be regularly erased, unless its retention continues to be necessary for a fixed term. Reasons for this could, for example, be the following:

- The fulfilment of retention obligations according to commercial and tax law
- The preservation of evidence for legal disputes within the framework of statutory limitation periods

Equally, we are able to continue to store your data if you have expressly given your consent for us to do so.

h. Data Categories

- **Personal master data:** title, salutation/gender, first name, surname, date of birth
- **Address data:** street, house number, address supplements where necessary, postcode, town, country
- **Contact data:** telephone number(s), fax number(s), email address(es)
- **Subscription data:** information regarding the Service through which you subscribed; times and technical information surrounding the subscription, confirmation, and unsubscription; data which you provided when subscribing
- **Order data:** ordered products, prices, payment and delivery information
- **Payment data:** account data, credit card details, data regarding other payment services such as PayPal
- **Access data:** date and time at which you visited our Service; the page from which the accessing system reached our page; the pages which were recalled during the use of the site; data regarding the identification of the session (session ID); furthermore, the following information from the accessing computer system: internet protocol address (IP address) used, browser type and version, device type, operating system, and similar technical information
- **Application data:** CV, references, supporting documents, work samples, certificates, pictures

2. Accessing the Website/Application

Here, we describe how the personal data which we receive from you when you access our Services is processed. We would like to make particular reference to the fact that the transfer of access data to external content suppliers (see 'b' below) is inevitable due to the way in which the transfer of information on the internet technically works.

a. Information concerning Processing				
Category of Data	Intended Purpose	Legal Basis	Legitimate Interests, where applicable	Storage Period
Access data	Establishment of the connection, presentation of the contents of the Service, the discovery of attacks on our website through unusual activity, troubleshooting	Point (f) of Art. 6(1) GDPR	Proper functioning of Services, security of data and business processes, prevention of improper use, prevention of damages through interventions in information systems	7 days
b. Recipients of Personal Data				
Category of Recipient	Affected Data	Legal Basis for the Transfer	Legitimate Interests, where applicable	
External content suppliers who provide content (e.g. pictures, videos, embedded posts from social networks, advertisement banners, fonts, update information) which is required for displaying the Service	Access data	Processing (Art. 28 GDPR)	Proper functioning of Services, (accelerated) presentation of contents	

IT security service provider	Access data	Processing (Art. 28 GDPR)	Prevention of attacks through exploitation of security holes/weak points
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3. Newsletter

We describe what happens with your personal data when you subscribe to our newsletter here:

a. Information concerning Processing				
Category of Data	Intended Purpose	Legal Basis	Legitimate Interests, where applicable	Storage Period
Email address	Verification of the subscription (double opt-in procedure), sending of the newsletter	Point (b) of Art. 6(1) GDPR		Duration of the subscription to the newsletter
Personal master data	Personalisation of the newsletter	Point (b) of Art. 6(1) GDPR		Duration of the subscription to the newsletter
Subscription data	Traceability of successful newsletter subscription/confirmation/unsubscription	Points (b) and (f) of Art. 6(1) GDPR	Evidence of successful newsletter subscription/confirmation/unsubscription	Duration of the subscription to the newsletter
Newsletter usage profile data	Design of the newsletter to serve interests	Point (f) of Art. 6(1) GDPR	Improvement of our Service, advertising purposes	Duration of the subscription to the newsletter

b. Recipients of Personal Data			
Category of Recipient	Affected Data	Legal Basis for the Transfer	Legitimate Interests, where applicable
Service provider for sending the newsletter	All data mentioned under 'a'	Processing (Art. 28 GDPR)	

4. Application

During an application process, we process your personal data as follows:

a. Information concerning Processing				
Category of Data	Intended Purpose	Legal Basis	Legitimate Interests, where applicable	Storage Period
Address data, contact data	Identification, making contact, communication regarding contract initiation	Point (b) of Art. 6(1) GDPR		6 months
Personal master data	Identification, making contact, age verification	Point (b) of Art. 6(1) GDPR		6 months
Application data	Selection of applicants	Point (b) of Art. 6(1) GDPR		6 months

