

# TOP TRAVEL

## REISEN Ges.m.b.H

### **DATA PROTECTION REGULATIONS acc. to EU-GDPR**

#### **1 General Regulations**

TOP TRAVEL REISEN Ges.m.b.H. reserves the right to amend the existing data protection regulations in strict accordance with prevailing legal norms at any time.

##### **1.1 Personal Data**

Your voluntarily transmitted personal details (through submission in the online forms, by phone or mail, respectively sent by your group coordinator) will be collected, saved and processed in accordance with the most recent legislation on data protection (EU-GDPR 2018).

Flight bookings, ground handling and additional bookings, hotel bookings: Bookings via TOP TRAVEL REISEN Ges.m.b.H. can only be carried out by collecting, saving and processing your personal data. This is solely for the purpose of organising and realising the event. Your data will only be passed on to third parties who are directly involved in running the event and if the organisational process makes it necessary – in accordance with your bookings (airline, hotel, transport companies, travel insurance, etc.).

##### **1.2 Photos/Films**

By signing the contract, you grant permission to TOP TRAVEL REISEN Ges.m.b.H. to use photos/films taken from you respectively your company presence by our official photographer (team) onsite during the meeting for marketing purposes (event reporting, promotion of follow-up events & self-marketing) for an indefinite period of time. If you do not want to have any photos/films published, taken of you, you may contact us at any time: [datenschutz@toptravel.at](mailto:datenschutz@toptravel.at)

##### **1.3 Links to other websites**

Links provided by TOP TRAVEL REISEN Ges.m.b.H. (program booklets, invitation management etc.) may contain links to other websites. TOP TRAVEL REISEN is not responsible for the data you provide on other websites. Our partner companies are also bound to act according to EU-GDPR, the implementation however rests with each company individually. Our data protection guidelines are solely applicable to data controlled by us (TOP TRAVEL REISEN).

### **2 Information Obligation acc. to Art. 12-14 EU-GDPR (EU-DSGVO)**

#### **2.1. Controller:**

TOP TRAVEL REISEN Ges.m.b.H. - Burgring 1 - 1010 Wien

T: +43 1 586 13 31 0

E-Mail: [datenschutz@toptravel.at](mailto:datenschutz@toptravel.at)

data protection coordinator: Gerda Knapp

responsible managers: Gerda Knapp / Mag. Gregor Kadanka

We are pleased to provide you with all information on the type, purpose and scope of the processing activities of your personal data.

#### **2.2 Purposes of Processing**

Depending on the participant status and the bookings of the data subject, the data are processed for one or more of the purposes listed below.

<b>processing Purpose</b>	<b>data categories</b>
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A-1010 WIEN, BURGRING 1 / 5

TEL.: +43 / 1 / 586 13 31 – 0 ; FAX.: +43 / 1 / 586 13 31 – 11

Email: [datenschutz@toptravel.at](mailto:datenschutz@toptravel.at)

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<p>offers, planning and organisation of all kind of travel and additional bookings</p> <p>providing of travelplans and travelinformation</p> <p>offers, planning and organisation of meetings and events</p> <p>settlement and controlling</p>	<p>name</p> <p>contact data (mail, phone number...)</p> <p>company / cost accounts (for company bookings)</p> <p>address data / invoice data</p> <p>kind of payment / credit cards</p> <p>hotel</p> <p>destinations</p> <p>contact person</p> <p>frequent flyer number</p> <p>travel data and passport data (only if necessary),</p> <p>special diet (sensitive data)</p> <p>special request according to client request - f.e. special diet (flight, restaurants, hotels) or special health information (for flight, hotels...)</p>
<p>general organisation / accounting</p>	<p>name</p> <p>contact data</p> <p>address data / invoice data</p> <p>additional bookings</p> <p>booking/traveldata</p> <p>bank details (if necessary)</p> <p>credit card (if necessary)</p>
<p>marketing &amp; development</p>	<p>name</p> <p>contact data</p> <p>photo / film</p>

### 2.3 Legal Basis for the data processing purposes

processing purpose	legal basis
<p>offers, planning and organisation of all kind of travel and additional bookings</p> <p>providing of travelplans and travelinformation</p> <p>offers, planning and organisation of meetings and events</p> <p>settlement and controlling</p>	<p>binding completion of the booking (flight, hotel, car rental, etc)</p> <p>written confirmation of the group coordinator, travel organizer or participant that participant data may be used</p> <p>binding booking of a travel insurance of the data subject (TOP TRAVEL Reisen acts as intermediary only)</p> <p>consent of the data subject (sensitive data)</p> <p>legal obligations</p> <p style="text-align: center;">-</p>
<p>marketing &amp; development</p>	<p>legitimate interest of the controller (see item 4.1 - 4.2.)</p>

