

PRIVACY NOTICE

Scope of this Privacy Notice

The controller is Wolters Reisen GmbH (referred to in this Privacy Notice as “we” or “us”).

We are committed to doing the right thing when it comes to how we collect, use and protect your personal data. Your privacy is important to us, so please take the time to read our Privacy Policy. This explains:

- What types of personal data we collect and why we collect it.
- When and how we may share personal data with other organisations.
- Your options for how you can access and update your personal data.

We have made every effort to make this Policy as simple as possible, but if you are not familiar with terms such as controller or specific categories of personal data, you can find out more in the Keywords section.

Personal data that we collect

If you register for our services, you may pass on to us:

- Your personal details, such as your address, email address, telephone number and date of birth,
- Your account login information, such as your username and the password you have chosen.

If you browse our websites or use our mobile apps, we may collect:

- Travel preferences,
- Information about your browsing behaviour on our websites and mobile apps,
- Information about when you click on any of our advertisements, including those shown on websites of other organisations,
- Information about the way you access our digital services, including your operating system, IP address, online identifiers and browser details,
- Social preferences, interests and activities.

If you book our products online, we may collect:

- Information about the traveller, passport details, other identification information,
- Insurance data,
- Relevant medical data as well as any special dietary requirements or other requirements for religious reasons and reasons of physical impairment,
- Information about your bookings, such as what you booked, when and where you booked it, how you paid, and credit card or other payment information,
- Information about your browsing behaviour on our websites and mobile apps,
- Information about when you click on any of our advertisements, including those shown on websites of other organisations,
- Information about the way you access our digital services, including your operating system, IP address, online identifiers and browser details,
- Social preferences, interests and activities.

If you contact us or we contact you or if you participate in promotions, competitions or surveys about our services, we may collect:

- Personal information that you provide when you contact us, including by email, post and telephone or via social media, such as your name, username and your contact details,
- Details about emails and other digital communications that we send to you and that you open, including any links contained therein that you click,

- Your feedback and contributions to customer surveys.

Other sources of personal data

- We may use personal data from other sources, such as from companies that provide information and data, trading partners and public registers.
- When you log in to interact with our platforms and online services using your social network login details, such as Facebook, Google+ or Twitter, you agree to share your user data with us. For example, this includes your name, email address, date of birth, location and other information that you would like to share with us.
- We may use recordings from surveillance cameras, IP addresses, and browser data collected in or near our shops, business premises, other buildings and cruise ships.

Personal data about other persons that you submit to us

- We use personal data that you provide about others, such as further information on your booking.

By providing personal data about other people, you must be sure that they agree to this and that you are permitted to submit the information. If necessary, you should also ensure that these people know how their personal data could be used by us.

Use of your personal data

We use your personal data in a variety of ways, as explained below.

To provide products and services that you request

We need to process your personal data so that we can manage your account or booking, provide you with the products and services you require and assist you with orders and any refunds you may demand.

Data from traffic partners, travel agencies and landlords is used and processed in the context of processes connected to the business relationship.

To manage and improve our products, services and day-to-day operations

We use personal data to manage and improve our products, websites, mobile apps, loyalty and customer recognition programmes and other services.

We monitor how our services are used to protect your personal data and to detect and prevent fraud, other crimes and the misuse of services. This helps us ensure that you can use our services safely.

We may use personal data to respond to and manage security incidents, disruptions or other similar occurrences. These could be of a medical or insurance-related nature, for instance.

We may use personal data to conduct market research and internal development and to develop and improve our product range, services, shops and IT systems, security, expertise and our methods of communication with you.

We use recordings from surveillance cameras to maintain the safety of anyone working in or visiting our business premises, as well as to detect, prevent and prosecute offences. We may also rely on the images to exercise and defend our legal rights.

To personalise your experience

We want to ensure that marketing communications (including online advertising) related to our products and services as well as those of our suppliers, and trading partners and are tailored to your interests.

To do this, we use your personal data to better understand your interests, so we can try to predict what other products, services and information might interest you most. This allows us to tailor our communication to make it more relevant and interesting to you.

Observing your browsing habits and purchases helps us to understand you as a customer and allows us to offer you personalised offers and services.