5. Customer Support

Find out how we process your personal data when you get in touch with our customer service here:

a. Information concerning Processing				
Category of Data	Intended Purpose	Legal Basis	Legitimate Interests, where applicable	Storage Period
Personal master data, contact data, contents of the queries/complaints	Processing of customer queries and user complaints	Points (b) and (f) of Art. 6(1) GDPR	Customer loyalty, improvement of our Service	Processing of the query Up to 90 days max.

6. Processing of Queries

The following information describes how your personal data is processed when you agree to being put on the emailing list through queries, offers, and reservations.

a. Information concerning Processing				
Category of Data	Intended Purpose	Legal Basis	Legitimate Interests, where applicable	Storage Period
Email address	Verification of the subscription (opt-in procedure), sending of emails	Point (b) of Art. 6(1) GDPR		90 days max. after departure
Personal master data	Personalisation of emails	Point (b) of Art. 6(1) GDPR		90 days max. after departure

Subscription data	Traceability of successful email subscription/unsubscription	Points (b) and (f) of Art. 6(1) GDPR	Evidence of successful newsletter subscription/confirmation/unsubscription	90 days max. after departure
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7. Reservation

Find out how we process your personal data when you get in touch with our customer service here:

a. Information concerning Processing				
Category of Data	Intended Purpose	Legal Basis	Legitimate Interests, where applicable	Storage Period
Personal master data, contact data, contents of the queries/bookings/complaints, payment data	Processing of customer queries, bookings, and complaints	Points (b) and (f) of Art. 6(1) GDPR	Customer loyalty, sales, improvement of customer satisfaction	Processing of the query, booking data in accordance with the legal retention period (10 years)
b. Recipients of personal data				
Category of Recipient	Affected Data	Legal Basis for the Transfer	Legitimate Interests, where applicable	
Payment service provider	Payment data	Processing (Art. 28 GDPR)		

8. Reception/Stay at the Hotel NEPTUN

The following information describes how we process your personal data during your stay at the Hotel NEPTUN.

a. Information concerning Processing				
Category of Data	Intended Purpose	Legal Basis	Legitimate Interests, where applicable	Storage Period
Address data, contact data, booking data, payment data	Fulfilment of the accommodation agreement	Point (b) of Art. 6(1) GDPR		In accordance with the legal retention period (10 years)
b. Recipients of Personal Data				
Category of Recipient	Affected Data	Legal Basis for the Transfer	Legitimate Interests, where applicable	
Payment service provider	Payment data	Processing (Art. 28 GDPR)		
Reservation system providers	Booking data	Processing (Art. 28 GDPR)		
Registration offices, spa administration	Address data, booking data	Section <i>VV Meldegesetz</i> [administrative regulation of the German Registration Law]		

9. Photos and Film Recordings

Hotel NEPTUN Betriebsgesellschaft mbH events may be documented via photos and film recordings. These photos, e.g. team photos or event photos, will be used online on the respective event page. Selected photographic material of the event may be used to give an impression thereof in web resolution on social media, as well as in diverse print media. No other disclosure of photos and film recordings to third parties occurs.

The participant can object to the storage, use, and distribution of footage which has been taken of them at any time, with effect for the future. Should an objection be filed before the beginning of a Hotel NEPTUN event, Hotel NEPTUN Betriebsgesellschaft mbH will erase all footage of the participant after the end of the event without delay. The objection can be declared in writing (e.g. letter) or in text form (e.g. by fax or email). When filing your objection, please submit your first and surname, as well as the date and name of the event.

10. Tracking

Below, we shall describe how, with help from tracking technologies, your personal data is processed for the analysis and optimisation of our Services, as well as for advertising purposes.

