

1. Person responsible and content of this privacy policy

We, the **Hotel Bären Wengen AG** (Am Acher 1363, 3823 Wengen, Switzerland) are the operator of the Hotel Bären as well as the website **www.baeren-wengen.ch** and are responsible for the data processing listed in this data protection declaration, unless otherwise stated.

So that you know what personal data we collect from you and for what purposes we use it, please take note of the following information. In protecting your data, we are guided primarily by the legal requirements of Swiss data protection law, in particular the Federal Data Protection Act (DPA), as well as the EU Data Protection Regulation (GDPR), the provisions of which may be applicable in individual cases.

Please note that the following information may be reviewed and amended from time to time. We therefore recommend that you consult this data protection declaration regularly. Furthermore, other companies are responsible under data protection law for individual data processing listed below or are jointly responsible with us, so that in these cases the information of these providers is also authoritative.

2. Contact person for data protection

If you have any questions about data protection or wish to exercise your rights, please contact our data protection contact by sending an email to the following address:
info@baeren-wengen.ch

3. Your rights

Provided that the legal requirements are met, you have the following rights as a person affected by data processing:

Right of access: You have the right to inspect your personal data stored by us at any time and free of charge if we are processing it. This gives you the opportunity to check what personal data we are processing about you and that we are using it in accordance with applicable data protection regulations.

Right to rectification: You have the right to have inaccurate or incomplete personal data rectified and to be informed of the rectification. In this case, we will inform the recipients of the data concerned of the adjustments made, unless this is impossible or involves disproportionate effort.

Right to deletion: You have the right to have your personal data deleted under certain circumstances. In individual cases, especially in the case of statutory retention obligations, the right to deletion may be excluded. In this case, the deletion may be replaced by a blocking of the data if the conditions are met.

Right to restrict processing: You have the right to request that the processing of your personal data be restricted.

Right to data transfer: You have the right to receive from us, free of charge, the personal data you have provided to us in a readable format.

Right of objection: You can object to data processing at any time, in particular for data processing in connection with direct advertising (e.g. advertising e-mails).

Right of withdrawal: In principle, you have the right to withdraw your consent at any time. However, processing activities based on your consent in the past do not become unlawful as a result of your revocation.

To exercise these rights, please send us an email to the following address:
info@baeren-wengen.ch

Right of complaint: You have the right to lodge a complaint with a competent supervisory authority, e.g. against the way your personal data is processed.

4. Data security

We use appropriate technical and organisational security measures to protect your personal data stored with us against loss and unlawful processing, namely unauthorised access by third parties. Our employees and the service companies commissioned by us are obliged by us to maintain confidentiality and data protection. Furthermore, these persons are only granted access to personal data to the extent necessary for the performance of their tasks.

Our security measures are continuously adapted in line with technological developments. However, the transmission of information via the Internet and electronic means of communication always involves certain security risks and we cannot guarantee the security of information transmitted in this way.

5. Contact us

If you contact us via our contact addresses and channels (e.g. by e-mail, telephone or contact form), your personal data will be processed. The data you have provided us with, e.g. the name of your company, your name, your function, your e-mail address or telephone number and your request, will be processed. In addition, the time of receipt of the request is documented. Mandatory information is marked with an asterisk (*) in contact forms.

We process this data exclusively in order to implement your request (e.g. providing information about our hotel, support in the processing of contracts such as questions about your booking, incorporating your feedback into the improvement of our service, etc.). The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 para. 1 lit. f EU-DSGVO in the implementation of your request or, if your request is directed towards the conclusion or execution of a contract, the necessity for the implementation of the necessary measures within the meaning of Art. 6 para. 1 lit. b EU-DSGVO.

6. Use of your data for marketing purposes

6.1 Central data storage and analysis in the CRM system

If it is possible to clearly identify you, we will store and link the data described in this data protection statement, i.e. in particular your personal details, your contact details, your contract details and your surfing behaviour on our websites, in a central database. This serves the efficient administration of customer data and allows us to adequately respond to your requests and enables the efficient provision of the services you have requested and the processing of the associated contracts. The legal basis for this data processing is our legitimate interest in the efficient management of user data within the meaning of Art. 6 (1) f EU-DSGVO.

We evaluate this data in order to further develop our offers in a needs-oriented manner and to display and suggest the most relevant information and offers to you. We also use methods that predict possible interests and future orders based on your website use. The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 Para. 1 lit. f EU-DSGVO in carrying out marketing measures.

