Our data protection declaration

The protection of your personal data is a particular concern of ours. So, we process your data exclusively based on legal stipulations. We have taken the technical and organisational action in accordance with legal stipulations to ensure the protection of the data referring to your person.

Here you will find information concerning the handling of the data referring to your person when you visit our website. It is necessary for us to gather data referring to your person for the provision of the functions and services on our website. We herewith declare which data we gather about you, what it is required for and which rights you have with regard to your data.

The responsibility for processing of person-related data on this website lies with:

Großglockner Hochalpenstraßen Aktiengesellschaft

Rainerstraße 2, 5020 Salzburg, Austria

Tel.: +43 662 873 673 - 0 Fax: +43 (0) 662 / 873 673 - 113

Email: info@grossglockner.at

If you have any questions regarding data protection you can also contact our data protection facility:

Großglockner Hochalpenstraßen AG

Rainerstraße 2, 5020 Salzburg, Austria

Tel.: +43 662 87 36 73-0

Email: datenschutz@grossglockner.at

Informational use

If you use our website without transferring data to us in any other way (e.g. by registration or use of the contact form), we gather technically required data that is transferred automatically to our server, including:

- IP address
- Date and time of enquiry
- Content of request
- Access status/HTTP status code
- Browser type
- Language and version of browser software
- Operating system

This is required technically in order for us to be able to show you our website. We also use the data to guarantee the safety and stability of our website. The legal basis for this gathering is point (f) of Article 6(1) of the GDPR.

Enquiries

The email address, your name and your message made available to us in the framework of enquiries will be used by us exclusively for the purposes of processing of your enquiry, unless you have agreed to have additional informational material sent to you in the future.

Registration with Facebook Connect

You can also register using Facebook Connect instead of registering directly on our website. This service is offered by Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland.

If you decide to use registration by Facebook Connect and click on the button "Login with Facebook" / "Connect with Facebook" you will be automatically redirected to the Facebook platform. There you can log on with your user data. This links your Facebook profile to our website or our services. This link provides us with access to your Facebook data.

This is primarily:

- Facebook name
- Facebook Profile Picture and Title Picture
- Facebook Title Picture
- email address saved in Facebook
- Facebook ID
- Facebook Friends List
- Facebook Likes
- Date of birth
- Gender
- Country
- Language

This data is used for setting up, preparation and personalisation of your account.

Further information can be found in the Facebook conditions of use and the Facebook data protection stipulations. These are available at: https://de-de.facebook.com/about/privacy/ and https://www.facebook.com/legal/terms/.

Data storage webshop

We point out that, for purposes of simplified purchasing and for subsequent order processing, the IP data of the connection owner is stored by the webshop operator in the framework of cookies, as is the company, name, address, credit card number, date of birth, phone number, fax number and email address of the purchaser.

The data that you provide is required for fulfilment of the contract or for execution of pre-contractual actions. We cannot conclude the contract with you without this data. Data forwarding to third parties does not occur, with the exception of forwarding the credit card data to the handling banks/payment service providers for the purposes of charging the purchase price, to the transport company/delivery company that we commission to supply the goods, and to our tax advisors for the fulfilment of our legal tax obligations.

After conclusion of the purchase process we delete all the data we store. In the event of a contract agreement, all the data arising from the contractual arrangement is saved, up to the expiry of the retention period stipulated by tax law. In addition, the information concerning name, address, goods purchased and purchase date are also saved up to the expiry of product liability. The data processing takes place on the basis of the legal stipulations of Section 96(3) of the Austrian Telecommunications

Act (TKG) and point (a) (consent) and/or point (b) (necessary for the performance of a contract) of Article 6(1) of the GDPR.

Fotopoint

At the Kaiser-Franz-Josef-Höhe you can take a photograph of the fabulous scenery using the Fotopoint. By positioning in front of the camera and by actuating the camera trigger, the persons posing in front of the camera agree explicitly to having the photographs saved and published on the website for a period of 90 days. In addition, there is a possibility of downloading, printing and sending the photographs published on the website by email. The data quoted for email despatch (email address, name, text) is processed only for the process of despatch and is not saved.

