



DATA PROTECTION

Part 1: Data protection information

We take data protection very seriously and inform you herein how we process your data and what claims and rights you are entitled to under data protection regulations. Applicable from 25 May 2018.

Information on data protection regarding our processing under Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR).

1. Office responsible for data processing and contact data:

Akademie Deutscher Genossenschaften e.V.
Schloss Montabaur
56410 Montabaur
E-Mail: info@adgonline.de

Responsible office in the meaning of data-protection law:

HEC Harald Eul Consulting GmbH
Datenschutz + Datensicherheit
Datenschutzbeauftragter der Akademie Deutscher Genossenschaften e.V.
Auf der Höhe 34
50321 Brühl
E-Mail: datenschutz@adgonline.de

2. Purposes and legal foundations upon which we process your data

We process personal data in accordance with the stipulations of the General Data-Protection Regulation (GDPR), the German Federal Data-Protection Act (Bundesdatenschutzgesetz - BDSG) and other applicable data-protection provisions (details are provided in the following). The details of which data are processed and how they are used depends largely on the services requested or agreed in each case. Further details or additions for the purposes of data processing can be found in the respective contract documents, forms, a declaration of consent and/or other information provided to you (e. g. in the context of the use of our website or our terms and conditions). In addition, this data protection information may be updated from time to time, as you may find out from our website www.hotel-schloss-montabaur.de

2.1 Purposes pursuant to fulfilment of an agreement or pre-contractual measures (Art. 6, section 1 b of the GDPR)

The processing of personal data is carried out in order to carry out our contracts with you and the execution of your orders as well as to carry out measures and activities within the framework of pre-contractual relations, e. g. with interested parties. In particular, the processing thus serves to provide according to your orders and wishes and include the necessary services, measures and activities. This essentially includes contract-related communication with you, the verifiability of transactions, orders and other agreements as well as quality control by means of appropriate documentation, goodwill procedures, measures to control and optimize business processes as well as the fulfilment of general duties of care, control and supervision by affiliated companies (e. g. Parent company); statistical evaluations for corporate management, cost recording and controlling, reporting, internal and external communication, emergency management, accounting and tax assessment of operational services, risk management, assertion of legal claims and defence in the event of legal disputes; ensuring IT

security ((inter alia system and plausibility tests) and general security, including building and plant security, securing and exercising domestic authority (e. g. by means of access controls); guaranteeing the integrity, authenticity and availability of data, preventing and investigating criminal offences; control by supervisory bodies or supervisory authorities (e. g. auditing).

2.2 Purposes within the framework of a legitimate interest on our part or of third parties (Art. 6, section 1 f of the GDPR)

Above and beyond the actual fulfilment of the (pre-) agreement, we process your data whenever this is necessary to protect legitimate interests of our own or of third parties, in particular for the following purposes:

- advertising or market and opinion research, as far as you have not objected to the use of your data
- obtaining information and exchanging data with credit agencies where this goes beyond our economic risk
- the examination and optimization of processes for needs analysis
- the further development of services and products as well as existing systems and processes
- the disclosure of personal data within the framework of due diligence in the course of company sale negotiations
- for comparison with European and international anti-terrorist lists, insofar as this goes beyond the legal obligations
- the enrichment of our data, e. g. by using or researching publicly accessible data
- statistical evaluations or market analysis
- of benchmarking
- the assertion of legal claims and defence in legal disputes which are not directly attributable to the contractual relationship
- the restricted processing of data, if a deletion is not possible or only possible with disproportionately high effort due to the special type of storage
- the development of scoring systems or automated decision-making processes
- the prevention and investigation of criminal offences, if not exclusively for the fulfilment of legal requirements
- building and plant security (e.g. by means of access control and video surveillance), insofar as this goes beyond the general duties of care
- internal and external investigations, safety reviews
- any monitoring or recording of telephone conversations for quality control and training purposes
- Preservation and maintenance of certifications of a private-law or official government nature
- the seizure and exercise of domestic authority by means of appropriate measures as well as video surveillance for the protection of our customers and employees as well as for securing evidence in the event of criminal offences and their prevention.