We may also take into account your feedback on our marketing actions regarding our range of products and services. This allows us to offer you products and services that better meet your needs as a customer.

If you do not wish to receive a personalised service from us, you may change your preferences with us at any time online, by telephone or in writing (for example, by email). We will update your data as soon as possible.

To contact and interact with you

We want to serve you better as a customer. So if you contact us, for example, by email, post, telephone or social media, we may use personal data to address your concerns as quickly and effectively as possible.

We need to process your personal data in order to manage promotions and competitions that you choose to participate in. This includes those that we organise together with our suppliers and trading partners, for example if you win a prize.

We would like to invite you to participate in customer surveys and other market research activities carried out for your benefit by us and other organisations.

To help us better understand you as a customer and be able to provide you with services and marketing communications (including online advertising tailored to your interests), we may combine the personal data we collect when you make purchases in a shop with personal data collected through our websites, mobile apps and other sources.

We will **not** sell your personal data to third parties.

Marketing activities

We would like to provide you with relevant offers and news about our products and services in various ways, such as by email. We would also like to send you information about other companies' products and services that we believe may be of interest to you. We will only do so if you have previously agreed to receive this marketing communication.

When you book or register with us, we will ask you if you would like to receive marketing communications. You can change your marketing preferences at any time, whether online, by phone, via a link to unsubscribe from newsletters in our marketing emails or by writing to us (for example, by email).

You would, however, still receive service-related communications from us. For example, confirmations of bookings you make with us and important information about the use of our products and services.

Market research

Your opinion is important to us in order to improve our products and services, so we may contact you for market research purposes. You always have the choice as to whether to participate in our market research.

Sharing personal data with suppliers and trading partners

In order to provide you with the products and services you require, we need to share personal data with providers of your travel packages, including airlines, hotels, holiday home landlords and transportation companies.

We also work with carefully selected providers who perform specific functions for you. For example, this includes companies that help us with IT services, data storage and linking, marketing, market research, payment processing and the provision of products and services.

We may need to share personal data in order to safeguard or defend our legal rights; this includes transferring personal data to third parties, for example to prevent fraud and reduce credit risk.

When we share personal data with other organisations, we ask them to keep the data secure, and they are not permitted to use your personal data for their own marketing purposes.

We only share the minimum amount of personal data to enable our suppliers and trading partners to provide their services to you and us.

Sharing personal data with the authorities

In order for you to be able to travel, it is sometimes compulsory (legally required by the authorities in the departure and/or destination country) to disclose and process your personal data for purposes of immigration, border control, security and counter-terrorism, or other purposes identified by these as appropriate.

Some countries only issue a travel authorisation if you provide your enhanced passenger data (such as Caricom API data and US Secure Flight data). These requirements may vary depending on your destination and we recommend that you check this on a case-by-case basis. Even if this is not compulsory, we will be happy to assist you.

We may share the minimum amount of personal data necessary with other authorities if the law requires us to do so or if we are legally permitted to do so.

Protection of your personal data

We know how important it is to protect and appropriately manage your personal data. We take appropriate security measures to help protect your personal data from accidental loss and unauthorised access, use, modification and disclosure.

However, the security of your data is also your responsibility. For example, if we have given you a password to access certain services or you have chosen one, you are responsible for keeping this password secret.

The personal data we collect from you may also be transferred to a destination outside the European Economic Area (EEA) and stored there. It may also be processed by companies operating outside the EEA which work for us or one of our suppliers. We take appropriate precautions to ensure that your personal data is appropriately protected and that it is handled in accordance with this Privacy Notice. These precautions include corresponding contractual clauses, such as [standard contractual clauses approved by the European Commission](#), as well as appropriate security measures.

Data retention

We store your personal data only for as long as it is necessary for the purposes set out in this Privacy Notice and/or to comply with statutory retention requirements. After this period, we will delete personal data in a secure manner. If data is required after this period for analytical, historical or other legitimate business purposes, we will take appropriate measures to anonymise that data.

About cookies and similar technologies

Cookies are small data files that allow a website to collect and store a range of data on your desktop, laptop or mobile device. Cookies help us provide important features and functions on our websites and mobile apps, and we use them to improve your customer experience. Please also see our separate Cookie Notice.

