

DATA PROCESSING INFORMATION

We take the responsible handling of our guests' personal data very seriously. Protecting your personal data is important to us. A-ROSA Flussschiff GmbH and A-ROSA Reederei GmbH are both responsible for data processing.

According to Articles 13 and 14 of the EU General Data Protection Regulation (GDPR), there are information obligations when collecting personal data. For this reason, we are providing you with the following information:

NAME AND CONTACT DETAILS OF THE CONTROLLER

A-ROSA Flussschiff GmbH, Loggerweg 5 18055 Rostock, Germany service@a-rosa.com Telephone 0049381 440 40 100 Managing Director: Rolf-Dieter Maltzahn	A-ROSA Reederei GmbH, Kasernenstrasse 92 7000 Chur, Schweiz office.fluss@a-rosa.com Telephone 0041 812543840 Managing Director: Markus Zoepke
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DATA PROTECTION OFFICER

Data protection officer: Gunar Laaser
Email: datenschutzbeauftragter@a-rosa.com

PURPOSE OF PROCESSING

As tour operators, A-ROSA Flussschiff GmbH and A-ROSA Reederei GmbH collect, process and use your personal data for managing prospective and existing customers, and for providing customer services, in accordance with statutory provisions. This data is collected and processed solely for the purpose of fulfilling travel bookings and travel contracts and providing the associated services. This includes, among other things, information for the ship's manifest, surveys and evaluations of travel services. A-ROSA Reederei GmbH is responsible for the operational management of your trip. It processes the collected data to provide contractual services.

Data is collected, processed and used within the scope of business operations for the purposes described above. If required by law, your data will be stored as evidence in accordance with the requirements of the tax authorities.

The following overview shows the responsibilities for data processing:

Processing stage	Responsibility
Collection of data subjects' personal data, systematisation (organisation, structuring, matching, linking), provision (retrieval, use, transfer, dissemination), processing (adjustment, alteration, restriction, erasure, destruction)	A-ROSA Flussschiff GmbH and A-ROSA Reederei GmbH
Storage of the data (in the CRM system)	A-ROSA Flussschiff GmbH

LEGAL BASIS FOR PROCESSING

Data processing is carried out on the basis of your enquiry or interest, and is necessary for the stated purposes in order to process your travel booking appropriately. This is in accordance with Art. 6(2) GDPR (processing is necessary for the performance of a contract to which you are a party, or for taking steps at your request prior to entering into a contract).

If we have your consent to process your personal data, the legal basis for this is Art. 6(1)(a) of the EU General Data Protection Regulation (GDPR).

When processing personal data necessary for the performance of a contract with you, Art. 6(1)(b) GDPR serves as the legal basis. This also applies to processing operations that are necessary for the implementation of pre-contractual measures.

If you provide us with health data (e.g. allergens or intolerances) that is important for your stay on our ships, we will process this data on the basis of your express and informed consent, in accordance with Art. 9(2)(a) GDPR. We will only use this data to provide services on board (catering). This data will not be used for any other purpose. You can revoke this consent at any time via all communication channels.

TRANSFER OF PERSONAL DATA TO THIRD PARTIES

Where necessary, your personal data may be passed on to our service providers to make travel arrangements. We only pass on data to third parties that is necessary for providing travel services and for billing purposes (e.g. contract data to the airline and data from the ship's manifest to the port authorities). These service providers are bound by legal obligations to comply with all data protection regulations and further requirements specified by us.

When booking a cruise, we also collect personal data from fellow travellers. Therefore, we ask that you ensure this data is provided to us with the consent of your fellow travellers. The personal data of children and young people (under 18 years of age) is only collected, stored and used for the purpose of travel arrangements.

We only collect or transfer personal data to government institutions and authorities within the framework of mandatory legal provisions.

DATA TRANSFER TO COUNTRIES OUTSIDE THE EU

If necessary to fulfil travel contracts, we may transfer your data to non-EU recipients, provided we can ensure the recipient guarantees an adequate level of data protection and there are no legitimate reasons to oppose the transfer. To ensure that the data recipient affords an adequate level of protection, we utilise the model contracts of the EU Commission for the transfer of personal data to third countries.

ORIGIN OF DATA, IF THE DATA WAS NOT COLLECTED FROM THE DATA SUBJECT

If the data was not collected directly from the data subject, we receive personal data to fulfil a contract from travel agencies, travel agents or tour operators.

TYPE OF DATA PROCESSED AND PERIODS FOR THE DELETION

The following data is necessary for the fulfilment of the contract:

1. Contract data:

Last name, first name, form of address, street, house number, postal code, city, country, credit card data (PCI standard), telephone number, email address

Contract data is deleted after a period of 10 years in accordance with legal requirements (German tax law).

2. Manifest data:

Gender, passport/identity card number, nationality, date of birth, emergency contact, voluntary additional information

Manifest data is deleted 2 years after the conclusion of travel (EU Package Travel Directive).

RIGHTS OF THE DATA SUBJECT

1. Right to information:

Pursuant to Article 15 GDPR, data subjects have the right to obtain information from the controller about which personal data of theirs is stored by that controller.

2. Right to correction:

If a data subject finds that his/her personal data on file are incorrect, these data must be corrected pursuant to Article 16 GDPR.

3. Right of deletion:

Data subjects have the right pursuant to Article 17 GDPR to request the deletion of their data. Deletion is only permitted, however, after any statutory retention periods have elapsed.

4. Restriction from processing:

You may have the right to restrict data from processing pursuant to Article 18 GDPR under certain circumstances (such as if you as the data subject disagree with the data processor as to whether data stored are correct).

5. Objection:

Pursuant to Article 21 GDPR, you may object to the processing of your personal data at any time with effect for the future. Please note that if you file an objection with respect to mandatory data required for the use of our offer, you will no longer be able to use the offer.

6. Data portability: Pursuant to Article 20 GDPR, you have the right to data portability in certain cases. This only applies to data collected on the basis of your consent or for the performance of a contract.

If you wish to exercise your data subject rights, please contact A-ROSA Flussschiff GmbH or A-ROSA Reederei GmbH and/or the Data Protection Officer in person or in writing (see contact details above).

7. Right to file a complaint: If you believe that your personal data have been processed in violation of data protection law, you can contact the data protection officer of A-ROSA Flussschiff GmbH in line with Article 38 (3) GDPR (see the 'Data Protection Officer' section for contact details), or the competent supervisory authority in line with Article 77 (1) GDPR. The supervisory authority responsible for A-ROSA Flussschiff GmbH is:

The Commissioner for Data Protection and Freedom of Information of the Federal State of Mecklenburg-Vorpommern
Werderstraße 74a
19055 Schwerin, Germany

Phone: 0049 385 59494 0

Fax: 0049 385 59494 58

Email: info@datenschutz-mv.de

Website: www.datenschutz-mv.de; www.informationsfreiheit-mv.de (website only available in German)