2.3 Purposes within the framework of your consent (Art. 6, section 1 a of the GDPR)

Your personal data can also be processed for certain purposes (e.g. use of company communication systems for private purposes; photographs/videos of you for publication in the Intranet/Internet) including as a result of your consent. As a rule, you can revoke this consent at any time. This also applies to the revoking of declarations of consent that were issued to us before the GDPR went into effect, i.e. prior to 25 May 2018. You shall be separately informed about the consequences of revocation or refusal to provide consent in the respective text of the consent.

Generally speaking, revocation of consent only applies to the future. Processing that takes place prior to consent being issued is not affected by such and remains lawful.

2.4 Purposes relating to adherence to statutory requirements (Art. 6, section 1 c of the GDPR) or in the public interest (Art. 6, section 1 e of the GDPR)

Just like any actor which takes part in business life, we are also subject to a large number of legal obligations. These are primarily statutory requirements (e.g. commercial and tax laws), but also if applicable supervisory law or other requirements set out by government authorities. The purposes of processing may also include identity and age checks, prevention of fraud and money laundering (e.g. comparisons with European and international anti-terror lists), compliance with control and notification obligations under tax law as well as the archiving of data for the purposes of data protection and data security as well as for purposes of audits by tax advisors/auditors, fiscal and other government authorities. In addition, it may be necessary to disclose personal data within the framework of official government/court measures for the purposes of collecting evidence, law enforcement and criminal prosecution or the satisfaction of civil law claims.

3. The categories of data that we process as long as we do not receive data directly from you, and its origin

If necessary for the contractual relationship with you and the activities performed by you, we may process data which we lawfully receive from other offices or other third parties (e.g. quality assessment or complaints by customers/suppliers/consumers). In addition, we process personal data that we have lawfully collected, received or acquired from publicly accessible sources (such as, for example, commercial registers and association registers, civil registers, the press, Internet and other media) if such is necessary and we are allowed to process this data in accordance with statutory provisions.

Relevant personal data categories may in particular be:

- personal data (name, date of birth, place of birth, nationality, marital status, occupation/trade and comparable data)
- contact data (address, e-mail address, telephone number and similar data)
- Address data (population register data and comparable data)
- payment confirmation/confirmation of cover for bank and credit cards
- information about your financial situation (creditworthiness data including scoring, i. e. data for assessing the economic risk)
- customer history
- data about your use of the telemedia offered by us (e.g. time of access to our websites, apps or newsletter, clicked pages/links of us or entries and comparable data)
- Video data

4. Recipients or categories of recipients of your data

At our company, your data is received by those internal offices or organisational units that need such to fulfil our contractual and statutory obligations or that require such data within the framework of processing and implementing our legitimate interests.

Your data is disclosed/passed on to external offices and persons solely

- in connection with the execution of the contract
- for purposes where we are obligated or entitled to give information, notification or forward data (e.g. employer's liability insurance association, health insurance schemes, fiscal authorities) in order to meet statutory requirements or where the forwarding of data is in the public interest (see number 2.4)
- to the extent that external service-provider companies commissioned by us process data as contract processors or parties that assume certain functions (e.g. external data centres, support and maintenance of IT applications, archiving, document processing, call centre services, compliance services, controlling, data screening for anti-money laundering purposes, data validation and data protection. plausibility check, data destruction, purchasing/procurement, customer administration, lettershops, marketing, media technology, research, risk controlling, billing, telephony, website management, auditing services, credit institutions, printing plants or companies for data disposal, courier services, logistics)
- as a result of our legitimate interest or the legitimate interest of the third party within the framework of the purposes cited under number 2.2 (e.g. to government authorities, credit agencies, collection agencies, attorneys, courts of law, appraisers, companies belonging to company groups and bodies and control instances)

- if you have given us consent to transmit data to third parties.

We shall moreover refrain from transmitting your data to third parties if we have not informed you of such separately. If we commission service providers within the framework of processing an order, your data will be subject there to the security standards stipulated by us in order to adequately protect your data. In all other cases, recipients may only use the data for purposes for which the data has been sent to them.

5. Length of time your data is stored

We process and store your data for the duration of our business relationship. This also includes the initiation of a contract (pre-contractual legal relationship) and the execution of a contract.

