

# PRIVACY NOTICE

## PRIVACY NOTICE

### Robinson Club GmbH

**Trusted. Unique. Inspiring.** At TUI we create unforgettable moments for our customers across the world and make their dreams come true. Looking after the personal data you share with us is an important part of this. We want you to be confident that your data is safe and secure with us, and understand how we use it to offer you a better and more unique and inspiring experience. See the [TUI Group](#) website for more information about us.

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The data controller is Robinson Club GmbH (referred to in this Notice as “we” or “us”), part of the [TUI Group](#)

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

- What types of personal data we collect and why we collect it.
- When and how we may share personal data within the TUI Group and with other organisations.
- The choices you have, including how to access and update your personal data.

We have tried to keep this Notice as simple as possible, but if you are not familiar with terms such as data controller, special categories of personal data, then read about these and some others in [Key terms](#)

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## **Personal data we collect**

### **When you register for any of our services, you may provide us with:**

- Your personal details, including your address, email address, phone number and date of birth.
- Your account login details, such as your username and the password you chose.

### **When 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 one of our adverts, including those shown on other organisations' websites.
- Information about the way you access our digital services, including operating system, IP address, online identifiers and browser details.
- Social preferences, interests and activities.

### **When you buy our products in our shops or online, we may collect:**

- Passenger information, passport details, other ID document details.
- Insurance details.
- Relevant medical data and any special, dietary, religious or disability requests.
- Information about your purchases, including what you bought, when and where you bought it, how you paid for it and credit or other payment information.
- Information about your browsing behaviour on our websites and mobile apps.
- Information about when you click on one of our adverts, including those shown on other organisations' websites.
- Information about the way you access our digital services, including operating system, IP address, online identifiers and browser details.
- Social preferences, interests and activities.
- Your preferences concerning the accommodation.
- Your questions / comments / requests in connection with your hotel stay.

### **During your stay in our hotels we may collect:**

- Information about the traveller, passport data, other identification information
- Relevant medical data and any special, dietary requests or other food requirements due to religious reasons or reasons of physical impairment.
- Information about your purchases, such as what you purchased, when and where you purchased it, how you paid, and credit or other payment information.
- Information about reservations of services and activities (e.g. sports activities, table reservations, etc.).
- Data in connection with your questions / comments / complaints / wishes.
- If you arrive by personal car or motorbike, your license plate.
- Data necessary for childcare.
- Your IP address when using the hotel's WiFi for the fulfilment of legal obligations and for the provision of the internet connection.

**When you contact us or we contact you or you take part in promotions, competitions, surveys or questionnaires about our services, we may collect:**

- Personal data you provide when you connect with us, including by email, post and phone or through social media, such as your name, username and contact details.
- Details of emails and other digital communications we send to you that you open, including any links in them that you click on.
- Your feedback and contributions to customer surveys and questionnaires.

**Other sources of personal data**

- We may use personal data from other sources, such as specialist companies that supply information, retail partners and public registers.
- Your insurance company, their agents and medical staff may exchange relevant personal data and special categories of personal data with us in circumstances where we/they need to act on your behalf or in the interest of other customers or in an emergency.
- If you log-in using your social network credentials to connect to our platforms and online services e.g. Facebook, Google+ and Twitter, you will agree to share your user details with us. For example, your name, email address, date of birth, location and any other information you choose to share with us.
- We may use CCTV images, IP address and browser details collected in or in the immediate vicinity of our shops, premises, other buildings and cruise ships.

 **Personal data you provide about other individuals**

- We use personal data about other individuals provided by you, such as those people on your booking.
- By providing other people's personal data, you must be sure that they agree to this and you are allowed to provide it. You should also ensure that, where appropriate, they understand how their personal data may be used by us.

  **Using your personal data**

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

**To provide the products and services 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 want to buy and help you with any orders and refunds you may ask for.

### **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, customer loyalty or recognition programme(s) and other services.

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

We may use personal data to respond to and to manage security operations, accidents or other similar incidents, including medical and insurance purposes.

We may use personal data to carry out market research and internal research and development, and to develop and improve our product range, services, shops, IT systems, security, know-how and the way we communicate with you.

We use CCTV images to help maintain the safety of anyone working in or visiting our shops, premises and other buildings, and for the prevention, detection and prosecution of criminal offences. We may also rely on the images to establish, exercise or defend our legal rights.

### **To personalise your experience**

We want to ensure that marketing communications relating to our products and services, and those of our suppliers, retail partners and the [TUI Group](#), including online advertising, are relevant to your interests.

To do this, 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 enables us to tailor our communications to make them more relevant and interesting for you.

