

## Privacy Policy Statement

### Privacy Policy

The owner of this website is responsible for processing your personal information. Details on the company can be found in the [imprint](#).

We take the protection of your personal data very seriously. Your personal data will be treated confidentially and in line with both the data protection laws as well as the provisions set out in this data protection declaration.

It is possible to use our website without submitting your personal data. If you are asked to give personal data (e.g. name, postal address or e-mail address), this is always – as far as possible – always on a voluntary basis.

**Company**, Rebecca Hitchcock & Mitbesitzer

**Location**: Höhlebachstr. 20 6167 Neustift

Commercial court of registration: Innsbruck, VAT ATU66742135

#### **We use the following data when you enter into an agreement with us:**

##### **Personal data**

First and last name, full address, all contact information (e.g., email address, telephone number), information about the type of agreement and its contents.

**Other personal data** you provide or a third party provides with your consent, or data that is otherwise permitted at the time you initiate the agreement, throughout the contractual relationship (e.g., when the guest card is issued), or for the purpose of complying with statutory regulations:

Date of birth or age, marital status, gender, profession, identification card details, bank account information, signatory or representative authority, contractual obligation, cancellation deadlines, or other personal information **you have provided yourself.**

#### **Processing Partners, Recipients**

We process your personal data with in cooperation with processing partners who support us in providing our services (e.g. web-hosting, e-mail newsletter distribution).

These processing partners are committed to handling your data in a strictly confidential way and may not use your personal data for any other purpose than providing our services.

Your personal data will only be passed on to service providers such as banks (if you receive money transfers), tax advisors (if you are part of our accounting), distributors (if you receive mail from us), etc.

## Processing Partners:

Protecting your data is very important to us. We take the protection of your personal data very seriously. Our order-preparer with whom we have a contract with:

Municipality Software: Feratel media technologies AG, FN 72841w Maria Theresien Straße 8, A – 6020 Innsbruck **(guest register in accordance with § 19 of the Austrian Registration Law (MeldeV)) & Regionscard – Stubai Super Card)**

Hotelsoftware & Homepage: Zadego GmbH Tschamlerstraße 4 6020 Innsbruck (Österreich) Tel.: +43 5 09 08 E-Mail: [office@easybooking.eu](mailto:office@easybooking.eu) Homepage: [www.easybooking.eu](http://www.easybooking.eu) **(Homepage and Hotelsoftware with Channelmanger)**

Tourist Office Stubai: Tourismusverband Stubai Tirol KÖR Stubaitalhaus, & Stubai Touristik BgA Dorf 3 6167 Neustift, Tirol Österreich [info@stubai.at](mailto:info@stubai.at) <http://www.stubai.at> +43 501 881 0 f:+43 501 881 199 **(Guest data after § 19 MeldeV & Region-card – Stubai Super Card)**

### **Booking.com – Booking system & Channelmanager**

These processing partners are committed to handling your data in a strictly confidential way and may not use your personal data for any other purpose than providing our services.

## SSL or TLS encryption

This site uses SSL or TLS encryption for security reasons and for the protection of the transmission of confidential content, such as the inquiries you send to us as the site operator. You can recognize an encrypted connection in your browser's address line when it changes from "http://" to "https://" and the lock icon is displayed in your browser's address bar.

If SSL or TLS encryption is activated, the data you transfer to us cannot be read by third parties.

we ensure that the data is processed within the European Union.

## **Contact Form**

Once you have filled in and sent a contact form your personal data provided will be processed by the person responsible in order to answer your enquiry based on the consent you have given by submitting the contact form.

There is no legal or contractual obligation to provide personal data. Choosing to not provide personal data simply means that your enquiry will not be sent to us and we will not be able to process it.

You have the right to withdraw your consent in written at any time form. This withdrawal of consent shall have no impact on the legality of data processing activity up to the point in time when consent was withdrawn.

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## **Registration data**

### **1.1 Registration obligation**

According to the Austrian Registration Law, you are required to register with us and provide us with the data specified in § 5 and § 10 of the Austrian Registration Law. This applies to the following data:

*Name, date of birth, gender, nationality, country of origin, and address with postal code. Foreign guests are also required to provide the type of travel document they are traveling with, its number, place of issue and issuing authority, as well as date of arrival and departure.*

### **1.2. Guest register**

We are required by law to keep this data in a guest register as stipulated by § 19 of the Austrian Registration Law and save it for seven (7) years unless it is processed for a longer period of time for other reasons specified by this privacy policy.

We administer the guest register electronically and forward the data to an IT processor, where the data is saved locally. The data is not transferred to a third country.

