

# Privacy Notice

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## 1. Controller and Data Protection Officer Information

This Data Privacy Statement is to inform you about the nature, scope and purpose of Gebr. Heinemann SE & Co. KG' ("Heinemann", "we", "us") processing of personal data.

The data controller for the processing is Gebr. Heinemann SE & Co. KG. (Koreastraße 3, 20457 Hamburg, Germany).

Our Data Protection Officer can be contacted at the following e-mail address: [dataprotection@gebr-heinemann.de](mailto:dataprotection@gebr-heinemann.de).

## 2. Processing Activities

### 2.1 Processing of Logfiles when visiting the website

When visiting our website, personal data is automatically transmitted by the user's terminal device; this includes the name of the website accessed, file, date and time of access, amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider.

#### Legal basis

The processing of this information is based on our legitimate interest according to Art. 6 (1) (f) GDPR in ensuring the proper operation of the website, including the smooth set-up of the connection and in ensuring the security of the processing (e.g. for the prevention and investigation of cyber attacks) pursuant to Art. (5) (f) GDPR.

#### Retention period

The log files are automatically anonymized at the end of the session.

### 2.2 Processing of your flight data

As a member of our loyalty program, you could voluntarily provide us with information about planned trips (e.g. departure date or departure airport). We process this data together with your e-mail address and use the information exclusively to show you relevant offers at your point of departure shortly before you start your journey and to provide you with suitable offers for your preferred airports based on the travel information you have previously shared.

#### Legal basis

Your flight data is processed on the basis of your consent in accordance with Art. 6 (1) (a) GDPR. You can revoke this consent at any time with effect for the future without incurring any disadvantages for you.

## Retention period

The flight data you provide will generally be stored for the duration of your membership in the Loyalty Program, insofar as this is necessary for the aforementioned purposes.

### 3. Sharing personal data with third parties

Besides what is described above, disclosure of personal data to third parties only occurs within the framework of legal requirements. We only disclose personal data of users to third parties, if this is required e.g. for billing purposes or other purposes, if the disclosure is necessary to ensure the fulfilment of contractual obligations towards the users (in accordance with Article 6 (1) (b) of the GDPR). We may also disclose personal data to accountants, lawyers and other external advisors based on our legitimate interests in professional consulting services (in accordance with Article 6 (1) (f) of the GDPR).

If we engage subcontractors (Group companies and IT service providers), we have made appropriate contractual arrangements as well as adequate technical and organizational measures with these companies.

If we transfer your personal data to recipients whose registered offices are located in a third country, such transfer is based on the EU-U.S. Data Privacy Framework, other adequacy decisions, or the EU Commission's standard contractual clauses which you may obtain a copy of by contacting us as stated above.

### 4. Data Subject Rights

You have the following rights with regard to the processing of your personal data:

1. Right of access (Article 15 GDPR)
2. Right to rectification (Article 16 GDPR)
3. Right to erasure ("right to be forgotten") (Article 17 GDPR)
4. Right to restriction of processing (Article 18 GDPR)
5. Right to data portability (Article 20 GDPR)
6. Right not to be subject to a decision based solely on automated processing, including profiling, where applicable (Article 22 GDPR)
7. Right to lodge a complaint with a competent data protection supervisory authority (Article 77 GDPR)
8. Right to withdraw consent at any time, where processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) GDPR, without affecting the lawfulness of processing prior to withdrawal



## 5. Right to Object (Art. 21 GDPR)

You have at any time the right to object to processing, on the grounds relating to your particular situation, to processing your personal data concerning you which is based on point (e) or (f) of Article 6 (1) GDPR, including profiling based on those provisions. In case of objection, we will no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms of you or for the establishment, exercise or defence of legal claims.

**Where your personal data are processed for direct marketing purposes, you have the right to object to such processing at any time. In this case, your personal data will no longer be processed for such purposes.**

## 6. Automated Decision-Making including profiling

There is no profiling with legal or comparably significant effect within the meaning of Art. 22 GDPR.