Links to other websites

Our websites or mobile apps may contain links to websites of other organisations that have their own privacy notices. Please be sure to carefully read the terms of service and the privacy notice before providing any personal data on a website of another organisation, as we assume no responsibility or liability for the websites of other organisations.

Features of social media

Our websites or mobile apps may contain social media features such as Facebook, Twitter, Google+ or Pinterest that have their own privacy notices.

Please be sure to carefully read the terms of service and the privacy notice before transferring any personal data, as we assume no responsibility or liability for these features.

Accessing and updating your personal data; complaints

You have the right to request a copy of the personal data we hold about you. You may write to us requesting a copy of any other personal data stored about you.

Please include any details that will help us to identify and locate your personal data. If we can provide access to the data, we will do so for free, unless further copies are requested. In this case, we may charge an appropriate fee based on administrative costs.

We want to make sure that the personal data we store about you is accurate and up to date. If any of the information we hold about you is incorrect, please let us know.

You can also request that your personal data is corrected or deleted, object to the processing of your personal data and, if technically feasible, request that personal data that you have submitted to us be passed on to another organisation.

We will update or delete your data unless we need to keep it for legitimate business or legal purposes.

You can also contact us if you would like to complain about how we collect, store and use your personal data. It is our goal to provide the best possible solution to your complaints. However, if you are not satisfied with our response, you can also contact the local data protection authority, www.lfd.niedersachsen.de.

Please submit your request or complaint in writing to the legal department or the data protection officer.

Address: Wolters Reisen GmbH, Parsevalstraße 7a, 40468 Düsseldorf / Germany

Email: datenschutz@tuivillas.com

Please note that we may ask you to confirm your identity before we process your request or complaint. We may also ask you for more information to help us ensure that you are authorised to make this request or complaint to us, for example if you contact us on behalf of someone else.

Legal basis for processing personal data

We only collect and use your personal data if at least one of the following conditions is met:

- We have your consent;

Example: Landlord's account

You give us permission to process your personal data when you register for a landlord's account as a landlord of a holiday home.

- It is necessary to take appropriate steps in order to contact you, or at your request, before concluding a contract;

Example: Provision of the products and services you requested

We need to process your personal data so that we are able to manage your customer account or booking, provide you with the products and services you want to purchase, and assist you with orders or any refunds.

- It is necessary in order to comply with a legal obligation;

Example: Sharing personal data with the authorities

In order for you to be able to travel, it may be compulsory (legally required by the authorities in the departure and/or destination country) to disclose and process your personal data for purposes of immigration, border control, security and counter-terrorism, or other purposes identified by the authorities as appropriate.

- It is necessary in order to protect your vital interests or those of other persons;

Example: Security measures

We may use personal data to take security measures or respond to disruptions or other similar incidents, including those of a medical and insurance-related nature.

- It is in our or a third party's legitimate interests, unless this is overridden by your own interests or rights.

Example: To personalise your travel experience

We may use your personal data to better understand your interests so that we can try to predict what other products, services and information you might be most interested in. This allows us to tailor our communications to make them more relevant and interesting to you.

If we need to process special categories of personal data, such as health data, for medical reasons, we will do so only if one or more additional conditions is met: we have your explicit consent; it is necessary to protect your vital interests or those of another person and you are physically or legally unable to give consent; it is necessary to substantiate, assert or defend legal claims; it is necessary for reasons of substantial public interest.

Safety on the web

Attempted fraud on the Internet is becoming more and more common, and at the same time, fraudsters' behaviour is becoming more and more professional. We would therefore like to inform you about the possible risks. Please note the following advice:

Beware of phishing:

It is not always clear at first glance whether an email or a website is genuine. Forgeries often look deceptively real. An initial indication is the domain. Endings such as ...tuix instead of ...tui or ...adraveo instead of ...atraveo should set off warning bells. Fake messages also often contain concrete demands for payment. If you have received an email that you believe is not from us, do not reply to it and do not click on any links or attachments. Report the incident to us by sending the email in question to customerservice@tuivillas.com. To do this, please create a new email and attach the suspicious message as an attachment. This gives us better ways of tracking the origin of the mail.

