

## Information on data processing

Responsible handling of our guests' personal data is a matter of principle for us. The protection of your personal data is important to us. A-ROSA Flussschiff GmbH and A-ROSA Reederei GmbH are jointly responsible for data processing.

According to Article 13 and 14 of the EU Data Protection Regulation (DS-GVO), there are information obligations when collecting personal data. For this reason, the following information is brought to your attention:

### NAME AND CONTACT DETAILS OF THE RESPONSIBLE PERSON

<p>A-ROSA Flussschiff GmbH,          Loggerweg 5          18055 Rostock, Germany          service@a-rosa.de          phone +49 381 440 40 100</p> <p>Executive management:          Mr Jörg Eichler</p>	<p>A-ROSA Reederei GmbH,          Kasernenstrasse 92          7000 Chur, Switzerland          office.fluss@a-rosa.de          phone +41 812543840</p> <p>Executive management:          Mr Markus Zoepke, Mrs Daniela Sandmann</p>
---	--

### DATA PROTECTION OFFICER

Data Protection Officer: Mr Gunar Laaser  
 E-Mail: datenschutzbeauftragter@a-rosa.de

### PURPOSE OF PROCESSING

As a tour operator, A-ROSA Flussschiff GmbH and A-ROSA Reederei GmbH collect, process and use their personal data in prospect and customer administration and customer support only in accordance with the statutory provisions. The data is only collected and processed in the context of the fulfilment of travel bookings/travel contracts with the associated services. This includes, among other things, information for the ship manifest, opinion surveys and the assessment of travel services. The A-ROSA Reederei GmbH is responsible for the operational process of your trip. It processes the collected data for the purpose of the contractual provision of services.

The collection, processing and use of data is carried out within the framework of the conduct of business for the purposes stated above. If required by law, your data will be stored as evidence in accordance with the requirements for the tax authorities.

The following overview shows the data processing responsibilities:

Processing stage	Responsible
Collection of data subjects, Systematisation (organisation, ordering, matching, linking), Provision (retrieval, use, transmission, dissemination), Processing (adaptation, modification, restriction, deletion, destruction)	A-ROSA Flussschiff GmbH and A-ROSA Reederei GmbH
Data storage (in the CRM)	A-ROSA Flussschiff GmbH

### LEGAL BASES OF PROCESSING

The data processing is based on your request / interest and is necessary according to Art. 6 (2) DS-GVO (the processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures taken at the request of the data subject) for the aforementioned purposes for the adequate processing of the travel booking.

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

When processing personal data that is required to fulfil a contract with you, Art. 6 para. 1 lit. b DSGVO serves as the legal basis. This also applies to processing operations that are necessary for the implementation of pre-contractual measures.

### DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

Your personal data may be passed on to our service providers as part of the travel processing. We only pass on the data to third parties that are necessary for the provision of the travel service and its billing (e.g. contract data to the airline, data from the ship manifest to the port authorities). In addition to their legal obligation to comply with all data protection regulations, these service providers are also bound by other data protection-related specifications instructed by us.

When booking a trip, we also collect personal data from fellow passengers. We would therefore ask you to ensure that this data is provided to us with the consent of the fellow travellers. Personal data of children and adolescents (under 18 years of age) will only be collected, stored and used for the purpose of travel arrangements.

Personal data will only be collected and transmitted to state institutions and authorities within the framework of mandatory legal provisions.

## DATA TRANSFER TO COUNTRIES OUTSIDE THE EU

Insofar as it is necessary for the purpose of travel processing, we may also transfer your data to recipients outside the EU if it is ensured that the recipient of the data guarantees an adequate level of data protection and no other interests worthy of protection speak against the transfer of data. To ensure an adequate level of protection for the recipient of the data, we use in particular the EU Commission's model contracts for the transfer of personal data to third countries.

## ORIGIN OF THE DATA IF THE DATA WERE NOT COLLECTED FROM THE DATA SUBJECT

Where the data has not been collected directly from the data subject, we receive personal data for the fulfilment of a contract from travel agencies, travel agents or tour operators.

## TYPE OF DATA PROCESSED AND DELETION DEADLINES

We require the following data for the fulfilment of the contract / for the execution of the trip:

**1. Contract data:**

Name, first name, title, street, house number, postcode, city, country, credit card details (PCI Standard), telephone number, e-mail address, if applicable.

The deletion of data relevant to the contract is carried out in accordance with legal requirements and takes place after 10 years (tax law).

**2. Ship manifest data:**

Gender, passport/ID card number, nationality, date of birth, emergency telephone number, voluntary additional information

Ship manifest data is deleted 2 years after the end of the trip (EU Package Travel Directive).

## AFFECTED RIGHTS

**1. Information:**

According to Article 15 of the GDPR, data subjects have the right to obtain information from the controller about the personal data stored by the controller.

**2. Correction:**

If data subjects discover that the personal data stored about them is incorrect, it must be corrected in accordance with Article 16 of the GDPR.

**3. Deletion:**

According to Article 17 of the GDPR, data subjects have the right to request the deletion of their data. However, deletion is only permissible if this does not conflict with any statutory retention periods.

**4. Restriction of processing:**

In certain cases (e.g. if the data subject and the data processor do not agree on whether the stored data is correct), you have a right to restriction of processing under Article 18 of the GDPR.

**5. Contradiction:**

In accordance with Article 21 DS-GVO, you can object to the processing of your personal data at any time with effect for the future. Please note that you will no longer be able to use our offer if you object to the mandatory data required for the use of our offer.

**6. Data transferability:**

According to Article 20 of the GDPR, there is a right to data portability for certain processing operations. This only applies to data collected on the basis of consent or for the performance of a contract.

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

**7. Rights of appeal:**

If you are of the opinion that the processing of your personal data violates data protection law, you can contact the data protection officer of A-ROSA Flussschiff GmbH in accordance with Article 38 (3) DS-GVO (for contact details, see section Data Protection Officer) or the competent supervisory authority in accordance with Article 77 (1) DS-GVO. The competent supervisory authority for A-ROSA Flussschiff GmbH is:

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

Phone: +49 385 59494 0

Fax: +49 385 59494 58

E-Mail: [info@datenschutz-mv.de](mailto:info@datenschutz-mv.de)

Website: [www.datenschutz-mv.de](http://www.datenschutz-mv.de); [www.informationsfreiheit-mv.de](http://www.informationsfreiheit-mv.de)