Looking at your browsing behaviour and purchases helps us to better understand you as a customer and it allows us to provide you with personalised offers and services.

We may also measure your responses to marketing communications relating to products and services we offer, which enables us to offer you products and services that better meet your needs as a customer.

If you do not want to receive a personalised service from us, you can change your preference online, over the phone or by writing (e.g. email) to us at any time. We will update our records as soon as we can.

### **To make contact and interact with you**

We want to serve you better as a customer so if you contact us, for example by email, post, and phone or via social media, we may use personal data to provide clarification or assistance to you.

We need to process your personal data so that we can manage any promotions and competitions you choose to enter, including those we run with our suppliers and retail partners. For example, if you win a prize.

We may invite you to take part in customer surveys, questionnaires and other market research activities carried out by the [TUI Group](#) and by other organisations on our behalf.

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

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

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## @ **Marketing communications**

From time to time we may send you relevant offers and news about our products and services in a number of ways, including by email. We may also send you information about other companies' products and services that we believe may be of interest to you. We will only do this if you previously agreed to receive these marketing communications.

When you book or register with us we will ask if you would like to receive marketing communications. You can change your marketing preferences by writing to us at any time: Email to [crm@robinson.com](mailto:crm@robinson.com) or in writing to Robinson Club GmbH, CRM Abteilung, Karl-Wiechert-Allee 4, 30625 Hannover Of course, the choice is entirely yours, but if you say you do not want to receive marketing information from us this will prevent you from receiving great offers or promotions that may be of interest to you.

You may still receive service-related communications from us. For example, confirming bookings you make with us and providing important information about the use of our products or services.

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## **Market research**

We like to hear your views to help us to improve our products and services, so we may contact you for market research purposes. You always have the choice about whether to take part or continue in our market research.

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## **Sharing personal data with suppliers and retail partners**

In order to provide products or services requested by you we may share personal data with suppliers of your travel arrangements, including airlines, hotels and transport companies.

We also work with carefully selected suppliers that carry out certain functions on our behalf. For example, companies that help us with IT services, storing and combining data, marketing, market research, processing payments and delivering products and services.

We may need to share personal data to establish, exercise or defend our legal rights; this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk.

When we share personal data with other organisations we require them to keep it safe, and they must not use your personal data for their own marketing purposes.

We only share the minimum personal data that enable our suppliers and retail partners to provide their services to you and us.

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### **Sharing personal data with regulatory authorities**

So that you can travel, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your personal data for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate.

Some countries will only permit travel if you provide your advance passenger data (for example [Caricom API Data](#) and [US Secure Flight Data](#)). These requirements may differ depending on your destination and you are advised to check. Even if not mandatory, we may assist where appropriate.

We may share the minimum personal data necessary with other public authorities if the law says we must, or we are legally allowed to do so.

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### **Sharing personal data within the TUI Group**

Our Privacy Notice applies to all of the services offered by the TUI Group but excludes services that have separate privacy notices that do not incorporate this Privacy Notice. We may share the minimum personal data necessary with other companies in the [TUI Group](#) for example, to provide the products and services you request; to manage and improve our products, services and day-to-day operations; to help to personalise your experience; where appropriate, to make contact and interact with you; and, if allowed and appropriate, for marketing or market research purposes.

We may also share personal data with an organisation we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with you. If the transfer or sale goes ahead, the organisation receiving your personal data can use your data in line with this Privacy Notice.

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### **Protecting your personal data**

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

The security of your data also depends on you. For example, where we have given you or where you have chosen a password for access to certain services, you are responsible for keeping this password confidential.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by organisations operating outside the EEA who work for us or for one of our suppliers. We put in place appropriate protections to make sure your personal data remains adequately protected and that it is treated in line with this Notice. These protections include, but are not

limited to, appropriate contract clauses, such as [standard contract clauses approved by the European Commission](#), and appropriate security measures.

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### **Data retention**

We will retain your personal data for only as long as it is necessary for the uses set out in this Privacy Notice and/or to meet legal and regulatory requirements. After this period, we will securely erase personal data. If data is needed after this period for analytical, historical or other legitimate business purposes, we will take appropriate measures to anonymise this data.

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### **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 computer, laptop or mobile device. Cookies help us to provide important features and functionality on our websites and mobile apps, and we use them to improve your customer experience. Please see our separate Cookie Notice.

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### **Links to other websites**

Our websites or mobile apps may contain links to websites operated by other organisations that have their own privacy notices. Please make sure you read the terms and conditions and privacy notice carefully before providing any personal data on another organisation's website as we do not accept any responsibility or liability for websites of other organisations.