6.2 Email marketing and newsletters

If you register for our e-mail newsletter (e.g. when opening or within your customer account), the following data will be collected. Mandatory data is marked with an asterisk (*) in the registration form:

- E-mail address
- Salutation
- First and last name

In order to avoid misuse and to ensure that the owner of an e-mail address has actually given their consent themselves, we use the so-called double opt-in for registration. After sending the registration, you will receive an e-mail from us containing a confirmation link.

In order to definitely register for the newsletter, you must click on this link. If you do not click on the confirmation link within the specified period, your data will be deleted again and our newsletter will not be sent to this address.

By registering, you consent to the processing of this data in order to receive messages from us about our hotel and related information on products and services. This may also include invitations to participate in competitions or to evaluate one of the aforementioned products and services. The collection of the salutation and the name allows us to verify the allocation of the registration to a possibly already existing customer account and to personalise the content of the mails. The link to a customer account helps us to make the offers and content contained in the newsletter more relevant to you and better tailored to your potential needs.

We will use your data for e-mailing until you revoke your consent. You can revoke your consent at any time, in particular via the unsubscribe link in all our marketing emails.

Our marketing emails may contain a so-called web beacon or 1x1 pixel (tracking pixel) or similar technical aids. A web beacon is an invisible graphic that is linked to the user ID of the respective newsletter subscriber. For each marketing email sent, we receive information on which addresses have not yet received the email, to which addresses it has been sent and to which addresses it has been sent.

which addresses failed to send the email. We also see which addresses opened the email, for how long and which links they clicked on. Finally, we also receive information about which addresses have unsubscribed. We use this data for statistical purposes and to optimise the promotional e-mails in terms of frequency, timing, structure and content. This allows us to better tailor the information and offers in our emails to the individual interests of the recipients.

The web beacon is deleted when you delete the email. To prevent the use of the web beacon in our marketing e-mails, please set the parameters of your e-mail program so that HTML is not displayed in messages if this is not already the case by default. In the help sections of your email software you will find information on how to configure this setting, e.g. B. [here](#) for Microsoft Outlook.

By subscribing to the newsletter, you also consent to the statistical evaluation of user behaviour for the purpose of optimising and adapting the newsletter. This consent constitutes our legal basis for the processing of the data within the meaning of Art. 6 para. 1 lit. a EU-DSGVO.

We use **Microsoft's Outlook software for email marketing**. Therefore, your data is stored in a Microsoft database, which allows Microsoft to access your data if this is necessary for the provision of the software and for support in the use of the software. The legal basis for this processing is our legitimate interest within the meaning of Article 6 (1) lit. f EU-DSGVO in the use of third-party services.

7. Disclosure to and access by third parties

Without the support of other companies, we would not be able to provide our services in the desired form. In order for us to be able to use the services of these companies, it is also necessary to pass on your personal data to a certain extent. Such a transfer of your personal data may take place if it is necessary for the fulfilment of the contract you have requested, i.e. e.g. to restaurants or other third party providers for which you have made a reservation. The legal basis for these disclosures is the necessity for the fulfilment of the contract within the meaning of Art. 6 Para. 1 lit. b EU-DSGVO.

Data is also passed on to selected service providers and only to the extent necessary for the provision of the service. Various third party service providers are also explicitly mentioned in this privacy policy, e.g. in the sections on marketing. These are, for example, IT service providers (such as providers of software solutions), advertising agencies and consultancies. In addition, we transfer your data to companies affiliated with us in the group (cf. imprint). The legal basis for this data transfer is our legitimate interest within the meaning of Art. 6 Para. 1 lit. f EU-DSGVO in obtaining third-party services.

In addition, your data may be passed on, in particular to authorities, legal advisors or debt collection companies, if we are legally obliged to do so or if this is necessary to protect our rights, in particular to enforce claims arising from our relationship with you. Data may also be disclosed if another company intends to acquire our company or parts thereof and such disclosure is necessary to carry out due diligence or to complete the transaction. The legal basis for this data transfer is our legitimate interest within the meaning of Art. 6 (1) f EU-DSGVO in the protection of our rights and compliance with our obligations or the sale of our company.

Commented [MLL1]: In order for the transfer of personal data within the group to be legally permissible, the necessary foundations must be created. This includes in particular the conclusion of a so-called intercompany agreement, which ensures that personal data can be legally exchanged between the group companies. In this agreement, the hotels of the group secure among other things, compliance with data protection law. For this reason, it would also have to be ensured that all hotels in the group are compliant with data protection law.