Beware of fake offers on the Internet:

Fake offers or sales platforms are also not easy to recognise. Some are copies of real online shops which look just as legitimate – including fake terms and conditions and legal notices. Be critical of websites with unusually good offers. If you have any doubts about the authenticity of a website or offer, please feel free to contact our customer service team at customerservice@tuivillas.com or +49 (0)211 66 88 78-830.

An indication of untrustworthy offers is if only bank transfer is accepted as a payment method. The fraudsters are often based abroad, and the offer usually does not exist at all. It helps to use search engines or forums to find out about the particular shop before booking online. Consumer advice centres will also be able to inform you about the latest fraud cases. If you are unsure whether an offer might be fake, please contact our customer service team at customerservice@tuivillas.com or +49 (0)211 66 88 78-830.

We will never ask you to transfer a deposit or the full travel cost to a foreign account. Avoid payment services like Western Union, paysafe or Ukash.

Protect your data:

Never enter your login details on unknown or supposedly well-known websites, even if you are specifically requested to do so. Look closely at the domain and be careful with combinations such as ...tuix.de instead of ...tui.de or ...adraveo.com instead of ...atraveo.com. Secure sites can be recognised by the lock symbol and the abbreviation "https" in the address bar of your browser. atraveo will never ask you to enter your data on an unencrypted website ("http" instead of "https").

For more information on safety on the web, please refer to the website of the [German Federal Office for Information Security](#).

Changes to this Privacy Notice

This Privacy Notice replaces all previous versions. We may change the Notice at any time, so please check it regularly on our website(s) for any updates. If the changes are significant, we will provide a clearly identifiable message on our website(s). In addition, we will send you an electronic notification of changes to our Privacy Notices if we deem it appropriate.

Last updated: **June 2021**

Keywords

Controller: The controller determines the purposes and means of the use of personal data.

European Economic Area (EEA): EU member states plus Norway, Iceland and Liechtenstein.

Online advertising: Marketing messages that you can see on the Internet.

Special categories of personal data: These are categories of personal data that reveal racial and ethnic origin, political opinions, religious or philosophical beliefs or trade union membership; genetic data, biometric data for the purpose of

unambiguous identification of a natural person; health data as well as data on a natural person's sexuality or sexual orientation.

Caricom API data: Some or all Caricom countries have entered into an agreement with the United States whereby enhanced passenger data which is required by and provided to Caricom countries for border security purposes is passed on to the US Department of Homeland Security for processing on behalf of these Caricom countries. For more information, please visit the [Caricom website](#).

US Secure Flight data: The Transportation Security Administration (TSA) requires you to provide your full name, date of birth and sex for the purpose of processing passenger lists. You can also specify your redress number if available. If this information is not provided, you may be denied transportation or the right to enter the boarding area. The TSA may share the information you provide with law enforcement or intelligence agencies or with others in accordance with its published system of records notice. For more information, please visit the [TSA website](#).

COOKIE NOTICE

About cookies and similar technologies

Cookies are small data files that allow a website to collect and store a range of data on your desktop, laptop or mobile device. Cookies help us provide important features and functions on our websites and mobile apps, and we use them to improve your customer experience. With our permission, cookies from other companies may be applied on our websites and mobile apps. For example, we use cookies to do the following:

Improve the functionality of our websites and mobile apps

Cookies allow us to evaluate and improve the way our websites and mobile apps work so that we can personalise your experience and allow you to enjoy many of the useful features. For example, cookies help us keep track of what you book as you go through each stage of the booking process; they help us remember your preferences such as last searches or listed holidays and the contents of your online shopping basket.

Improve the performance of our websites and mobile apps

Cookies can help us understand how our websites and mobile apps are used, for example, by telling us whether you get any error messages when using the site, so that we can then test various features of our website and mobile apps. Website analytics, including Google Analytics and AT Internet, provide information about the number of visitors to our website and mobile apps, which areas of our website and mobile apps are particularly popular and whether there are any trends such as if a particular page is viewed mainly by people in a particular country. These cookies ultimately help us to improve your visit to our website.

Provide relevant online advertising

We use cookies to provide online advertising that we believe will be of particular interest to you when visiting our websites, mobile apps and other websites. For example, these cookies help us to suggest flights from your nearest airport, a holiday to a destination you are interested in, or products that you may like.

