

## **LGT Solutions s.r.o General Data Protection Regulations 2018 Compliance**

### **1 General Regulations**

LGT Solutions s.r.o, trading as LGT Golf reserves the right to amend the existing data protection regulations in strict accordance with prevailing legal norms at any time.

#### **1.1 Personal Data**

Your voluntarily transmitted personal details (through submission in the online forms, by phone or e-mail, as well as those sent by your group coordinator) will be collected, saved and processed in accordance with the most recent legislation on data protection (EU-GDPR 2018).

Flight bookings, additional bookings & hotel bookings: Bookings via LGT Golf can only be carried out by collecting, saving and processing your personal data. This is solely for the purpose of organising and realising the event. Your data will only be passed on to third parties who are directly involved in running the event and if the organisational process makes it necessary – in accordance with your bookings (airline, hotel, transport companies, travel insurance, etc.). Those third-party organisations that we use are also GDPR compliant.

#### **1.2 Photos/Films**

By signing the contract, you grant permission to LGT Solutions s.r.o to use photos/films taken from you respectively your company presence by our official photographer (team) onsite during the meeting for marketing purposes (event reporting, promotion of follow-up events & self-marketing) for an indefinite period. If you do not want to have any photos/films published, taken of you, you may contact us at any time: [office@lgtgolf.com](mailto:office@lgtgolf.com)

#### **1.3 Links to other websites**

Links provided by LGT Solutions s.r.o (program booklets, invitation management etc.) may contain links to other websites. LGT Solutions s.r.o is not responsible for the data you provide on other websites. Our partner companies are also bound to act according to EU-GDPR, the implementation however rests with each company individually. Our data protection guidelines are solely applicable to data controlled by us LGT Solutions s.r.o

### **2 Information Obligation according to Art. 12-14 EU-GDPR**

We are pleased to provide you with all information on the type, purpose and scope of the processing activities of your personal data.

#### **2.1 Controller**

LGT Solutions s.r.o, Zahradnickova 1220/20 150 00 Prague

T: +44 208 0681256

E-Mail: [dataprotection@lgtolutions.com](mailto:dataprotection@lgtolutions.com)

Responsible Manager: Nicholas Boekdrukker

Data Protection Coordinator: Nicholas Boekdrukker2.5 Transfer to Third Country

## 2.2 Purposes of Processing

Depending on the participant status and the bookings of the data subject, the data is processed for one or more of the purposes listed below.

Data Categories	Processing Purpose	Recipient Categories
name contact data address data invoice data credit card data hotel length of stay contact person frequent flyer number travel data (only if necessary) passport data (only if necessary) special diet (sensitive data)	Travel Bookings, Additional Bookings, Settlement and Controlling	flight companies, service providers (fulfilment agents)
name contact data registration data additional bookings hotel booking data bank data (if necessary) credit card data (if necessary)	General Organisation / Accounting	flight companies, hotels, service providers that have a meal plan as part of their fulfilment
name contact data	Marketing	responsible authorities, bank, fiscal office, tax consultant, service providers (fulfilment agents)

### 2.3 Legal Basis for the data processing purposes

Processing Purpose	Legal Basis
Travel Bookings, Additional Bookings, Settlement and Controlling	binding completion of the booking (flight, hotel, car rental, etc.) written confirmation of the group coordinator that participant data may be used binding booking of a travel insurance of the data subject – LGT Solutions s.r.o acts as intermediary only
Marketing & Development	consent of the data subject (sensitive data) legitimate interest of the controller (see point 4.1)

### 2.4 Third Party Data Recipients – Categories

Processing Purpose	Data Categories
Travel Bookings, Additional Bookings, Settlement and Controlling	name contact data address data/invoice data credit card data hotel length of stay contact person frequent flyer number travel data (only if necessary) passport data (only if necessary) special diet (sensitive data)
General Organisation / Accounting	name contact data additional bookings hotel booking data bank data (only if necessary) credit card data (only if necessary)
Marketing & Development	name contact data photos/films

The recipients only receive the data they require, not your full data record. Your data will only be forwarded if the organisational process makes it necessary – in accordance with your bookings – and if a legal basis exists.

Due to the GDPR Art 49, 1b: The transfer of data to third countries is necessary for the performance of a contract/business relation between the data subject and the controller. Only data that is actually required for the specified purpose may be collected and processed.

## **2.6 Data Storage Period**

Credit card guarantees (such as for hotel bookings) are reviewable and saved encrypted until 2 weeks after event start and irrecoverably deleted thereafter. Sensitive data (for example: special nutritional requirements), which are collected with the consent of the data subject, will be irrecoverably deleted after the end of the booking. All other data are stored for 7 years, to meet the retention period under Czech and EU Tax Laws.