The description of tracking procedures also contains information on how you can prevent or object to data processing. Please take note that the so-called “opt-out” declaration, i.e. the rejection of processing, is generally saved via cookies. If you use our Services via a new end device or in another browser, or when you have deleted the cookies placed by your browser, you must declare your rejection once more.

The tracking procedures presented only process personal data in pseudonymised form. A connection with a concrete, identifiable natural person, i.e. a merging of the data with information about the bearer of the pseudonym, does not occur.

a. Tracking for the analysis and optimisation of our Services and their use, as well for the measurement of the success of advertising campaigns and optimisation of the display of advertisements

(1) Purposes of the Processing

Analysing user behaviour through tracking helps us to review the effectiveness of our Services, to optimise them and adjust them to meet the needs of the user, as well as to resolve errors. Furthermore, it serves the purpose of establishing specific values in regards to our Services (reach, intensity of use, surfing behaviour of the user) statistically – on the basis of uniform, standard processes – and thus of receiving values which are comparable across the market.

Tracking for the measurement of the success of advertising campaigns serves to optimise our advertisements for the future, as well as to enable marketers and advertisers a corresponding optimisation of their advertisements. Tracking for the optimisation of the display of advertisements serves the purpose of showing users advertising which is tailored to their interests, in order to increase the success, and thus the revenues, of advertising.

(2) Legal Basis of the Processing

When it comes to Services which enable the behaviour of data subjects to be traced on the internet, and when creating user profiles, an informed consent within the meaning of GDPR is required.

(3) The Tracking Procedures Used in Detail

Name of the Service	Operating Principle	Possibility to Prevent Processing (Opt-out)	Transfer of Data to Third Countries?	Adequacy Decision (Art. 45 GDPR), where applicable	Appropriate Safeguards (Art. 46 GDPR), where applicable
Google Analytics	Web analysis	tools.google.com/dlpage/gaoptout?hl=en	No		

If you would like to decide against interests-based advertising, you can also visit the website <http://youronlinechoices.com/>, click on “Your Ad Choices” and follow the instructions in order to either completely prohibit the use of your data for interests-based advertising for those service providers which are listed there, or to create custom settings. You will continue to receive advertisements, however, these will no longer be based on your interests.

11. Social Media Plug-ins

Where appropriate, this website contains additional programs (plug-ins) from social networks, such as Facebook, Google+, Twitter or Pinterest, which are operated by third parties and through which information can be transferred to the corresponding social network via a button in order to, for example, evaluate, recommend, or share content. In doing so, we pursue the purpose and legitimate interest of making our Services more well-known. We configure our Services in such a way that a data transfer can only take place after you have pressed the button. In this case, the legal basis for the data transfer is point (f) of Art. 6(1) GDPR. Each provider is responsible for processing the transferred data in accordance with data protection law.

Name of the Service	Provider	Provider’s Data Security Information
Facebook	Facebook Inc., 1601 S. California Avenue, Palo Alto, CA 94304, USA	https://facebook.com/about/privacy/

Google+	Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA	https://www.google.com/+policy/pagesterm.html
Twitter	Twitter Inc., 539 Bryant Street, Suite 402, San Francisco, CA 94107, USA	https://twitter.com/en/privacy
Pinterest	Pinterest Inc., 635 High Street, Palo Alto, CA, USA	https://policy.pinterest.com/en/privacy-policy
Instagram	Instagram LLC, 1601 Willow Rd, Menlo Park, CA 94025, USA	https://help.instagram.com/519522125107875
YouTube	Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA	https://www.google.com/+policy/pagesterm.html

III. Rights of Data Subjects

1. Right to Object

If we process your personal data for the purposes of direct advertising, you have the right to object at any time to the processing of personal data about your person for such advertising purposes with effect for the future; insofar as it is associated with such direct advertising, this also applies to profiling.