8. Transfer of personal data abroad

We are also entitled to transfer your personal data to third parties abroad if this is necessary to carry out the data processing mentioned in this data protection declaration (see in particular sections 12-15). In doing so, the legal provisions on the disclosure of personal data to third parties will of course be complied with. If the country in question does not have an adequate level of data protection, we guarantee through contractual regulations that your data is adequately protected at these c o m p a n i e s .

9. Retention periods

We only store personal data for as long as is necessary to carry out the processing explained in this data protection declaration within the scope of our legitimate interest. In the case of contractual data, storage is prescribed by statutory retention obligations. Requirements that oblige us to retain data result from the provisions on accounting and from tax law regulations. According to these regulations, business c o m m u n i c a t i o n , concluded contracts and accounting vouchers must be stored for up to 10 years. As soon as we no longer need this data to perform services for you, the data will be blocked. This means that the data may then only be used if this is necessary to fulfil the storage obligations or to defend and enforce our legal interests. The data will be deleted as soon as there is no longer any obligation to retain the data and there is no longer any legitimate interest in r e t a i n i n g t h e d a t a .

A. Special notes for our website

10. Log file data

When you visit our website, the servers of our hosting provider **Microsoft Airport Z u r i c h , The Circle 02, 8058 Zurich, (server locations Zurich & Geneva)** temporarily store every access in a log file. The following data is collected without your intervention and stored until it is automatically d e l e t e d b y u s :

- the IP address of the requesting computer,
- the date and time of access,
- the name and URL of the retrieved file,
- the website from which the access was made, if applicable with the search word used,
- the operating system of your computer and the browser you use (incl. type, version and language setting),
- Device type in case of access by mobile phones,
- the city or region from where the access was made,
- the name of your Internet access provider.

This data is collected and processed for the purpose of e n a b l i n g the use of our website (connection establishment), to ensure system security and stability on a permanent basis, as well as for e r r o r and performance analysis and to enable us to optimise our website (see also section 13 for the last points).

In the event of an attack on the network infrastructure of the website or if there is a suspicion of other unauthorised or improper website use, the IP address and the other data will be evaluated for the purpose of clarification and defence and, if necessary, used in the context of criminal proceedings for the purpose of identification and civil and criminal proceedings against the users concerned.

Our legitimate interest in data processing within the meaning of Art. 6 (1) f EU-DSGVO lies in the purposes described above.

Finally, when you visit our website, we use cookies as well as applications and tools that are based on the use of cookies. In this context, the data described here may also be processed. You will find more details on this in the following sections of this data protection declaration, in particular section 11.

11. Cookies

Cookies are information files that your web browser stores on your computer's hard drive or memory when you visit our website. Cookies are assigned identification numbers that identify your browser and allow the information contained in the cookie to be read.

Among other things, cookies help to make your visit to our website easier, more pleasant and more meaningful. We use cookies for various purposes that are necessary, i.e. "technically required", for your desired use of the website. For example, we use cookies to identify you as a registered user after you have logged in, without you having to log in again each time you navigate the various sub-pages. The provision of the shopping basket and order function is also based on the use of cookies. Furthermore, cookies also perform other technical functions required for the operation of the website, such as so-called load balancing, i.e. the distribution of the performance load of the page to different web servers in order to relieve the servers. Cookies are also used for security purposes, for example to prevent the unauthorised posting of content. Finally, we also use cookies as part of the design and programming of our website, e.g. to enable the uploading of scripts or codes.

The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 para. 1 lit. f EU-DSGVO in providing a user-friendly and up-to-date website.

Most internet browsers automatically accept cookies. However, when you access our website, we ask for your consent to the technically unnecessary cookies we use, especially when using cookies from third-party providers for marketing purposes. You can use the corresponding buttons in the cookie banner to make your desired settings. Details of the services and data processing associated with the individual cookies can be found within the cookie banner and in the following sections of this data protection declaration.

You may also be able to configure your browser so that no cookies are stored on your computer or so that a message always appears when you receive a new cookie. On the following pages you will find explanations of how you can configure the processing of cookies in selected browsers.

- [Google Chrome](#)
- [Apple Safari](#)

Deactivating cookies may mean that you cannot use all the functions of our website.