### 2.4. Third party data recipients - categories

A-1010 WIEN, BURGRING 1 / 5  
 TEL.: +43 / 1 / 586 13 31 – 0 ; FAX.: +43 / 1 / 586 13 31 – 11  
 Email: [datenschutz@toptravel.at](mailto:datenschutz@toptravel.at)

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The recipients only receive the data they require, not your full data record. Your data will only be forwarded if the organisational process makes it necessary – in accordance with your bookings – and if a legal basis exists.

processing purpose	data categories	recipient categories
offers, planning and organisation of all kind of travel and additional bookings	name contact data (mail, phone number...)	flight companies, service providers (fulfillment agents)
providing of travelplans and travelinformation	company / cost accounts (for company bookings) address data / invoice data kind of payment / credit cards hotel	
offers, planning and organisation of meetings and events	destinations contact person frequent flyer number travel data and passport data (only if necessary),	
settlement and controlling	special request according to client request - f.e. special diet (flight, restaurants, hotels) or special health information (for flight, hotels...)	flight companies  hotels/restaurants/ catering (if necessary)
general organisation / accounting	name contact data registration data additional bookings hotel booking data bank data (if necessary) credit card data (if necessary)	responsible authorities, bank, fiscal office, tax consultant, service providers (fulfillment agents)
marketing	name contact data	online mailing provider

### 2.5 Transfer to Third Country

Due to the GDPR Art 49, 1b: The transfer of data to third countries is necessary for the performance of a contract/business relation between the data subject and the controller. Only data that is actually required for the specified purpose may be collected and processed.

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### 2.6 Data Storage Period

We store data according to the length of our business relationship and according to the storage periods regulated by law. Sensitive data (for example: special nutritional requirements), which are collected with the consent of the data subject, will be irrecoverably deleted after the end of the booking. All other data are stored for 7 years, to meet the retention period according to the Austrian Value Added Tax Act 1994 (Umsatzsteuergesetz 1994).

### 3 Data Subject Rights

We hereby inform you about your rights according to EU-GDPR:

#### 3.1 Data Subject Rights acc. to Art. 15-21 EU-GDPR:

- Right of access by the data subject
- Right to rectification
- Right to erasure 'right to be forgotten'
- Right to restriction of processing
- Right to data portability
- Right to object (in case of legitimate interest of the controller)

Here you will find detailed descriptions:

<http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN>

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#### 3.2 Right to withdraw consent acc. to Art. 7 EU-GDPR

Depending on your participant status, we kindly ask you for different declarations of consent. These are queried within the online forms or directly inquired from the affected person/group coordinator/company representative. The declarations of consent are not compulsory according to the EU GDPR. Each data subject has the right to withdraw his/her given consent(s) at any time. The withdrawal of the consent does not affect the legality of the processing carried out based on the declaration of consent until the withdrawal.

#### 3.3 Right to lodge a complaint with a supervisory authority acc. to Art. 77 EU-DSGVO

Every data subject has the right to lodge a complaint with a supervisory authority, if the data subject considers that the processing of personal data relating to him/her infringes to the EU-GDPR.

### 4 Description of other Purposes Legitimate Interests of the Controller acc. to Art. 6 (1) f) EU-GDPR

#### 4.1 Advertising/Marketing

Processing data of the data subject to inform him/her about the above-mentioned event, as well as future and topic-related events.

#### 4.2. providing of our high service standards for our clients

f.e. frequent flyer information / travel preferences / information about changings in flightplans / client feedback ...

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### **5 Privacy Policy for the use of Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer to help the website analyse how visitors 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.

You can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en>.

Please note that this website initializes Google Analytics with the setting "anonymizeIp". This guarantees anonymized data collection by masking the last part of your IP address.

Further information concerning the terms and conditions of use and data privacy can be found at <http://www.google.com/analytics/terms/gb.html> or at [http://www.google.com/intl/en\\_uk/analytics/privacyoverview.html](http://www.google.com/intl/en_uk/analytics/privacyoverview.html)

### **6 Youtube**

Our website contains plugins from the YouTube site run by Google. The operator of the web site is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. When you visit one of our YouTube plugin-enabled sites, you will be connected to the servers of YouTube. The YouTube server will be informed which of our pages you have visited. If you are logged in to your YouTube account, YouTube allows you to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your YouTube account. For more information on how to handle user data, please refer to the YouTube Privacy Policy at <http://www.google.de/intl/en/policies/privacy>