### **1.3. Forwarding of data**

Arrival and departure data, together with country of origin, is forwarded in accordance with § 6 of the Regulation on Tourism Statistics (Tourismus-Statistik-Verordnung) to the municipality in which our tourist accommodation establishment is located. Aggregated data about the total number of overnight stays and the names of persons required to pay a local tourist tax are also forwarded to the respective tourism association Tourismusverband Stubai Tirol Kör (Tourist Office in Stubai) to which we belong. This is done in accordance with § 9 of the Tyrolean Regulation on Local Tourist Tax (Tiroler Aufenthaltsabgabegesetz).

### **1.4 Legal basis for data processing**

The processing of data as specified above in items 1.1 to 1.3 is based on Art. 6, para. 1, lit. c GDPR (fulfillment of legal obligation).

### **1.5 Additional data forwarded to the tourism association/municipality**

We also forward your postal code and year of birth (in pseudonymized and anonymized form) to our municipality and our tourism association. This is done for statistical purposes so that the tourism association can create and evaluate statistics on country of origin and age. The data is forwarded in accordance with Art. 6, para. 1, lit. e (public interest) and lit. f (legitimate prevailing interests) GDPR. You can file an objection at any time for reasons resulting from your particular situation (Art. 21, para. 1 GDPR).

## **2. Guest card**

### **2.1 General information**

You can make use of a guest card. A guest card offers discounts and/or services provided by various regional businesses (e.g., discounted admission). The guest card is valid for the duration of your stay with us.

### **2.2 Issuing of guest cards**

Guest cards are issued by the accommodation provider upon request only. Depending on the guest card system used by the tourist association and/or tourist accommodation establishment, you will be issued one of the following:

- Electronically generated guest card,
- Manually created guest card
- Carbon copy of the registration form.

### **3.1 Processed personal data – Guest card system – Stubai Super Card**

#### **Consent via booking confirmation: Guest card system – Stubai super Card**

For both the electronically generated and manually created guest card, the following personal data, which is taken from the registered data (see item 1 above), is processed:

First name, last name, date of birth and duration of stay (arrival/departure), country of origin, postal code.

If the guest card is issued as a carbon copy of the registration form, it includes information as stipulated in § 5 in conjunction with § 9 of the Austrian Registration Law (see 1.1 Registration data). In this case, the data is not processed electronically for guest card purposes.

The following additional personal data is processed when the guest card is used: data about the card's usage frequency, services used, bookings, transaction logging, billing data, reference to registered data and the tourist accommodation establishment.

This data is required to determine, on the one hand, your identity, and on the other hand, to determine the guest card's duration of validity at the respective service provider's establishment. It also facilitates the settlement of discounts between the service providers, the tourism association, and if need be, the tourist accommodation establishments.

### **3.2 Legal basis for data processing**

Data is processed for guest card purposes, based either on your consent (Art. 6, para. 1, lit. a GDPR) or, for the purpose of contractual performance (Art. 6, para. 1, lit. b GDPR), if the guest card is part of service provisioning as specified in the accommodation agreement.

You may revoke your consent at any time by notifying the accommodation provider verbally or by sending an email to the following address: **info@stubai-ferienwohnung.at**.

### **3.3 Guest card system administration**

The guest card system is managed by the local tourism association. Other parties involved are the local tourist accommodation establishments and local companies (service providers).

Data that is processed for guest cards is deleted after forty-eight (48) months.

### **3.4 Data recipients**

Data processed for guest card purposes is forwarded to the local tourism association to facilitate the billing of service providers and/or tourist accommodation establishments.

Individual service providers, who honor the guest card and offer discounted services, also receive this data when you use services provided by these establishments that are offered through the guest card.

To claim discounts, you must present the card containing this data to the service provider. The establishment then checks if the card is (still) valid, usually by scanning the barcode on the guest card and then by transferring the barcode data to our IT processor. At this time, personal data is also transferred to the establishment, in particular, data about your identity (to verify identity and date of birth).

If the guest card is a carbon copy of the registration form, the establishment verifies its validity by means of the carbon copy of the registration form.

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### **Other processing of your data**

As a rule, we process only data that is absolutely necessary to conclude and execute the agreement. However, upon your consent and until revoked, we will also provide you with information about our services. We will send you information via the following communication channels if you have given us the respective data:

Telephone, email, mobile number for texts, address, social media information

#### **1. Deleting data**

Your personal data and other personal data are deleted if it is no longer required for compliance with retention laws, typically after seven (7) years, or if saving the data is not permitted according to the law.

In lieu of deleting the data, it is also possible to anonymize it, which means that any reference to a person is irrevocably removed.

#### **2. Cookies**

Our website uses cookies. Cookies are small text files that are stored on your device via your browser. They are not malicious.

We use cookies to customize our offers to your needs and interests. Some cookies remain on your device until you delete them. They make it possible for us to recognize your browser the next time you visit.

If you do not want cookies to be placed on your device, you can change the settings in your browser so that you are informed when cookies appear and allow them in individual instances only.