Commented [MLL2]: The implementation of a cookie banner is necessary for the implementation of the legal data protection requirements for the use of cookies, in particular marketing cookies. This must ensure that all technically unnecessary cookies, especially analytics and marketing cookies, are only set when the user has consented to their use by clicking on a clearly described button.

12. Google SiteSearch / Google Custom Search Engine

This website uses the Google SiteSearch/Google Custom Search Engine of Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA). This enables us to provide you with an efficient search function on our website.

When using our search fields, your browser may transmit the log file data listed in section 10 (incl. IP address) as well as the search term you entered to Google if you have installed Java script in your browser. If you wish to prevent the transmission of data, you can deactivate Java Script in the browser settings (usually in the "Data protection" menu). Please note that the search function and other functions of the website may be impaired in this case.

The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 (1) lit. f EU-DSGVO in providing an efficient website search function.

For further processing of data by Google, please refer to Google's privacy policy: www.google.com/intl/de_de/policies/privacy.

13. Tracking and web analysis tools

13.1 General information on tracking

For the purpose of demand-oriented design and continuous optimisation of our website, we use the web analysis services listed below. In this context, pseudonymised usage profiles are created and cookies are used (please also refer to section 11). The information generated by the cookie about your use of this website is usually transmitted together with the log file data listed in section 10 to a server of the service provider, where it is stored and processed. This may also involve transmission to servers abroad, e.g. in the USA (see section 8, in particular on the guarantees taken).

By processing the data, we obtain the following information, among others:

- Navigation path followed by a visitor on the site (including content viewed and products selected or purchased or services booked),
- Dwell time on the website or sub-page,
- the sub-page on which the website is left,
- the country, region or city from where access is made,
- End device (type, version, colour depth, resolution, width and height of the browser window) and
- Returning or new visitor.

On our behalf, the provider will use this information to evaluate the use of the website, to compile reports on website activities for us and to provide other services associated with the use of the website and the internet for the purposes of market research and demand-oriented design of these internet pages. For these processing operations, we and the providers may be considered jointly responsible under data protection law up to a certain extent.

The legal basis for this data processing with the following tools is your consent within the meaning of Art. 6 para. 1 lit. a EU-DSGVO. You can revoke your consent at any time or revoke the

You can refuse processing by deactivating or switching off the relevant cookies in the settings of your web browser (see section 11) or by making use of the service-specific options described below.

For the further processing of the data by the respective provider as the (sole) responsible party under data protection law, in particular also a possible forwarding of this information to third parties such as authorities on the basis of national legal regulations, please refer to the respective data protection information of the provider.

13.2 Google Analytics

We use the web analytics service Google Analytics from Google Ireland Limited (Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland) or Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA) ("Google").

The data described about the use of the website may be transmitted to the servers of Google LLC. in the USA for the processing purposes explained (see section 13.1). The IP address is shortened by activating IP anonymisation ("anonymizeIP") on this website before transmission within the member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there.

Users can prevent the collection of the data generated by the cookie and related to the website use by the user concerned (incl. the IP address) to Google as well as the processing of this data by Google by downloading and installing the browser plugin at the following link:
<http://tools.google.com/dlpage/gaoptout?hl=de>. Further information on data protection at Google can be found [here](#).

14. Social media

14.1 Social media profiles

We have included links to our profiles in the social networks of the following providers on our website:

- Meta Platforms Inc, 1601 S California Ave, Palo Alto, CA 94304, USA;
- Instagram Inc. 1601 Willow Road, Menlo Park, CA 94025, USA;
- Twitter Inc. with its registered office at 1355 Market Street, Suite 900, San Francisco, CA 94103, USA;
- LinkedIn Unlimited Company, Wilton Place, Dublin 2, Ireland.

When you click on the icons of the social networks, you are automatically redirected to our profile in the respective network. This establishes a direct connection between your browser and the server of the respective social network. This provides the network with the information that you have visited our website with your IP address and clicked on the link.

If you click on a link to a network while you are logged into your user account with the network in question, the content of our website may be linked to your profile so that the network can assign your visit to our website directly to your account. If you wish to prevent this, you should log out before clicking on the corresponding links. A connection between your access to our website and your user account takes place in any case if you log in to the respective network after clicking on the link. For the associated

data processing, the respective provider is responsible under data protection law. Please therefore refer to the information on the network's website.

The legal basis for any data processing attributed to us is our legitimate interest within the meaning of Art. 6 (1) lit. f EU-DSGVO in the use and promotion of our social media profiles.

