

# Privacy Policy

## 1. An overview of data protection

### General

The following gives a simple overview of what happens to your personal information when you visit our website. Personal information is any data with which you could be personally identified. Detailed information on the subject of data protection can be found in our privacy policy found below.

### Data collection on our website

#### Who is responsible for the data collection on this website?

The data collected on this website are processed by the website operator. The operator's contact details can be found in the website's required legal notice.

#### How do we collect your data?

Some data are collected when you provide it to us. This could, for example, be data you enter on a contact form.

Other data are collected automatically by our IT systems when you visit the website. These data are primarily technical data such as the browser and operating system you are using or when you accessed the page. These data are collected automatically as soon as you enter our website.

#### What do we use your data for?

Part of the data is collected to ensure the proper functioning of the website. Other data can be used to analyze how visitors use the site.

#### What rights do you have regarding your data?

You always have the right to request information about your stored data, its origin, its recipients, and the purpose of its collection at no charge. You also have the right to request that it be corrected, blocked, or deleted. You can contact us at any time using the address given in the legal notice if you have further questions about the issue of privacy and data protection. You may also, of course, file a complaint with the competent regulatory authorities.

### Analytics and third-party tools

When visiting our website, statistical analyses may be made of your surfing behavior. This happens primarily using cookies and analytics. The analysis of your surfing

behavior is usually anonymous, i.e. we will not be able to identify you from this data. You can object to this analysis or prevent it by not using certain tools. Detailed information can be found in the following privacy policy.

You can object to this analysis. We will inform you below about how to exercise your options in this regard.

## **2. General information and mandatory information**

### **Data protection**

The operators of this website take the protection of your personal data very seriously. We treat your personal data as confidential and in accordance with the statutory data protection regulations and this privacy policy.

If you use this website, various pieces of personal data will be collected. Personal information is any data with which you could be personally identified. This privacy policy explains what information we collect and what we use it for. It also explains how and for what purpose this happens.

Please note that data transmitted via the internet (e.g. via email communication) may be subject to security breaches. Complete protection of your data from third-party access is not possible.

### **Notice concerning the party responsible for this website**

The party responsible for processing data on this website is:

British Travel Company GmbH  
Hedderichstraße 120  
60596 Frankfurt am Main

Geschäftsführerin: Kerstin Tegtmeyer

Telephone: +49 (0) 69 / 66 37 99 60

Email: [service@btco.de](mailto:service@btco.de)

The responsible party is the natural or legal person who alone or jointly with others decides on the purposes and means of processing personal data (names, email addresses, etc.).

### **Revocation of your consent to the processing of your data**

Many data processing operations are only possible with your express consent. You may revoke your consent at any time with future effect. An informal email making this request is sufficient. The data processed before we receive your request may still be legally processed.

## **Right to file complaints with regulatory authorities**

If there has been a breach of data protection legislation, the person affected may file a complaint with the competent regulatory authorities. The competent regulatory authority for matters related to data protection legislation is the data protection officer of the German state in which our company is headquartered. A list of data protection officers and their contact details can be found at the following link: [https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html).

## **Right to data portability**

You have the right to have data which we process based on your consent or in fulfillment of a contract automatically delivered to yourself or to a third party in a standard, machine-readable format. If you require the direct transfer of data to another responsible party, this will only be done to the extent technically feasible.

## **Information, blocking, deletion**

As permitted by law, you have the right to be provided at any time with information free of charge about any of your personal data that is stored as well as its origin, the recipient and the purpose for which it has been processed. You also have the right to have this data corrected, blocked or deleted. You can contact us at any time using the address given in our legal notice if you have further questions on the topic of personal data.

## **Opposition to promotional emails**

We hereby expressly prohibit the use of contact data published in the context of website legal notice requirements with regard to sending promotional and informational materials not expressly requested. The website operator reserves the right to take specific legal action if unsolicited advertising material, such as email spam, is received.

## **3. Data collection on our website**

### **Cookies**

Some of our web pages use cookies. Cookies do not harm your computer and do not contain any viruses. Cookies help make our website more user-friendly, efficient, and secure. Cookies are small text files that are stored on your computer and saved by your browser.

Most of the cookies we use are so-called "session cookies." They are automatically deleted after your visit. Other cookies remain in your device's memory until you delete them. These cookies make it possible to recognize your browser when you next visit the site.

You can configure your browser to inform you about the use of cookies so that you can decide on a case-by-case basis whether to accept or reject a cookie. Alternatively, your browser can be configured to automatically accept cookies under certain conditions or to always reject them, or to automatically delete cookies when closing your browser. Disabling cookies may limit the functionality of this website.

Cookies which are necessary to allow electronic communications or to provide certain functions you wish to use (such as the shopping cart) are stored pursuant to Art. 6 paragraph 1, letter f of DSGVO. The website operator has a legitimate interest in the storage of cookies to ensure an optimized service provided free of technical errors. If other cookies (such as those used to analyze your surfing behavior) are also stored, they will be treated separately in this privacy policy.