Above and beyond this, we are subject to various retention and documentation obligations that emanate inter alia from the German Commercial Code (HGB) and the German Tax Code (AO). The periods and deadlines for retention and/or documentation stipulated therein are up to ten years beyond the end of the contractual relationship or the pre-contractual legal relationship.

Furthermore, special statutory provisions may require longer retention such as for example the preservation of evidence in connection with statutory time-barring provisions (statute of limitations). Under §§ 195 ff. of the German Civil Code (BGB), the regular time-barred period is three years, but time-barred periods of up to 30 years may also be applicable.

If the data is no longer required to meet contractual or statutory obligations and rights, it is regularly deleted unless its further processing - for a limited period - is necessary to fulfil the purposes listed under number 2.2 due to an overriding legitimate interest. Such an overriding legitimate interest is deemed to be the case, for example, if it is not possible to delete the data as a result of the special type of storage or such is only possible at an unreasonably great expense and processing for other purposes is excluded by appropriate technical and organisational measures.

6. Processing of your data in a third country or through an international organisation

Data is transmitted to offices in countries outside the European Economic Area EU/EEA (so-called third states) whenever such is necessary to meet a contractual obligation towards you (e.g. if you are despatched to another country), such is required by law (e.g. notification obligations under tax law), such is in the legitimate interest of us or a third party or you have issued us your consent to such.

At the same time, your data may be processed in a third country including in connection with the involvement of service providers within the framework of the processing of the order. If no decision has been issued by the EU Commission regarding the presence of a reasonable level of data protection for the respective country, we warrant that your rights and freedoms will be reasonably protected and guaranteed in accordance with EU data-protection requirements through contractual agreements to this effect. We will provide you with detailed information on request.

You can request information on the suitable or reasonable guarantees and the possibility, how and where to receive a copy of these from the company data-protection officer or the human resources department in charge of you.

7. Your data-protection rights

- If certain conditions are met, you can assert your data-protection rights against us
- Thus, you have the right to receive information from us on the data stored on you in accordance with the rules of Art. 15 of the GDPR (if applicable with restrictions in accordance with § 34 of the German Federal Data-Protection Act (BDSG))
- If you so request, we shall correct data stored on you in accordance with Art. 16 of the GDPR if such data is incorrect or flawed.
- If you so desire, we shall delete your data in accordance with the principles of Art. 17 of the GDPR if such is not prevented by other statutory provisions (e.g. statutory retention obligations or the restrictions laid

down in § 35 of the German Federal Data-Protection Act (BDSG)) or an overriding interest on our part (for example, to defend our rights and claims)

- Taking into account the preconditions laid down in Art. 18 of the GDPR, you can demand that we restrict the processing of your data .
- Furthermore, you can file an objection to the processing of your data in accordance with Art. 21 of the GDPR, as a result of which we have to stop processing your data. This right of objection only applies, however, if very special circumstances characterise your personal situation, whereby the rights of our company may run counter to your right of objection.
- You also have the right to receive your data in accordance with the arrangements laid down in Art. 20 of the GDPR in a structured, commonplace and machine-readable format or transmit such data to a third party.
- You furthermore have the right to revoke consent that has been issued to us to process personal data at any time effective into the future (see number 2.3).
- You are in addition entitled to file a complaint with a data-protection supervisory authority (Art. 77 of the GDPR). We recommend, however, to first always send a complaint to our data-protection officer.

Whenever possible, your applications for the exercise of your rights should be sent in writing to the address stated above or addressed directly to our data-protection officer.

8. Scope of your obligations to provide us your data

You only need to provide data that is necessary for the commencement and performance of the business relationship or for a pre-contractual relationship with us or the collection of which we are required by law. Without this data, we are generally not able to conclude the agreement or continue to perform such. This may also relate to data that is required later within the framework of the contractual relationship. If we request data from you above and beyond this, you shall be informed about the voluntary nature of the information separately.

9. Presence of an automated decision made in individual cases (including profiling)

We do not use any purely automated decision-making procedure as set out in Article 22 of the GDPR. If we do institute such a procedure in individual cases in the future, we shall inform you pursuant here to separately if this is required by law.