14.2 Social Media Plugins

On our website, you can use social plugins from the providers listed below:

- Meta Platforms Inc, 1601 S California Ave, Palo Alto, CA 94304, USA, [Privacy Policy](#);
- Instagram Inc, 1601 Willow Road, Menlo Park, CA 94025, USA, [Privacy Notice](#);
- Twitter Inc, 1355 Market Street, Suite 900, San Francisco, CA 94103, USA, [Privacy Policy](#);
- LinkedIn Unlimited Company, Wilton Place, Dublin 2, Ireland, [Privacy Notice](#).

We use the social plugins to make it easier for you to share content from our website. The social plugins help us to increase the visibility of our content on social networks and thus contribute to better marketing.

The plugins are deactivated by default on our websites and therefore do not send any data to the social networks when you simply call up our website. To increase data protection, we have integrated the plugins in such a way that a connection is not automatically established with the networks' servers. Your browser only establishes a direct connection to the servers of the respective social network when you activate the plugins and thus give your consent to the transmission and further processing of data by the providers of the social networks.

The content of the plugin is transmitted directly to your browser by the social network and integrated into the website by it. This provides the respective provider with the information that your browser has accessed the corresponding page of our website, even if you do not have an account with this social network or are not currently logged in to it. This information (including your IP address) is transmitted by your browser directly to a server of the provider (usually in the USA) and stored there. We have no influence on the scope of the data that the provider collects with the plugin, although from a data protection perspective we can be considered jointly responsible with the providers up to a certain extent.

If you are logged into the social network, it can assign your visit to our website directly to your user account. If you interact with the plugins, the corresponding information is also transmitted directly to a server of the provider and stored there. The information (e.g. that you like one of our products or services) may also be published on the social network and possibly displayed to other users of the social network. The provider of the social network may use this information for the purpose of placing advertisements and designing the respective offer to meet your needs. For this purpose, usage, interest and relationship profiles may be created, e.g. to evaluate your use of our website with regard to the advertisements displayed to you on the social network, to inform other users about your activities on our website and to provide other services associated with the use of the social network. The purpose and scope of the data collection and the further processing and use of the data by the providers of the social networks, as well as your rights in this regard and setting options for protecting your privacy, can be found directly in the data protection information of the respective provider.

Commented [MLL3]: In order to reduce the data protection risks when using social plug-ins, it should be ensured that the plug-ins are deactivated by default, such as by implementing the so-called "Shar-iff solution", in which simple HTML links that can be designed individually with CSS can be integrated into the website. You can find more information about this on the website [heise.de](https://www.heise.de).

If you do not want the provider of the social network to assign the data collected via our website to your user account, you must log out of the social network before activating the plugins. Your consent within the meaning of Art. 6 Para. 1 lit. a EU-DSGVO forms the legal basis for the data processing described. You can revoke your consent at any time by declaring your revocation to the provider of the plugin in accordance with the information in their data protection instructions.

15. Online advertising and targeting

15.1 In general

We use the services of various companies to provide you with interesting offers online. This involves analysing your user behaviour on our website and websites of other providers in order to then be able to show you online advertising that is individually tailored to you.

Most technologies for tracking your user behaviour and for the targeted display of advertising work with cookies (see also section 11), which can be used to recognise your browser across different websites. Depending on the service provider, it may also be possible for you to be recognised online even when using different end devices (e.g. laptop and smart phone). This may be the case, for example, if you have registered for a service that you use with several devices.

In addition to the data already mentioned, which is generated when websites are called up ("log file data", see section 10) and when cookies are used (section 11) and which may be passed on to the companies involved in the advertising networks, the following data in particular is used to select the advertising that is potentially most relevant to you:

- Information about you that you provided when registering or using a service from advertising partners (e.g. your gender, age group);
- User behaviour (e.g. search queries, interactions with advertising, types of websites visited, products or services viewed and purchased, newsletters subscribed to).

We and our service providers use this data to identify whether you belong to the target group we are addressing and take this into account when selecting the advertisements. For example, after you have visited our site, you may be shown advertisements for the products or services you have chosen when you visit other sites ("re-targeting"). Depending on the scope of the data, a profile of a user may also be created, which is automatically evaluated and the ads are selected according to the information stored in the profile, such as membership of certain demographic segments or potential interests or behaviour. Such ads may be presented to you on various channels, which in addition to our website or app (as part of onsite and in-app marketing) also include ads served through the online advertising networks we use, such as Google.