## **2.7 E-Mail Servers**

Our Web and E-Mail servers are located in Switzerland and hosted by Infomaniak Network SA, who are fully GDPR Compliant. For more information on the GDPR of Infomaniak, incl. data processing and privacy policies see below.

<https://www.infomaniak.com/en/legal/general-data-protection-regulation>

## **3 Data Subject Rights**

We hereby inform you about your rights according to EU-GDPR:

### **3.1 Data Subject Rights acc. to Art. 15-21 EU-GDPR:**

- Right of access by the data subject
- Right to rectification
- Right to erasure 'right to be forgotten'
- Right to restriction of processing
- Right to data portability
- Right to object (in case of legitimate interest of the controller)

For detailed descriptions please see:

<http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679&from=EN>

© European Union, <http://eur-lex.europa.eu/> 1998-2018

### **3.2 Right to withdraw consent acc. to Art. 7 EU-GDPR**

Depending on your participant status, we kindly ask you for different declarations of consent. These are queried within the online forms or directly inquired from the affected person/group coordinator/company representative. The declarations of consent are not compulsory according to the EU GDPR. Each data subject has the right to withdraw his/her given consent(s) at any time. The withdrawal of the consent does not affect the legality of the processing carried out based on the declaration of consent until the withdrawal.

### **3.3 Right to lodge a complaint with a supervisory authority acc. to Art. 77 EU-DSGVO**

Every data subject has the right to lodge a complaint with a supervisory authority, if the data subject considers that the processing of personal data relating to him/her infringes to the EU-GDPR.

## **4 Description of other Purposes Legitimate Interests of the Controller acc. to Art. 6 (1) f) EU-GDPR**

### **4.1 Advertising/Marketing**

Processing data of the data subject to inform him/her about the above-mentioned event, as well as future and topic-related events.

## **5 Privacy Policy for the use of Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer to help the website analyse how visitors use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States . Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note 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 set out above.

You can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en>.

Please note that this website initializes Google Analytics with the setting "anonymizelp" This guarantees anonymized data collection by masking the last part of your IP address.

Further information concerning the terms and conditions of use and data privacy can be found at <http://www.google.com/analytics/terms/gb.html> or at [http://www.google.com/intl/en\\_uk/analytics/privacyoverview.html](http://www.google.com/intl/en_uk/analytics/privacyoverview.html)

## **6 Data Privacy for the use of social networks**

### **6.1 Facebook (Like Button)**

On our websites plug-ins of the social network Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA are integrated. You recognise these plug-ins by the Facebook logo or the Like-Button on our site. For an overview of Facebook plug-ins, please see here:

<http://developers.facebook.com/docs/plugins>. If you visit our websites, a direct connection between your browser and the Facebook server is established by this plug-in. By that Facebook receives information that you have visited our websites with your IP-address. If you click the Facebook "Like" button while you are logged on to your Facebook account you may link the contents of our websites to your Facebook account. Thereby Facebook can associate your visit of our websites to your Facebook account. We would like to point out that we as providers of these websites do not obtain knowledge about the contents of the transmitted data as well as the use of such by Facebook. For further information, please check the Privacy Policy of Facebook under <http://de-de.facebook.com/policy.php>. If you do not wish that Facebook associates your visit of our websites to your Facebook account, please log out of your Facebook account.

### **6.2 LinkedIn (Follow Button)**

Privacy Statement for Using a LinkedIn Share Button Our website contains plugins from the LinkedIn social network or LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, United States of America (hereafter referred to as "LinkedIn"). You can recognize the plugins of LinkedIn by the corresponding logo or the "recommend button". Please note that when you visit our website, the plugin establishes a connection between your respective internet browser and the LinkedIn server. LinkedIn is informed that our website has been visited with your IP address. If you click the "recommend button" of LinkedIn and at the same time you are logged into your account at LinkedIn, you have the opportunity to link content from our website to your profile page on LinkedIn profile. In doing so, you allow LinkedIn to assign your visit of our website to you or your user account. Please note that we do not obtain any knowledge of the content of the submitted data and its use by LinkedIn. For more details on collecting the data and your legal options, as well as setting options, please visit LinkedIn at <https://www.linkedin.com/legal/privacy-policy>.

### **6.3 Twitter**

On our websites functions of the service Twitter are integrated. These functions are offered by Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA. By using Twitter as well as the function "Re-Tweet" websites visited by you are linked to you Twitter account and posted to other users. In doing so, data will be transmitted to Twitter. We would like to point out that we as providers of this websites do not obtain knowledge about the contents of those data. For further information, please check the Privacy Policy of Twitter: <http://twitter.com/privacy>. The privacy settings of your Twitter account can be adjusted under <http://twitter.com/account/settings>