Webcam

Along the Grossglockner High Alpine Road there are panorama cameras at the Edelweissspitze, at the Fuscher Törl and at the Kaiser-Franz-Josef-Höhe that are used for documenting the weather and nature using continuous photographs. These photographs are saved long-term for archive purposes and published on the website.

In addition, the latest photographs from the GROHAG independent webcams at the inn "Mankei Wirt", in the restaurant Fuscher Törl and at the Wallackhaus can be seen by all on the website.

Use of cookies

We use cookies to make it easier to use our website and to improve it. Cookies are pieces of text information that are saved on a computer when visiting a website via a browser. This permits recognition of a session, for example for continuous login on a website or for the shopping basket function in an online shop.

Most web browsers accept cookies automatically. You can delete saved cookies at any time via the settings on your web browser. You can also adapt your settings on the web browser so that no cookies are saved. This would then mean that not all the functions of our website are available.

Google Analytics

We use Google Analytics to analyse the use of our website and to improve it.

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files that are saved on your computer and which permit analysis of your use of the website. The information generated by the cookie concerning your use of this website is generally transmitted to a Google server in the USA and saved there. In the event of activation of IP anonymisation on this website, your IP address will first be abbreviated by Google within the member states of the European Union or in the other signatory countries to the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transferred to a Google server in the USA and there abbreviated. On behalf of the operator of this website, Google will use this information to evaluate the use of the website, to produce reports concerning the website activities and to provide other services connected to website usage and internet usage for the website operator. The legal basis for the processing of data with the aid of Google Analytics is point (f) of Article 6(1) of the GDPR. The IP address gathered from your browser in the framework of Google Analytics is not amalgamated with other Google data.

You can prevent storing of cookies by a setting on your browser software: we would point out, however, that in this case you may then not be able to use all the functions of this website to the full extent. In addition, you can prevent the gathering of data by cookies and your use of the website

(including your IP address) by Google and the processing of this data by Google, by downloading and installing the browser plug-in available from the following link:

http://tools.google.com/dlpage/gaoptout?hl=de

We use Google Analytics with the file extension "_anonymizelp()". This ensures that the IP addresses are abbreviated (so-called IP-Masking). This means that reference cannot be made to specific persons. Google participates in the EU-US Privacy Shield, <u>https://www.privacyshield.gov/EU-US-Framework</u>. This thus gives an appropriate level of data protection even in exceptional cases where Google transfers person-related data to the USA.

Information about Google: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001

Further information about the conditions of use of Google:

www.google.com/analytics/terms/de.html

Further information about data protection at Google: www.google.com/intl/de/analytics/privacyoverview.html

Universal Analytics

This website uses Google Analytics for equipment-spanning analysis. Each user receives a User ID for this purpose. You can deactivate the equipment-spanning analysis of your use in your customer account under "My Data", "Personal Data".

Google Adwords Conversion-Tracking

We use Google Adwords to show you advertising on Google and other third-party websites. Conversion-Tracking allows us to determine the success of the individual advertising actions. This allows us to fulfil our purpose of showing you advertisements that are of interest to you and to make our website of greater interest to you. The legal basis for the processing of your data is point (f) of Article 6(1) of the GDPR.

The advertising is provided by Google via so-called "Ad Servers". We use cookies for that purpose which allow measurement of certain parameters for success measurement, such as displaying advertisements or user clicks. If you arrive at our website via a Google advertisement, a Google Adword is saved on your PC. These cookies generally lose their validity after 30 days and are not intended to identify you personally. For this cookie, the Unique Cookie ID, Number of Ad Impressions per Placement (Frequency), the last impression (relevant for Post-View-Conversions) and Opt-Out Information (marking that the user does not want to be approached again) are generally saved as the analysis values.

These cookies allow Google to recognise your internet browser again. Provided that a user has visited certain pages of the website of an Adwords customer, and that the cookie saved on their computer has not expired, Google and the customer can detect that the user has clicked on the advertisement and was directed to that web page. A different cookie is allocated to each Adwords customer. Cookies cannot therefore be traced via the websites of Adwords customers. We, ourselves, do not gather and process person-related data in the stated advertising activities. We just receive statistical evaluations provided by Google. Based on these evaluations, we can detect which of the advertising actions used is particularly effective. Further data from the use of advertising is not obtained, and, in particular, we cannot identify users on the basis of this information.