Under certain circumstances, we may process your data in part with the aim of evaluating certain personal aspects (profiling).

In order to provide you with targeted information and advice on products, we may use evaluation tools. These enable a needs-oriented product design, communication and advertising including market and opinion research.

Such procedures can also be used to assess your solvency and creditworthiness as well as to combat money laundering and fraud. "Score values" can be used to assess your creditworthiness and creditworthiness. In the case of scoring, the probability is calculated using mathematical methods with which a customer will meet his payment obligations in accordance with the contract. Such score values thus support us, for example, in assessing our creditworthiness, decision-making in the context of product deals and are incorporated into our risk management. The calculation is based on mathematically and statistically recognised and proven methods and is based on your data, in particular income, expenditure, existing liabilities, profession, employer, length of service, experience from the previous business relationship, repayment of previous loans in accordance with the contract and information from credit agencies.

Information on nationality and special categories of personal data according to Art. 9 GDPR are not processed.

Information on your right of objection under Art. 21 of the GDPR

1) You have the right to file an objection at any time against processing of your data which is performed on the basis of Art. 6, section 1 f of the GDPR (data-processing on the basis of a weighing out of interests) or Art. 6, section 1 e of the GDPR (data-processing in the public interest). The precondition for this, however, is that there are grounds for your objection emanating from your special personal situation. This also applies to profiling that is based on this purpose in the meaning of Art. 4, no. 4 of the GDPR.

If you file an objection, we shall no longer process your personal data unless we can demonstrate compelling reasons warranting protection for the processing that outweigh your interests, rights and freedoms, or the processing serves the purpose of asserting, exercising or defending legal claims.

2) We will also use your personal data in order to perform direct advertising. If you do not want to receive any advertising, you have the right to file an objection to such at any time. This also applies to the profiling to the extent that it is connected with such direct advertising. We shall respect this objection with effect into the future.

We shall no longer process your data for the purpose of direct advertising if you object to processing for this purpose.

The objection can be filed without adhering to any form requirements and should if possible be sent to

Akademie Deutscher Genossenschaften e.V.

Schloss Montabaur
56410 Montabaur
E-Mail: info@adgonline.de

Our privacy policy and the information on data protection about our data processing according to article 13, 14 and 21 GDPR may change from time to time. All changes will be published on this page. Older versions can be viewed in an archive

Processing of your data in a third country or through an international organisation.

Part 2: Supplementary data protection information on our website (including Facebook fan pages)

Your visit to this website will be logged, mainly including the IP address, date, time and the pages viewed by you and used by your computer. Normally, a reference to personal data is not possible for us. This data is only collected for data security purposes. The data will not be evaluated otherwise (except for statistical purposes and in an anonymised form).

The data we receive within the scope of an information request will only be used for a correspondence with you.

We will not collect personal data via our websites without your consent. You alone decide on whether or not to provide data for us. We will neither sell your personal data to third parties nor market them otherwise. This website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses so-called "cookies", i.e. text files which can be stored on your computer and allow an analysis of your use of the website. Cookie-generated information on your use of this website will normally be transmitted to a Google server in the USA and will be stored there.

Activating the IP anonymisation on this website abbreviates your IP address from Google within the member states of the European Union or other Contracting States to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the USA and abbreviated there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, compile reports on website activities and provide further services in connection with the use of the website and Internet for the website operator. An IP address transmitted from your browser within the scope of Google Analytics will not be integrated in other Google data.

You may prevent the storage of cookies by a corresponding setting of your browser software. However, we wish to point out that you may no longer use all functions of this website fully in such a case. In addition, you may prevent the data generated by the cookie and related your use of the website (incl. your IP address) to Google as well as the processing of this data by Google by downloading and installing the available browser plugin at [this link](#).

As an alternative to the browser plugin or within browsers on mobile devices, please click the following link to set an opt-out cookie which will prevent a collection by Google Analytics within this website in the future (this opt-out

cookie works only on this browser and only in this domain; if you delete your cookies in this browser, you must click this link again):

Google Analytics (Disable Google Analytics)

We take no responsibility for contents of other websites you can call via our links.