Our website functionality can be limited by the deactivation of cookies.

### **3. Google Analytics**

This website uses Google Analytics, a web analysis service operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics is based on the legal principle of overriding legitimate interest (analysis of website use). To this end we have concluded an agreement with Google on contracted data processing.

When you visit our website, a piece of software creates a connection to Google servers and data is sent to these servers, some of which are located in the USA. Google Analytics also uses cookies to save information about the website user as well as to analyse how visitors use this website.

This website uses the function "Activation of IP anonymisation". This means that within Member States of the European Union and countries of the European Economic Area your IP address will be shortened. Only in exceptional circumstances will the full IP address be sent to a Google server in the USA and shortened there

According to Google, this data is used to analyse the use of the website, produce reports on website activity and provide additional services connected to use of the website and the internet.

Google may also transfer this information to third parties if this is legally required or if the third party is tasked with processing the data on behalf of Google.

For detailed information on the use of data by Google Analytics please consult the data protection declaration of [Google](#) and [Google Analytics](#).

### **4. Google Analytics Remarketing**

Our websites use the features of Google Analytics Remarketing combined with the cross-device capabilities of Google AdWords and DoubleClick. This service is provided by Google Inc., 1600 Amphitheater Parkway, Mountain View, CA 94043, USA.

This feature makes it possible to link target audiences for promotional marketing created with Google Analytics Remarketing to the cross-device

capabilities of Google AdWords and Google DoubleClick. This allows advertising to be displayed based on your personal interests, identified based on your previous usage and surfing behavior on one device (e.g. your mobile phone), on other devices (such as a tablet or computer).

Once you have given your consent, Google will associate your web and app browsing history with your Google Account for this purpose. That way, any device that signs in to your Google Account can use the same personalized promotional messaging.

To support this feature, Google Analytics collects Google-authenticated IDs of users that are temporarily linked to our Google Analytics data to define and create audiences for cross-device ad promotion.

You can permanently opt out of cross-device remarketing/targeting by turning off personalized advertising in your Google Account; follow [this link](#).

The aggregation of the data collected in your Google Account data is based solely on your consent, which you may give or withdraw from Google per Art. 6 (1) (a) DSGVO. For data collection operations not merged into your Google Account (for example, because you do not have a Google Account or have objected to the merge), the collection of data is based on Art. 6 (1) (f) DSGVO. The website operator has a legitimate interest in analyzing anonymous user behavior for promotional purposes.

For more information read the [Google Privacy Policy](#).

### **Deactivating Google Analytics**

- It is possible to prevent **our website** from collecting your user data by activating the “Do Not Track” function in your web browser. Your web browser will then send a “Do Not Track” signal to all websites, including ours.
- You can prevent **all websites** from collecting your user data by downloading the following extension and installing it on your computer: [Download Browser Extension](#).
- You can prevent **only our website** from collecting your user data via Google Analytics by clicking on the following link. This places an opt-out cookie on your computer, which prevents data being collected from you if you visit this website again. [Deactivate Google Analytics](#).

## **5. Newsletter**

You can subscribe to our newsletter through our website. To do this you must enter your email address and give your consent to receive the newsletter.

In order to provide you with information that is most relevant to you, we also collect data you have voluntarily provided, such as data about your interests, your birthday, and postal code.

You can unsubscribe from the newsletter at any time. Send your unsubscribe request to the following email address: [info@stubai-ferienwohnung.at]. We will then immediately delete your data used for newsletter distribution.

## 6. Social media plug-ins

The establishment uses embedded social media plug-ins on its website (interfaces to social networks). When you visit its website, the system uses the plug-ins to automatically establish a connection to the respective social network and transfers the data (IP address, website visit, etc.).

The establishment does not assist with the data transfer and is not responsible for the transfer. The user can prevent the transfer of this data by logging out of his social networks before visiting the website. The social network is able to link specific data to the activity profile of the user through automatic data transfer only when the user is logged in.

The automatically transferred data is used exclusively by the social network providers and not by the tourist accommodation establishment. More information, including information about the content of the data being collected by social networks, can be found directly on the website of the respective social network. Changes to social media privacy settings can also be made there.

Social networks connected to the website are:

- **Facebook ("like")**

Facebook Inc., 1601 S California Ave, Palo Alto, CA, 94304, USA  
For more information, see: <https://www.facebook.com/policy.php>

- **Twitter**

Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA  
For more information, see: <https://twitter.com/en/privacy>

- **Google („+1“)**

Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA  
For more information, see: <https://policies.google.com/terms?hl=en>

- **Instagram**

Instagram, LLC Instagram Inc., 1601 Willow Road, Menlo Park, CA 94025, USA  
For more information, see: <https://help.instagram.com/155833707900388>

## 7. Facebook Pixel

This website uses Facebook Pixel, a web analysis service operated by Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland ("Facebook") based on the legal principle of overriding legitimate interest (analysis of website use). We have concluded an agreement with Facebook on contracted data processing. In some cases data will be transferred to the USA. This transfer of data to the USA takes place on the basis of the Privacy Shield.