The data may then be analysed for the purpose of billing the service provider and assessing the effectiveness of advertising measures in order to better understand the needs of our users and customers and to improve future campaigns. This may also include information that the taking of an action (e.g. visiting certain sections of our websites or sending information) is due to a particular advertising ad. Furthermore, we receive from the

Service providers aggregate reports of ad activity and information about how users interact with our website and our ads.

The legal basis for this data processing is your consent within the meaning of Art. 6 Para. 1 lit. a EU DSGVO. You can revoke your consent at any time by rejecting or switching off the relevant cookies in the settings of your web browser (see section 11). Further options for blocking advertising can also be found in the information provided by the respective service provider, such as [Google](#).

15.2 Google Ads

This website uses the services of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google") for online advertising. Google uses cookies for this purpose, such as the so-called DoubleClick cookie, which enable your browser to be recognised when visiting other websites. The information generated by the cookies about your visit to these websites (including your IP address) will be transmitted to and stored by Google on servers in the United States (please also refer to section 8). Further information on data protection at Google can be found [here](#).

The legal basis for this data processing is your consent within the meaning of Art. 6 Para. 1 lit. a EU DSGVO. You can revoke your consent at any time by rejecting or deactivating the relevant cookies in the settings of your web browser (see section 11). Further options for blocking advertising can be found [here](#).

16. Use of our chat function

No chat function available at the time of writing (14.06.2023)

The legal basis for this data processing is our legitimate interest within the meaning of Art. 6 para. 1 lit. f EU-DSGVO in the use of up-to-date communication technologies or, if your request is directed towards the conclusion or execution of a contract, in the implementation of the necessary measures within the meaning of Art. 6 para. 1 lit. b EU-DSGVO.

17. Registration for a customer account

If you open a customer account on our website, we collect the following data, whereby mandatory data is marked with an asterisk (*) in the corresponding form:

- Personnel:
 - Salutation
 - Name
 - First name
 - Billing and, if applicable, delivery address
 - Birthday
 - Company name, company address and VAT no. for corporate clients
- Login data:
 - E-mail address
 - Password
- Further information:
 - Languages
 - Gender

We use the personal details to establish your identity and to check the requirements for registration. The email address and password are used together as login details to ensure that the correct person is using the website under your details. We also need your email address to verify and confirm the opening of your account and for future communication with you as required for the execution of the contract. In addition, this data is stored in the customer account for future bookings or contract conclusions. For this purpose, we also enable you to store further details in the account (e.g. your preferred means of payment).

We also use the data to provide an overview of the products ordered and bookings made (see in particular section **Fehler! Verweisquelle konnte nicht gefunden werden.** und 19) and to provide you with an easy way to manage your personal data, to administer our website and the contractual relationships, i.e. to establish, define the content of, process and amend the contracts concluded with you via your customer account (e.g. in connection with your booking with us).

We process the information on language and gender in order to display offer suggestions on the website that are best tailored to your profile or your personal needs, for statistical recording and evaluation of the selected offers and thus to optimise our suggestions and offers.

The legal basis for the processing of your data for the aforementioned purpose is your consent in accordance with Art. 6 Para. 1 lit. a EU-DSGVO. You can revoke your consent at any time by removing the information from your customer account or by deleting your customer account or having it deleted by notifying us.

To avoid misuse, you must always keep your login details confidential and should close the browser window when you have finished communicating with us, especially if you share the computer with others.

18. Order via our online shop

On our website you have the opportunity to order a wide range of products and vouchers. For this purpose, we collect the following data, whereby mandatory data is marked with an asterisk (*) in the corresponding form:

- Salutation
- First name
- Last name
- Company
- Street and house number
- Address suffix
- POSTCODE
- Location
- Country
- Telephone number
- E-mail
- Payment method
- Shipping method
- Yes, I would like to subscribe to your newsletter.
- I confirm the accuracy of the information provided and have read and accept the General Terms and Conditions and the Privacy Policy.

We use this data and other data voluntarily provided by you only to process your order in accordance with your wishes. The processing of this data is therefore carried out in accordance with Art. 6 Para. 1 lit. b EU-DSGVO for the implementation of pre-contractual measures as well as for the execution of a contract.