The Marketing Tools used allow your browser automatically to create a direct connection to Google servers. We have no influence on the scope and other use of the data by Google and we provide information to the level of our knowledge: The incorporation of AdWords Conversion-Tracking allows

Google to receive information that you have called up a certain section of our internet presence or that you have clicked on one of our advertisements. Provided that you are registered with a Google service, Google can attribute the visit to your account. Even if you are not registered with Google, or if you have not logged yourself in, it is possible that the service provider could discover and save your IP address.

You can prevent storing of cookies by a setting on your browser software: we would point out, however, that in this case you may then not be able to use all the functions of this website to the full extent. In addition, you can prevent the gathering of data by cookies and your use of the website (including your IP address) by Google and the processing of this data by Google, by downloading and installing the browser plug-in available from the following link:

http://www.google.com/settings/ads/plugin

Google participates in the EU-US Privacy Shield, https://www.privacyshield.gov/EU-US-Framework.

Further information about Google data protection can be found here: http://www.google.com/intl/de/policies/privacy https://services.google.com/sitestats/de.html

Google Adwords Remarketing

We use Google Adwords Remarketing. This application allows you to see advertising from us on other websites after visiting ours. This is carried out by cookies saved on your browser through which your use behaviour when visiting various different websites can be gathered and evaluated by Google. This means that Google can detect your previously having visited our website. Amalgamation of the data gathered in the framework of remarketing with your personal data, that may be saved by Google, does not take place, according to Google's own statement. Pseudonymisation is used in particular in remarketing, according to Google.

Doubleclick by Google

We use Doubleclick, a service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter: "Google"). Doubleclick uses cookies to display your personalised advertising. The cookies do not contain any personal information.

The information generated by the cookie concerning your use is generally transmitted to a Google server in the USA and saved there. Google participates in the EU-US Privacy Shield, https://www.privacyshield.gov/EU-US-Framework. This thus gives an appropriate level of data protection even in exceptional cases where Google transfers person-related data to the USA.

The data gathered from your browser in the framework of Doubleclick is not amalgamated with other Google data.

You can prevent saving of cookies by appropriate setting of your browser software. You can deactivate the display of personalised advertising using a browser plug-in. You can install this here:

https://www.google.com/settings/ads/plugin

You can also deactivate here any personalised advertising.

The legal basis for the processing of data with the aid of Double Click is point (f) of Article 6(1) of the GDPR.

Further information about Google data protection can be found here: https://www.google.de/intl/de/policies/technologies/ads/

Facebook Pixel

Our website uses conversion measurement by visitor action pixel by Facebook, Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook").

This allows the behaviour of the site visitor to be tracked after they have clicked on a Facebook advertisement and been directed to the website of the service provider. This permits evaluation of the effectiveness of Facebook advertisements for statistical and market research purposes and allows optimisation of future advertising action.

The data gathered for us as the operator of the website is anonymous, we cannot make any conclusions about the identity of the user. The data is saved and processed by Facebook, however, so that a connection to the individual user profile is possible, and Facebook can use the data for their own advertising purposes, in accordance with the Facebook data usage directive. This allows Facebook to place advertisements on Facebook pages and outside of Facebook. This use of the data cannot be influenced by us, as a website operator.

More information about the protection of your private sphere is available in the Facebook data protection notes:

https://www.facebook.com/about/privacy/.

You can also deactivate the Remarketing Function "Custom Audiences" in the section on settings for advertisements at https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen. You need to be logged on to Facebook to do this.

If you do not have a Facebook account, you can deactivate the use-based Facebook advertising on the website of the European Interactive Digital Advertising Alliance: http://www.youronlinechoices.com/de/praferenzmanagement/.

Social Plugins

At present we use the following Social Media Plug-Ins: Facebook & Twitter. In this process, the person-related data is transferred to the individual plug-in service provider and stored there with the help of a button.