Supplementary data protection information on our Facebook fan pages

Our Facebook fan page (retrievable at: www.facebook.com/meineADG,
www.facebook.com/HotelSchlossMontabaur,

www.facebook.com/KroliamMarkt, www.facebook.com/SchlossArt, www.facebook.com/meineADV) informs you about our services, allowing a contact to or an interaction with us. Our Facebook fan page is provided on the basis on an agreement concluded with Facebook (Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland) on the joint processing of personal data according to Art. 26. DGPR. Page insights controller addendum with respect to the person responsible. According to this article, we cannot make and implement decisions for the processing of insights data. Facebook takes the primary responsibility according to GDPR for the processing of insights data as well as the fulfilment of all obligations from the GDPR with respect to the processing of insights data.

Facebook

We wish to point out that a visit to the Facebook fan page allows the processing of your data as a user outside the EU. The involved Facebook, Inc. has itself committed to be a privacy shield-certified US provider for compliance with EU data protection standards.

<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>
(as of 02.11.2018).

Your data may be processed for market research and advertising purposes by e.g. preparing user profiles on the interests resulting from your user behaviour and by using them for the placement of advertising material. To this effect, cookies are normally stored on your computer.

The "page-insights" feature allows us to access Facebook statistical data from various categories related to the Facebook fan page such as the total number of page views, "Like information", page activities, posting interactions, video views, posting reach, comments, shared contents, responses, portion of men and women, clicks relating to city and country, language, shop visits and clicks, route planner clicks and on phone number clicks. We use this information for making our pages more attractive and more appropriate for your needs (e.g. by finding the right time for publishing a content).

Facebook fan pages are used for processing personal data of the users for safeguarding our legitimate interests in a demand and target-group based design of our information offers as well as the communications with the users (legal basis: Art. 6, para.1. lit. f GDPR). If Facebook, as a provider of the platform, asks you for a consent to certain types of data processing, the data will be processed on the legal basis of Art. 6, para. 1, lit. a GDPR.

As far as the exercise of rights of affected persons as well as information inquiries are concerned, we wish to point out that you claim them best with Facebook (refer to

https://www.facebook.com/legal/terms/information_about_page_insights_data).

Refer to the data protection information of Facebook at <https://www.facebook.com/about/privacy/> as well „information on page insight data“ at

https://www.facebook.com/legal/terms/information_about_page_insights_data for further information on the processing and use of the data as well the pertaining rights and setting possibilities for protecting your privacy.

Opt-Out: <https://www.facebook.com/settings?tab=ads> or <https://www.youronlinechoices.com>

Youtube

Our site uses the provider YouTube LLC , 901 Cherry Avenue, San Bruno, CA 94066, USA, represented by

Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA for the integration of videos. On our website we use Youtube videos to offer you content in a moving image format. Since it is not possible for us to locally host videos on our server, we use the offer of YouTube, a third-party provider. Due to the technology, the integration of YouTube videos may call the YouTube server. To this effect, data from your browser and/or your terminal will be sent to the Youtube server, including information on the Internet site you visited. If you are then logged in as a YouTube member, YouTube will assign this information to your personal user account. You may prevent this assignment by logging out of your YouTube user account as well as other user accounts of the YouTube LLC and Google Inc. companies and by deleting the pertaining cookies of the companies before using our Internet site.

Please refer to the provider's data policy information on the use of data of your browser and/or terminal in connection with playing a video. Further information on the data processing and information on data privacy by YouTube (Google) can be found at www.google.de/intl/de/policies/privacy/.⁹

Vimeo

We use Vimeo videos to offer you content in a moving image format on our site. Since it is not possible for us to host videos the videos locally on our server, we use the offer of Vimeo, a third-party provider. Due to the technology, the integration of YouTube videos may result in calls from the Vimeo server. To this effect, data of your browser and/or your terminal will be sent to the Vimeo server, including information on the Internet site you visited.

Please refer to the provider's data policy information for the use of data of your browser and/or terminal in connection with playing a video. Further information on data processing and information on data privacy by Vimeo can be found at <https://vimeo.com/privacy>.¹⁰

Our data protection declaration as well as the data protection information on our data processing according to Article (Art.) 13, 14 and 21 GDPR may be changed from time to time. We will publish all changes on this site.

Data protection information as of February 2019