These cookies may collect data about your online behaviour, such as your IP address, the website from which you came to ours, as well as information about your order history or the contents of your shopping basket.

This means that you may see our advertising on our websites, mobile apps and websites of other companies. You may also see advertising for other companies on our websites and mobile apps.

To help us provide only relevant online advertising, we also link data that we collect through cookies in your device's browser to other data we collect.

Measure the effectiveness of our marketing communications, including online advertising

Cookies tell us if you have seen a specific advertisement and how long ago that was. This information allows us to measure the effectiveness of our online advertising campaigns and check how many times an advertisement has been shown to you. This prevents us from constantly showing you the same advertisement. We also use cookies to measure the effectiveness of

our marketing communications, allowing us to find out whether you have opened a marketing email we sent you, for instance.

Your choices regarding cookies

You can use your browser settings to accept or reject new cookies and delete existing ones. You can also set your browser to notify you each time new cookies are stored on your computer or another device. More detailed information on how to manage cookies can be found on the websites [All About Cookies](#) and [Your Online Choices](#).

If you choose to disable some or all cookies, you may not be able to make full use of our websites or mobile apps. For example, you may not be able to add items to your shopping basket, proceed to checkout or use any of our products and services that otherwise require a login.

If we display personalised advertisements on other companies' websites, the AdChoices icon is normally displayed. Clicking on this icon will provide you with a special guide on how to control your online advertising settings. More information is available on the [YourAdChoices](#) website.

Google Re/Marketing Services

Based on our legitimate interests (i.e. interest in the analysis, optimization and economic operation of our online offers within the meaning of Art. 6 Para. 1 Letter f of the GDPR), we use the marketing and remarketing services (in short: "Google marketing services") of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google").

Google marketing services allow us to show ads for and on our website more selectively in order to present users only those ads that potentially interest them. If, for example, a user is shown ads for products that interested him in other websites, then this is called "remarketing". For these purposes, when our website and others on which Google marketing services is active are visited, Google directly executes a Google code into the website and so-called (re)marketing tags (invisible graphics or code, also known as "web beacons") are integrated into the website. With their help, an individual cookie (i.e. a small text file) is stored on the users' device (instead of cookies, similar technologies can also be used). The cookies can be set by different domains such as google.com, doubleclick.net, invitemediam.com, admeld.com, googlesyndication.com or googleadservices.com. This file indicates which websites the user has visited, what contents have interested him and what offers he has clicked on, in addition to providing technical information about the browser and operating system, referring websites, visiting time and other details about the use of the online offers. The IP address of the users is also recorded, although we inform you that as part of Google Analytics, the IP address within the member states of the European Union or in other contracting states to the Agreement on the European Economic Area is shortened and transferred fully to a Google server in the USA only in exceptional cases to be shortened there. The IP address is not combined with the user's data within other Google offers. Google can combine the information mentioned above with such information from other sources as well. When the user visits other websites later, ads that match his interests can be shown to him.

Users' data are processed under a pseudonym within the framework of Google marketing services, i.e. Google stores and processes, for example, not the name or e-mail address of users but processes the user profiles relevant to the data cookie within pseudonymous user profiles. In other words, in Google's view, the ads are not administered and shown for a specifically identified person, but for the cookie owner, regardless of his identity. This does not apply when a user has expressly allowed Google to process the data without this pseudonymization. The information that Google marketing services collects through users is transmitted to Google and stored on Google servers in the USA.

The Google marketing services that we use include the online advertising program "Google AdWords" in which every AdWords customer receives a different "conversion cookie". So cookies cannot be tracked through the websites of AdWords customers. The information obtained with the help of the cookies serve to compile conversion statistics for AdWords customers who have opted for conversion tracking. AdWords customers find out the total number of users that have clicked on their ad and were forwarded to a page with a conversion tracking tag, but do not receive information that allows the personal identification of users.

Based on "DoubleClick" of Google marketing services, we can integrate third-party ads. DoubleClick uses cookies that allow Google and its partner websites to place ads based on the visits of users to this website or other internet websites.

Based on "AdSense" of Google marketing services we can integrate third party ads. AdSense uses cookies that allow Google and its partner websites to place ads based on the visits of users to this website or other internet websites.