When you visit our website a piece of software creates a connection to Facebook's servers and sends data to these servers, some of which are located in the USA. Facebook Pixel also uses cookies to save information about the website user and to analyse how the website user uses the website.

According to Facebook, this data is used to analyse the use of the website, produce reports on website activity and provide additional services connected to use of the website and the internet.

Facebook may also transfer this information to third parties if this is legally required or if the third party is tasked with processing the data on behalf of Facebook.

We use Facebook Custom Audience as well as other tools offered by Facebook to advertise on websites like Facebook. In order to do this we share your data with providers like Facebook and use Cookies and similar technology on our website to analyze how effective our ads are on these third party platforms.

For detailed information on the use of data by Facebook please consult [Facebook's data protection declaration](#).

### Deactivating Facebook Pixel

- It is possible to prevent **our website** from collecting your user data by activating the "Do Not Track" function in your web browser. Your web browser will then send a "Do Not Track" signal to all websites, including ours.
- You can prevent this website from collecting your data via Facebook Pixel by clicking on the following link. This places an opt-out cookie on your computer, which prevents data from being collected from you if you visit this website again. [Deactivate Facebook Pixel](#).

## **“Share”-Buttons**

Some pages of our website have buttons which allow users to share the content on social media platforms such as Facebook, Google Plus, Instagram, LinkedIn, Pinterest, Tumblr, Twitter, XING and YouTube.

These buttons have been designed to protect personal data. The script (computer programme) behind the buttons does **not collect or process any personal data**. Detailed information on the function of these buttons is [available](#) from Heise Verlag, the company which publishes the IT journal c't and is also responsible for developing the buttons.

Website visitors who wish to share our website can click on one of these buttons. They will be forwarded to the “share” page of the respective social media platform. Only there will the scripts be loaded which are needed in order to share the content of the website. This sharing of information is subject to the terms and conditions as well as the data protection provisions of the respective social media platform. For more information visit [Facebook](#), [Google Plus](#), [Instagram](#), [Linkedin](#), [Pinterest](#), [Tumblr](#), [Twitter](#), [XING](#) und [Youtube](#).

### **You have the following rights in regards to the processing of your data:**

#### **1.1 Right to information:**

You have the right to know if we are processing your data and to what extent.

**Contact/person responsible:**

Rebecca Hitchcock Email: [info@stubai-ferienwohnung.at](mailto:info@stubai-ferienwohnung.at)

#### **1.2 Your rights:**

You have the right to know which personal data has been collected, to request that this data be corrected or deleted as well as to limit or object to the use of your personal data.

Provided the processing of your personal data is based on your consent or an agreement which has been concluded with you, you also have the right to request that this data be sent to you.

Furthermore, you have the right to withdraw any consent you have given for your data to be processed. This withdrawal of consent shall have no impact on the legality of data processing activity up to the point in time when consent was withdrawn.

You have the right to object to the processing of your personal data for the purposes of direct advertising. In this case your personal data will no longer be used for direct advertising.

If there are any misunderstanding or you would like to change/withdraw your personal data please contact: [info@stubai-ferienwohnung.at](mailto:info@stubai-ferienwohnung.at) we will accept your wish.

In addition, you also have the right to submit a complaint to the Austrian Data Protection Authority (Austrian Data Protection Authority, Wickenburggasse 8, 1080 Vienna, Austria [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)).

### **1.3 Right of appeal:**

If you believe the processing of your personal data violates the Austrian or European Data Protection Law, please contact us to clarify any questions you may have. Email: [info@stubai-ferienwohnung.at](mailto:info@stubai-ferienwohnung.at)

Of course you have the right to file a complaint with the Austrian Data Protection Authority or a regulatory authority within the EU. (Österreichische Datenschutzbehörde, Wickenburggasse 8, 1080 Wien, [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at))

### **1.4 Confirmation of identity:**

To protect your rights and your privacy, we may request that you provide proof of identity in case of doubt.

### **1.5 Claim to rights for a fee:**

If the complaint is deemed manifestly unfounded or is lodged particularly often, we have the right to charge a reasonable processing fee or to reject complaint processing.

### **1.6 Responsibility to cooperate:**

As part of our responsibility to cooperate, we are obligated to provide data as stipulated by statutory regulations (e.g., Austrian Federal Fiscal Code (BAO), Austrian Registration Law (Meldegesetz), Austrian Code of Civil Procedure (ZPO), Austrian Code of Criminal Procedure (StPO), etc.) upon request.

### **Period of validity:**

This privacy policy shall take effect May 25, 2018, and replaces existing data protection regulations.