The basis for data processing is Art. 6 (1) (f) DSGVO. The website operator has a legitimate interest to ensure an optimized service provided free of technical errors. Therefore server log files have to be stored.

## **Contact form**

Should you send us questions via the contact form, we will collect the data entered on the form, including the contact details you provide, to answer your question and any follow-up questions. We do not share this information without your permission.

We will, therefore, process any data you enter onto the contact form only with your consent per Art. 6 (1)(a) DSGVO. You may revoke your consent at any time. An informal email making this request is sufficient. The data processed before we receive your request may still be legally processed.

We will retain the data you provide on the contact form until you request its deletion, revoke your consent for its storage, or the purpose for its storage no longer pertains (e.g. after fulfilling your request). Any mandatory statutory provisions, especially

those regarding mandatory data retention periods, remain unaffected by this provision.

## **Registration on this website**

You can register on our website in order to access additional functions offered here. The input data will only be used for the purpose of using the respective site or service for which you have registered. The mandatory information requested during registration must be provided in full. Otherwise, we will reject your registration.

To inform you about important changes such as those within the scope of our site or technical changes, we will use the email address specified during registration.

We will process the data provided during registration only based on your consent per Art. 6 (1)(a) DSGVO. You may revoke your consent at any time with future effect. An informal email making this request is sufficient. The data processed before we receive your request may still be legally processed.

We will continue to store the data collected during registration for as long as you remain registered on our website. Statutory retention periods remain unaffected.

## **Leaving comments on this website**

If you use the comment function on this site, the time at which you created the comment and your email address will be stored along with your comment, as well as your username, unless you are posting anonymously.

### **Storage of the IP address**

Our comment function stores the IP addresses of those users who post comments. Since we do not check comments on our site before they go live, we need this information to be able to pursue action for illegal or slanderous content.

### **How long comments are stored**

The comments and the associated data (e.g. IP address) are stored and remain on our website until the content commented upon has been completely deleted or the comments are required to be removed for legal reasons (slander, etc.).

### **Legal basis**

The comments are stored based on your consent per Art. 6 (1) (a) DSGVO. You may revoke your consent at any time with future effect. An informal email making this

request is sufficient. The data processed before we receive your request may still be legally processed.

## **Processing of data (customer and contract data)**

We collect, process, and use personal data only insofar as it is necessary to establish, or modify legal relationships with us (master data). This is done based on Art. 6 (1) (b) DSGVO, which allows the processing of data to fulfill a contract or for measures preliminary to a contract. We collect, process and use your personal data when accessing our website (usage data) only to the extent required to enable you to access our service or to bill you for the same.

Collected customer data shall be deleted after completion of the order or termination of the business relationship. Legal retention periods remain unaffected.

## **Data transmitted when entering into a contract with online shops, retailers, and mail order**

We transmit personally identifiable data to third parties only to the extent required to fulfill the terms of your contract, for example, to companies entrusted to deliver goods to your location or banks entrusted to process your payments. Your data will not be transmitted for any other purpose unless you have given your express permission to do so. Your data will not be disclosed to third parties for advertising purposes without your express consent.

The basis for data processing is Art. 6 (1) (b) DSGVO, which allows the processing of data to fulfill a contract or for measures preliminary to a contract.

## **Data transferred when signing up for services and digital content**

We transmit personally identifiable data to third parties only to the extent required to fulfill the terms of your contract with us, for example, to banks entrusted to process your payments.

Your data will not be transmitted for any other purpose unless you have given your express permission to do so. Your data will not be disclosed to third parties for advertising purposes without your express consent.

The basis for data processing is Art. 6 (1) (b) DSGVO, which allows the processing of data to fulfill a contract or for measures preliminary to a contract.

## 4. Analytics and advertising

### Google Analytics

This website uses Google Analytics, a web analytics service. It is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google Analytics uses so-called "cookies". These are text files that are stored on your computer and that allow an analysis of the use of the website by you. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there.

Google Analytics cookies are stored based on Art. 6 (1) (f) DSGVO. The website operator has a legitimate interest in analyzing user behavior to optimize both its website and its advertising.

#### IP anonymization

We have activated the IP anonymization feature on this website. Your IP address will be shortened by Google within the European Union or other parties to the Agreement on the European Economic Area prior to transmission to the United States. Only in exceptional cases is the full IP address sent to a Google server in the US and shortened there. Google will use this information on behalf of the operator of this website to evaluate your use of the website, to compile reports on website activity, and to provide other services regarding website activity and Internet usage for the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with any other data held by Google.

#### Browser plugin

You can prevent these cookies being stored by selecting the appropriate settings in your browser. However, we wish to point out that doing so may mean you will not be able to enjoy the full functionality of this website. You can also prevent the data generated by cookies about your use of the website (incl. your IP address) from being passed to Google, and the processing of these data by Google, by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

#### Objecting to the collection of data

You can prevent the collection of your data by Google Analytics by clicking on the following link. An opt-out cookie will be set to prevent your data from being collected on future visits to this site: [Disable Google Analytics](#).