We can also use the "Google Optimize" service, which allows us, as part of so-called "A/B testing", to understand how various changes impact a website (e.g. changes of the input fields, the design, etc.). Cookies are stored on the users' devices for these testing purposes, but only pseudonymous user data are processed.

Furthermore, we can use the "Google Tag Manager" to integrate and administer the Google analysis and marketing services in our website. For more information on data usage for marketing purposes by Google, visit the overview page:

<https://policies.google.com/technologies/ads?hl=en>; Google's Data Privacy Statement is found in

<https://policies.google.com/privacy?hl=en>.

If you would like to object to the interest-related advertising by Google marketing services, you can utilize Google's available setting and opt-out options: <https://adssettings.google.com/authenticated?hl=en>

Changes to our Cookie Notice

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Last updated: **June 2021**

Keywords

Website analytics: Website analytics, such as Google Analytics, Google Optimize and AT Internet, help us understand how visitors use our website. We can see a range of reports on how visitors interact with our website and mobile apps. This helps us constantly improve the website experience for visitors' benefit.

Website analytics use so-called first-party cookies to track visitor interactions. In our case, they are used to gather information about how visitors use our website and mobile apps. We then use the information to generate reports that help us improve our website.

This website uses Google Analytics, a web analysis service provided by Google LLC ("Google"). Google Analytics uses so-called cookies, text files that are stored on your computer and that allow analysis of your use of the website. The information generated by the cookie about your use of this website (including your IP address) is transferred to one of Google's servers in the USA, where it is stored. Google will use this information to evaluate your use of the website, to compile reports on website activity for the website operators and to provide other services related to website and internet usage. Google may also transfer this information to third parties if required by law or insofar as third parties process this data on behalf of Google. Google will never associate your IP address with other Google data. You can prevent the installation of cookies by setting your browser software accordingly; however, please be aware 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 described above.

You can object to data collection and storage at any time with future effect. To do this, you can use the following [plugin](#).

Our website uses Google Analytics' anonymisation feature. As a result, IP addresses are only stored and processed in a shortened version so that they cannot be linked to individuals.

The Google Analytics code implemented on this website supports display advertising. Remarketing is activated on this website as part of Google Analytics' code for display advertising. Our advertisements are shown on third-party websites, including Google. We and third parties, including Google, use cookies to do this. The combined use of first-party cookies (such as Google Analytics cookies) and third-party cookies (such as DoubleClick cookies) allows targeted advertising, advert optimisation and advert placement based on your previous visits to this website. You can use the [preset manager to disable Google Analytics](#) for display advertising and to customise advertisements in the Google Display Network. In addition, this website uses Google's Demographics and Interest Reports feature.

If you want to disable the Google Analytics advertising features, you can do so as follows: Follow this link to [Google's advertising privacy policies](#). Alternatively, you can go to the deactivation page of the [Network Advertising Initiative](#) and change the appropriate settings there.

We use a solution from AT Internet to analyse and evaluate the use of our websites. The aim is to design our websites so that they are optimally adapted to your needs. We want to improve the user-friendliness and quality of our websites and present you with interesting products and information in a timely and customer-friendly way.

To do this, it is necessary to statistically record and analyse user behaviour on our websites. The analysis tool is technically designed so that it is not possible for us to draw any conclusions about you as a person or create a personal user profile based on the information available to us.

AT Internet relies among other things on cookies. Cookies are stored on your computer in the form of text files. They make it possible to recognise you in the event of a repeat visit. You can configure the settings of your browser at any time so that cookies are rejected or deleted directly. Please refer to the instructions from your browser manufacturer. Please be aware that this could mean that you can no longer fully use the features of our websites.

During the collection and processing, AT Internet also uses the IP address of our online users. To protect this data, it is stored in an anonymous form for a limited period of time (6 months), so that all statistical analysis is carried out without any reference to you. AT Internet does not publish any personal statistical data.

We evaluate the data for the following purposes in particular:

- To conduct performance or profitability comparisons of our websites,
- To count visitors,
- To track the attention paid to online advertising, partner and affiliate programmes, rich media content and special campaigns on the website,
- To measure the areas of the website that are particularly appealing to you,
- To assess the origin of online users in order to locally optimise our offer.

Online advertising: Marketing messages that you can see on the Internet.

Last updated: **June 2021**