The individual plug-in service provider saves the data gathered about you as use profiles and uses them for purposes of advertising, market research and/or demand-oriented structuring of their website. Evaluation such as this is carried out particularly (also for users not logged in) for the display of demand-oriented advertising and to inform other users of the social network about your activities on our website. You have the right to countermand the creation of these user profiles and you need to refer to the individual plug-in service provider to exercise this right. The plug-ins allow us to offer you the opportunity of interacting with the social networks and other users so that we can improve our offer and structure ourselves in a more interesting way for you as the user. The legal basis for the use of plug-ins is point (f) of Article 6(1) of the GDPR.

Data forwarding takes place irrespective of whether you have an account with the plug-in service provider or not, and are logged in there. If you are logged in at the plug-in service provider, then your data gathered on our site is allocated directly to your account with the plug-in service provider. With US service providers, transfer is to the USA; they have subjected themselves to the EU-US Privacy Shield:

www.privacyshield.gov/EU-US-Framework

Further information about the purpose and scope of data gathering and its processing by the plug-in service provider is available in the following stated data protection declarations of these service providers. Here you can also obtain information about your rights and setting possibilities in this regard for the protection of your private sphere:

- Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA <u>www.facebook.com/policy.php</u>
- Twitter, Inc., 1355 Market St, Suite 900, San Francisco, California 94103, USA <u>twitter.com/privacy</u>

Incorporation of YouTube videos

We have incorporated YouTube videos in our online offer and these are saved at http://www.YouTube.com and can be played directly from our website. Visiting our website provides YouTube with the information that you have called up the relevant subpage on our website. In addition, log files are transferred. This takes place irrespective of whether YouTube provides a user account via which you are logged in or whether there is no user account. If you are logged in to Google, your data is directly allocated to your account. If you do not want allocation with your profile at YouTube, you need to log out before actuating the button. YouTube saves the data gathered about you as use profiles and uses them for purposes of advertising, market research and/or demand-oriented structuring of their website. Evaluation such as this is carried out particularly (even for users not logged in) for the creation of demand-oriented advertising and to inform other users of the social network about your activities on our website. You have the right to countermand the creation of these user profiles and you need to refer to YouTube to exercise this right.

Further information about the purpose and scope of data gathering and its processing by YouTube is available in the Google data protection declaration. Here you can also obtain information about your rights and setting possibilities for the protection of your private sphere: https://www.google.de/intl/de/policies/privacy.

Google also processes your personal data in the USA and has subjected itself to the EU-US Privacy Shield: <u>https://www.privacyshield.gov/EU-US-Framework</u>.

Further information about Google:

Google Inc., 1600 Amphitheater Parkway, Mountainview, California 94043, USA

Payment via Klarna

On our website you can pay using the payment service provider Klarna. This includes transferring the payment details to Klarna in order to process the payment. The legal basis for the processing of your data is point (f) of Article 6(1) of the GDPR.

Klarna gathers the information concerning the transaction and other information concerned with the transaction, such as goods/services, financial information, information about the interaction between

you and Klarna, dealer information, including details of the payment instruments, equipment-related information and location data.

Klarna uses the data, amongst other things, for payment processing, for solvency checks and for monitoring and improving their services.

Details of the data processing and purposes of processing can be seen in the Klarna data protection conditions:

https://cdn.klarna.com/1.0/shared/content/legal/terms/0/de_de/privacy

Klarna transmits your data to a series of third parties, including other companies in the Klarna Group, credit agencies, service providers and sub-contractors. Details of this can be seen in the Klarna data protection conditions:

https://cdn.klarna.com/1.0/shared/content/legal/terms/0/de_de/privacy

Further information about Klarna: Klarna Bank AB, Sveavägen 46, 111 34 Stockholm, Sweden

Immediate transfer

On our website we also offer payment by "Immediate Transfer". The provider of this payment service is Sofort GmbH, Theresienhöhe 12, 80339 Munich, Germany (hereinafter "Sofort GmbH"). With the aid of the "Immediate Transfer" process, we receive a payment confirmation in real-time from Sofort GmbH and can start immediately with the fulfilment of your requests.