Furthermore, you have the right to object at any time, on grounds relating to your particular situation and with effect for the future, to the processing of personal data about your person that is based on point (e) or (f) of Art. 6(1) GDPR; this also applies to profiling based on these provisions.

You may exercise your right to object free of charge.

You can contact us via the contact details stated in I.2.

2. Right of Access

You have the right to learn whether personal data concerning your person is being processed by us, what personal data this concerns, where applicable, as well as additional information in accordance with Art. 15 GDPR.

3. **Right to Rectification**

You have the right to request that we immediately rectify inaccurate personal data concerning your person (Art. 16 GDPR). Taking the purposes of processing into consideration, you have the right to request the completion of incomplete personal data – also by way of a supplementary declaration.

4. **Right to Erasure (“Right to be Forgotten”)**

You have the right to request that personal data concerning your person be deleted immediately, insofar as one of the reasons listed in Art. 17(1) GDPR is applicable, and insofar as the processing of the data is not required for a purpose as regulated in Art. 17(3) GDPR.

5. **Right to Restriction of Processing**

You are entitled to request the restriction of the processing of your personal data in the case of the existence of one of the conditions set out in points (a) to (d) of Art. 18(1) GDPR.

6. **Right to Data Portability**

You have the right to receive any personal data related to you that you have provided us in a structured, commonly used, and machine-readable format. Furthermore, you have the right to transmit this data to another controller without hindrance from us, or to have this data transmitted directly from us, insofar as this is technically feasible. This shall always apply when the basis of the data processing is consent or a contract, and where the data is automatically processed. Thus, this does not apply to data which is only available in paper form.

7. **Right to Withdrawal of Consent**

Insofar as processing takes place based on your consent, you have the right to withdraw that consent at any time. In doing so, the lawfulness of the processing which was carried out based on consent until the time of its withdrawal shall not be affected.

8. **Right to Lodge a Complaint**

You have the right to lodge a complaint with a supervisory authority.

IV. Glossary

Processor: A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Browser: A computer program for displaying websites (e.g. Chrome, Firefox, Safari)

Cookies: In the context of the world wide web, a cookie describes a small text file which is stored locally on the user's computer when they visit a website. This file saves data regarding the behaviour of the user. If the browser is opened and the corresponding website is visited repeatedly, the cookie comes into use and gives the web server information about the surfing behaviour of the user via the data which it has saved.

Thus, in this context, when it comes to cookies we are not talking about biscuits, but rather about information which a website saves locally on a website visitor's computer in the form of a small text file. This information can be settings carried out by the user on a website, as well as information which the website has collected from the user completely independently. These locally-placed text files can then later be read by the same web server which placed them. Most browsers accept cookies automatically. You can manage cookies through your browser functions (usually under "Options" or "Settings"). In doing so, the saving of cookies can be deactivated, made dependent on your approval on a case-by-case basis, or otherwise restricted. You can also delete cookies at any time.

Third countries: A country which is not bound by the legal requirements of the EU directive on data protection (a country outside the EEA)

Personal data: Any information relating to an identified or identifiable natural person. 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.

Pixels: Pixels are also called tracking pixels, web beacons, or web bugs. These are small, invisible graphics in HTML emails or on websites. If a document is opened, then this small picture is loaded from an internet server, whereby the fact that it has been downloaded is registered on said server. In this manner, the operator of the server can see if and when an email was opened or a website was visited. This function is usually carried out by accessing a small program (JavaScript). In this way, specific types of information can be recognised on your computer system and forwarded, such as the content of cookies, the time and date the page was accessed, as well as a description of the page upon which the tracking pixel is to be found.

Profiling: Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements

Services: Our offers, to which this privacy policy applies (see [Scope](#)).

Tracking: The collection of data and its evaluation as regards the behaviour of visitors when using our Services.

Tracking technologies: Tracking can take place through the activity logs (log files) which are saved on our web servers, as well as through the collection of data from your end device via pixels, cookies, and other similar tracking technologies.

Processing: Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