19. Booking on the website, by correspondence or by telephone call

When you make bookings or order vouchers either via our website, by correspondence (e-mail or letter post) or by telephone call, we collect the following data, whereby mandatory data is marked with an asterisk (*) in the relevant form:

- Salutation
- First name
- Last name
- Street and no.
- POSTCODE
- Location
- Country
- Date of birth
- E-mail address
- Telephone number
- Language
- Credit card information

We will only use this data and other information voluntarily provided by you (e.g. expected arrival time, motor vehicle registration plate, preferences, remarks) to process the contract, unless otherwise stated in this data protection declaration or you have separately consented to this. We will process the data by name in order to record your booking as requested, to provide the booked services, to contact you in the event of any uncertainties or problems and to ensure correct payment. Your credit card details will be automatically deleted after your departure.

The legal basis for data processing for this purpose is the fulfilment of a contract according to Art. 6 para. 1 lit. b EU-DSGVO or your consent according to Art. 6 para. 1 lit. a EU-DSGVO. You can revoke your consent at any time with effect for the future.

20. Online payment processing

If you make bookings or purchase products for a fee on our website, depending on the product or service and the desired method of payment - in addition to the information provided in section **Error! The source of the link could not be found.** or point 19 - you may be required to provide further data, such as your credit card details or the login to your payment service provider. This information, as well as the fact that you have purchased a service from us for the amount and at the time in question, will be forwarded to the respective payment service providers (e.g. providers of payment solutions, credit card issuers and credit card acquirers). Please always refer to the information provided by the respective company, in particular the data protection declaration and the general terms and conditions. The legal basis for this transfer is the fulfilment of a contract in accordance with Art. 6 Para. 1 lit. b EU-DSGVO.

We collect and process the data only to process the reservation, in particular to compile your reservation request according to your wishes, to make the reservation and to contact you in case of uncertainties or problems.

The legal basis for processing your data for this purpose is the fulfilment of a c o n t r a c t pursuant to Art. 6 para. 1 lit. b EU-DSGVO.

21. Bookings via booking platforms

If you make bookings via a third-party platform (i.e. via booking.com, Hotel, Escapio, Expedia, Holiday-check, Hotel Tonight, HRS, Kayak, Mr. & Mrs. Smith, Splendia, Tablet Hotels, Tripadvisor, Trivago, Weekend4Two), we receive various personal information from the respective platform operator in connection with the booking made. As a rule, this is the data listed in section 19 of this privacy policy. In addition, we may receive enquiries about your booking. We will process this data by name in order to record your booking as requested and to provide the booked services. The legal basis for data processing for this purpose lies in the implementation of pre-contractual measures and the fulfilment of a contract in accordance with Art. 6 Para. 1 lit. b EU-DSGVO.

Finally, we may be informed by the platform operators of disputes relating to a booking. In the process, we may also receive data on the booking process, which may include a copy of the booking confirmation as proof of the actual booking completion. We process this data to protect and enforce our claims. This is our legitimate interest within the meaning of Art. 6 para. 1 lit. f EU-DSGVO.

Please also note the information on data protection of the respective booking platform.

22. Submitting ratings

In order to help other users with their purchase decision and to support our quality m a n a g e m e n t (in particular the processing of negative feedback), you have the p o s s i b i l i t y on our website to rate your stay with us. The data that is processed and published on the website is the data that you have made available to us, i.e. in addition to your evaluation and its time, p o s s i b l y also a comment that you have added to your evaluation or the name that you have given. The legal basis for data processing is your consent within the meaning of Art. 6 Para. 1 lit a EU-DSGVO.

We reserve the right to delete unlawful ratings and to contact you in case of suspicion and to ask you to comment. The legal basis for this processing is our legitimate interest within the meaning of Art. 6 (1) f EU-DSGVO in the provision of the comment and rating function and the prevention of abuse in its use.

23. Application for a vacant position

You have the option of applying to us spontaneously or via a corresponding e-mail address for a specific job advertisement. For this purpose, we collect the following data, whereby mandatory data are marked with an asterisk (*) in the corresponding form:

- First name
- Name
- E-mail address
- Application documents (e.g. CV, letter of motivation, references, etc.)

We use this and other data you provide voluntarily to review your application. Application documents of unsuccessful applicants will be deleted after the expiry of the

The data will be deleted after the application process, unless you explicitly agree to a longer retention period or we are legally obliged to retain the data for a longer period.

The legal basis for the processing of your data for this purpose is therefore the execution of a contract (pre-contractual phase) in accordance with Art. 6 para. 1 lit. b EU-DSGVO.