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### **Social media features**

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



Please make sure you read their terms and conditions and privacy notice carefully before providing any personal data as we do not accept any responsibility or liability for these features.

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### **Accessing and updating your personal data; and complaints**

You have a right to ask for a copy of the personal data we hold about you, although you should be able to access online the personal data associated with your account or booking. You can write to us asking for a copy of other personal data we hold about you.

Please include any details to help us identify and locate your personal data. Where we can provide data access, we will do so free of charge except where further copies are requested in which case we may charge a reasonable fee based on administrative costs.

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

You can also ask for your personal data to be rectified or erased, to object to the processing of your personal data and, where technically feasible, to ask for personal data you provided to be transmitted to another organisation.

We will update or erase your data, unless we have to keep it for legitimate business or legal purposes.

You can also contact us if you have a complaint about how we collect, store or use your personal data. We aim to resolve complaints but if you are dissatisfied with our response, you may complain to the local data protection authority [https://www.lfd.niedersachsen.de/wir\\_ueber\\_uns/kontakt/kontakt-56137.html](https://www.lfd.niedersachsen.de/wir_ueber_uns/kontakt/kontakt-56137.html)

If you want to contact the local data protection authority:

Die Landesbeauftragte für den Datenschutz Niedersachsen, Prinzenstraße 5, 30159 Hannover

Tel.: +49 511 120-4500

Fax: +49 511 120-4599

E-Mail: [poststelle@lfd.niedersachsen.de](mailto:poststelle@lfd.niedersachsen.de)

Please submit your request or complaint in writing to the Legal Department/Data Protection Officer if you wish to complain to us too:

via E-Mail to [DPOHotels@tui.com](mailto:DPOHotels@tui.com)

Please note that we may ask you to verify your identity before we can act on your request or complaint. We may also ask you for more information to help ensure that you are authorised to make such a request or complaint when you contact us on behalf of someone else.

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## Legal basis for processing personal data

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

- We have your consent;

**Example: Customer account**

You give us permission to process your personal data when you register for a customer account.

- It is necessary for a contract with you or to take steps at your request prior to entering into a contract;

**Example: To provide the products and services 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 want to buy and help you with any orders and refunds you may ask for.

- It is necessary for us to comply with a legal obligation;

**Example: Sharing personal data with regulatory authorities**

So that you can travel, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your personal data for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate.

- It is necessary to protect your vital interests or those of another individual;

**Example: In an emergency**

Your insurance company, their agents and medical staff may exchange relevant personal data and special categories of personal data with us in circumstances where we/they need to act on your behalf or in the interest of other customers or in an emergency.

- It is in the public interest or we have official authority; or

**Example: Security operations**

We may use personal data to respond to and to manage security operations, accidents or other similar incidents, including medical and insurance purposes.

- It is in our or a third party's legitimate interests and these are not overridden by your interests or rights.

**Example: To personalise your 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 enables us to tailor our communications to make them more relevant and interesting for you.

Where we need to process special categories of personal data, for example health data for medical reasons, we will only do so if one or more additional conditions apply. For example, we have your explicit consent; it is necessary to protect the vital interests of you or another individual and you are physically or legally incapable of giving consent; it is necessary to establish, exercise or defend legal claims; it is necessary for reasons of substantial public interest.

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  **Changes to our Notice**

This 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 prominent notice on our website(s) including, if we believe it is appropriate, electronic notification of Privacy Notice changes.

Last update: **June 2018**.

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  **Key terms**

**Data controller:** The data controller determines the purpose and manner in which personal data is used.

**European Economic Area (EEA):** EU Member States plus Norway, Iceland and Lichtenstein.

**Online advertising:** Marketing messages that you may see on the internet.

**Special categories of personal data:** This are categories of personal data revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data, biometric data for the purpose of uniquely identifying a natural person; health data; and data concerning a natural person's sex life or sexual orientation.

**Caricom API Data:** Some or all of the Caricom states have entered into an agreement with the USA whereby advance passenger data, required by and provided to Caricom states for border security purposes, will be passed to the USA Department for Homeland Security for processing on behalf of those Caricom states. Please see the [Caricom website](#) for more details.

**US Secure flight Data:** The Transportation Security Administration (TSA) requires you to provide your full name, date of birth and gender for the purpose of watch list screening. You may also provide your Redress Number, if available. Failure to provide details may result in denial of transport or denial of authority to enter the boarding area. TSA may share information you provide with law enforcement or intelligence agencies or others under its published system of records notice. Please see the [TSA website](#) for more details.

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