If you decide to use the "Immediate Transfer" payment type, you transfer the PIN and a valid TAN to Sofort GmbH to allow them to log in to your online banking account. Sofort GmbH automatically checks your account balance upon logging in and carries out the transfer of funds to us using the TAN that you have provided. They then advise us without delay that a transaction has taken place. After logging in, they also automatically check your transactions, the credit framework of your available credit and the existence of additional accounts and their balances. In addition to the PIN and the TAN, the payment data you have entered and personal data is transferred to Sofort GmbH. The personal data covers your first name and surname, address, phone number(s), email address, IP address and possibly additional data required for payment processing. The transfer of this data is required to establish your identity without doubt and to prevent attempts at fraud.

The transfer of your data to Sofort GmbH is based on point (a) (consent) and/or point (b) (processing for the performance of a contract) of Article 6(1) of the GDPR. You have the opportunity of retracting your consent to data processing at any time. Retraction does not affect the effectiveness of data processing processes that occurred in the past.

Details about payment with immediate transfer can be taken from the following links: https://www.sofort.de/datenschutz.html and https://www.klarna.com/sofort/

Google Maps

Our website uses the services of Google Maps. This allows us to show you interactive maps directly on our website and allows you convenient use of the maps function. Use of Google Maps means that data is transferred to Google in the USA, including your IP address.

You can prevent the transfer of the data to Google by deactivating JavaScript in your browser settings. In this case you will not be able to use Google Maps on our website, however.

The legal basis for the processing of your data is point (f) of Article 6(1) of the GDPR. Google participates in the EU-US Privacy Shield: <u>www.privacyshield.gov/EU-US-Framework</u>

Information about Google: Google Inc., 1600 Amphitheater Parkway, Mountainview, California 94043, USA Further information about the conditions of use of Google: www.google.com/analytics/terms/de.html Further information about data protection at Google: www.google.com/intl/de/analytics/privacyoverview.html Further information about the conditions of use of Google Maps: www.google.com/intl/de US/help/terms maps.html

Duration of storage

We process and store your data only as long as is required for the processing or for the fulfilment of legal obligations. After the purpose of the processing expires, your data is blocked or deleted. If additional legal obligations exist for storage, then we block or delete your data when the legal storage deadlines expire.

Your rights

You have the following rights with respect to us concerning your personal data:

1) Right of information

You have the right to request confirmation as to whether we process your personal data. If this is the case, then you have the right of information about this personal data and other information, such as the purposes of the processing, the receiver and the planned duration of storage or the criteria for determination of the duration.

- 2) The right to correction and supplementation You have the right to request immediate correction of incorrect data. With consideration of the purposes of the processing, you have the right to request supplementation of incomplete data.
- 3) Right to delete ("The right to be forgotten") You have the right to deletion, provided that processing is not required. This is the case, for example, if your data is no longer required for the original purposes, if you have retracted your declaration of data protection consent or if the data is processed not in accordance with the law.
- Right to restriction of processing You have the right to restrict processing, e.g. if you are of the opinion that the personal data is incorrect.
- Right to data transferability You have the right to receive your personal data in a structured, current and machine-readable format.

6) Right of objection

You have the right, at any time, for reasons that arise from your special circumstances, to object to the processing of certain personal data.

In the case of direct advertising, you, as the person concerned, have the right, at any time, to object to the processing of your personal data for the purposes of advertising of that type; this applies also to profiling, provided that this is connected to direct advertising of that type.

7) Right to retraction of your data protection consent

You can, at any time, retract your consent to personal data processing for future effect. The legal correctness of the processing that has taken place up to the point of retraction is not affected by this.

In addition, you can, at any time, lodge a complaint with a data protection authority (contact data: Österreichische Datenschutzbehörde [Austrian Data Protection Authority], Wickenburggasse 8, 1080 Vienna, Austria; Tel: 0043 1 521 52-25 69; Email: <u>dsb@dsb.gv.at</u>), if, for example, you are of the opinion that the data processing is not in agreement with the data protection regulations.