For more information about how Google Analytics handles user data, see Google's privacy policy: <https://support.google.com/analytics/answer/6004245?hl=en>.

### **Outsourced data processing**

We have entered into an agreement with Google for the outsourcing of our data processing and fully implement the strict requirements of the German data protection authorities when using Google Analytics.

### **Demographic data collection by Google Analytics**

This website uses Google Analytics' demographic features. This allows reports to be generated containing statements about the age, gender, and interests of site visitors. This data comes from interest-based advertising from Google and third-party visitor data. This collected data cannot be attributed to any specific individual person. You can disable this feature at any time by adjusting the ads settings in your Google account or you can forbid the collection of your data by Google Analytics as described in the section "Refusal of data collection".

## **5. Newsletter**

### **Newsletter data**

If you would like to receive our newsletter, we require a valid email address as well as information that allows us to verify that you are the owner of the specified email address and that you agree to receive this newsletter. No additional data is collected or is only collected on a voluntary basis. We only use this data to send the requested information and do not pass it on to third parties.

We will, therefore, process any data you enter onto the contact form only with your consent per Art. 6 (1) (a) DSGVO. You can revoke consent to the storage of your data and email address as well as their use for sending the newsletter at any time, e.g. through the "unsubscribe" link in the newsletter. The data processed before we receive your request may still be legally processed.

The data provided when registering for the newsletter will be used to distribute the newsletter until you cancel your subscription when said data will be deleted. Data we have stored for other purposes (e.g. email addresses for the members area) remain unaffected.

### **Newsletter2Go**

This website uses Newsletter2Go to send newsletters. The provider of this service is Newsletter2Go GmbH, Nürnberger Straße 8, 10787 Berlin, Germany.

Newsletter2Go is a service which organizes and analyzes the distribution of newsletters. The data you provide to subscribe to our newsletter will be stored on Newsletter2Go servers in Germany.

If you do not want your usage of the newsletter to be analyzed by Newsletter2Go, you will have to unsubscribe from the newsletter. For this purpose, we provide a link in every newsletter we send. You can also unsubscribe from the newsletter directly on the website.

### **Data analysis by Newsletter2Go**

We use Newsletter2Go to analyze our newsletter campaigns. This allows us to determine if a newsletter message has been opened and which links you click on. We can thus find out how often various links are clicked.

In addition, we can see if certain actions take place after clicking on said links (conversion rate). We can thus determine whether the clicking of a link in a newsletter has led to a purchase, for example.

Newsletter2Go also allows us to classify newsletter recipients into different categories (clustering). For example, newsletter recipients can be subdivided according to gender, personal preference (e.g. vegetarian or non-vegetarian), or customer relationship (e.g. existing or potential customer). This allows us to adapt the newsletters to the respective target groups.

For detailed information on the functions of Newsletter2Go, see the following link: <https://www.newsletter2go.de/features/newsletter-software/>.

### **Legal basis**

Data processing is based on Art. 6 (1) (a) DSGVO. You may revoke your consent at any time. The data processed before we receive your request may still be legally processed.

### **Storage duration**

The data provided when registering for the newsletter will be used to distribute the newsletter until you cancel your subscription when said data will be deleted from our servers and those of Newsletter2Go. Data we have stored for other purposes (e.g. email addresses for the members area) remains unaffected.

For more information, see the privacy policy of Newsletter2Go at <https://www.newsletter2go.de/features/datenschutz-2/>.

### **Completion of an outsourced data processing contract**

We have entered into a data processing agreement with Newsletter2Go, in which we require Newsletter2Go to protect the data of our customers and not to disclose said data to third parties. It can be downloaded here: [https://www.newsletter2go.de/docs/datenschutz/ADV\\_Muster\\_Newsletter2Go\\_GmbH\\_latest\\_Form.pdf?x48278](https://www.newsletter2go.de/docs/datenschutz/ADV_Muster_Newsletter2Go_GmbH_latest_Form.pdf?x48278).

## 6. Plugins and tools

### YouTube

Our website uses plugins from YouTube, which is operated by Google. The operator of the pages is YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

If you visit one of our pages featuring a YouTube plugin, a connection to the YouTube servers is established. Here the YouTube server is informed about which of our pages you have visited.

If you're 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.

YouTube is used to help make our website appealing. This constitutes a justified interest pursuant to Art. 6 (1) (f) DSGVO.

Further information about handling user data, can be found in the data protection declaration of YouTube under <https://www.google.de/intl/de/policies/privacy>.

### Google Maps

This site uses the Google Maps map service via an API. It is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

To use Google Maps, it is necessary to save your IP address. This information is generally transmitted to a Google server in the USA and stored there. The provider of this site has no influence on this data transfer.

The use of Google Maps is in the interest of making our website appealing and to facilitate the location of places specified by us on the website. This constitutes a justified interest pursuant to Art. 6 (1) (f) DSGVO.

Further information about handling user data, can be found in the data protection declaration of Google at <https://www.google.de/intl/de/policies/privacy/>.