B. Data processing in connection with your stay

24. Data processing for the fulfilment of legal reporting obligations

Upon arrival at our hotel, we may require the following information from you and your companions (mandatory *):

- First and last name
- Postal address and canton
- Date of birth
- Nationality
- Official identification card and number
- Arrival and departure day

We collect this information in order to comply with legal reporting obligations, which arise in particular from hospitality or police law. Insofar as we are obliged to do so under the applicable regulations, we forward this information to the competent police authority.

The processing of this data is based on a legal obligation within the meaning of Art. 6 para. 1 lit. c EU-DSGVO.

25. Recording of purchased services

If you purchase additional services during your stay (e.g. wellness, restaurant, activities), we will record the subject of the service and the time of the service purchase for billing purposes. The processing of this data is necessary in the sense of Art. 6 Para. 1 lit. b EU-DSGVO for the processing of the contract with us.

26. Guest feedback

If you have given us your e-mail address in connection with your booking, you will receive an electronic form after departure. For this purpose, we collect the following data, whereby mandatory data in the corresponding form are marked with an asterisk (*):

- First and last name
- Age
- Nationality
- Length of stay

The information provided is voluntary and serves us to continuously improve our offer and our services and to adapt them to your needs. We will use the information provided to us exclusively for statistical purposes, unless otherwise stated in this data protection declaration.

or you have not separately consented to this. We will process the data by name in order to contact you in the event of any uncertainties.

For the aforementioned purposes, the legal basis of the processing is our legitimate interest within the meaning of Art. 6 (1) lit. f EU-DSGVO.

27. Video surveillance

In order to prevent misuse and to take action against illegal behaviour (especially theft and damage to property), the entrance area and the publicly accessible areas of our hotel are monitored by cameras. The image data is only viewed if there is a suspicion of illegal behaviour. Otherwise, the images are automatically deleted after 72 hours.

For the provision of the video surveillance system, we rely on a service provider who may have access to the data insofar as this is necessary for the provision of the system. Should the suspicion of illegal behaviour be substantiated, the data may then be passed on to consulting companies (in particular our law firm) and authorities to the extent necessary for the enforcement of claims or the filing of charges.

The legal basis is our legitimate interest within the meaning of Art. 6 (1) f EU-DSGVO in protecting our property and safeguarding and enforcing our rights.

28. Use of our WiFi network

In our hotel you have the possibility to use the WiFi network operated by **Hotel Bären Wengen AG (Am Acher 1363 3823 Wengen, Switzerland)** free of charge. To prevent misuse and to take action against illegal behaviour, prior registration is required. In doing so, you provide the following data to **Hotel Bären Wengen AG**:

- Mobile phone number
- MAC address of the terminal (automatic)

In addition to the above data, data on the hotel visited, including the time, date and terminal device, is recorded each time the WiFi network is used. The legal basis for this processing is your consent within the meaning of Art. 6 Para. 1 lit. a EU-DSGVO. The customer can revoke his registration at any time by notifying us.

Hotel Bären Wengen AG must comply with the legal obligations of the Federal Act on the Surveillance of Postal and Telecommunications Traffic (BÜPF) and the associated ordinance. If the legal requirements are met, the operator of the WiFi must monitor the use of the Internet and data traffic on behalf of the competent authority. The operator of the WiFi may also be obliged to disclose the customer's contact, usage and boundary data to the authorised authorities. The contact, usage and boundary data shall be stored for 6 months and then deleted.

The legal basis for this processing is our legitimate interest within the meaning of Art. 6 para. 1 lit. f EU-DSGVO in providing a Wifi network in compliance with the applicable legal requirements.

29. Payment processing

If you purchase products or services in our hotel using electronic means of payment or pay for your stay, the processing of personal data is required. By using the payment terminals, you transmit the information stored in your means of payment, such as the name of the cardholder and the card number, to the payment service providers involved (e.g. providers of payment solutions, credit card issuers and credit card acquirers). They also receive the information that the means of payment was used in our hotel, the amount and the time of the transaction. Conversely, we only receive the credit note for the amount of the payment made at the corresponding time, which we can assign to the relevant voucher number, or information that the transaction was not possible or was cancelled. Please always refer to the information provided by the respective company, in particular the data protection declaration and the general terms and conditions. The legal basis for this transmission is the fulfilment of the contract with you in accordance with Art. 6 Para. 1 lit. b EU-DSGVO.
