

## **Privacy Policy of Berways Aviation UG (haftungsbeschränkt)**

We are very pleased about your interest in our company. Data protection has a particularly high priority for the management of Berways Aviation UG (haftungsbeschränkt). Berways Aviation UG (haftungsbeschränkt) is hereinafter referred to as the "Company".

The use of the company's website is generally possible without any indication of personal data. However, if a data subject wishes to use special services of our company via our website, processing of personal data may be necessary. If the processing of personal data is necessary and there is no legal basis for such processing, we generally obtain the consent of the data subject.

The processing of personal data, such as the name, address, e-mail address or telephone number of a data subject, is always carried out in accordance with the General Data Protection Regulation and in accordance with the regulations applicable to the company.

country-specific data protection regulations. By means of this privacy policy, our  
Inform the public about the type, scope and purpose of the personal data collected, used and processed by us. Furthermore, data subjects are informed about the rights to which they are entitled by means of this data protection declaration.

As the data controller, the company has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. Nevertheless, Internet-based data transmissions can generally have security gaps, so that absolute protection cannot be guaranteed. For this reason, every data subject is free to transmit personal data to us by alternative means, for example by telephone.

### **1. Definitions**

The company's privacy policy is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our privacy policy is intended to be easy to read and understand for the public as well as for our customers and business partners. To ensure this, we would like to explain the terms used in advance.

We use the following terms in this Privacy Policy, among others:

#### **a) personal data**

Personal data is all

Information relating to an identified or identifiable natural person (hereinafter "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### **b) Data Subject**

Data subject is any identified or identifiable natural person whose personal data is processed by the controller.

#### **c) Processing**

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, processing of personal data.

Disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

#### **d) Restriction of processing**

Restriction of processing is the marking of stored personal data with the aim of restricting their future processing.

#### **e) Profiling**

Profiling is any type of automated processing of personal data consisting in the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular to assess aspects relating to work performance, economic situation, analyze or predict the health, personal preferences, interests, reliability, behavior, location or movement of that natural person.

#### **f) Pseudonymization**

Pseudonymisation is the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the

use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data is not attributed to an identified or identifiable natural person become.

g) Controller or controller

The controller or controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its designation may be provided for by Union or Member State law.

h) Processor

Processor means a natural or legal person, public authority, agency or other body that processes personal data on behalf of the controller.

i) Receiver

The recipient is a natural or legal person, public authority, agency or other body to which personal data is disclosed, whether or not it is a third party. Authorities which, in the context of a specific investigative mandate under the Union law or the law of the Member States, but are not considered recipients.

j) Third

Third party means a natural or legal person, public authority, agency or other body other than the data subject, the controller, the processor and the persons who, under the direct authority of the controller or the processor, are authorised to process the personal data.

k) Consent

Consent is any freely given, specific, informed and unambiguous indication of the data subject's wishes, in the form of a statement or other clear affirmative action, by which the data subject signifies that he or she agrees to the processing of personal data concerning him or her.

## 2. Name and address of the person responsible for the Controller

The controller within the meaning of the General Data Protection Regulation, other data protection

laws applicable in the member states of the European Union and other provisions of a data protection nature is:

Berways Aviation UG (haftungsbeschränkt)  
8, 10827 Berlin, Germany  
E-mail: fly@berways.com  
Website: www.berways.com

## 3. Cookies

The company's websites use cookies. Cookies are text files that are stored on a computer system via an internet browser.

Many websites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a string of characters through which websites and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows the websites and servers visited to distinguish the individual browser of the data subject from other Internet browsers that contain other cookies. A particular internet browser can be recognized and identified via the unique cookie ID.

Through the use of cookies, the company can use the To provide users of this website with more user-friendly services that would not be possible without the setting of cookies.

A cookie can be used to optimise the information and offers on our website in the interests of the user. As mentioned above, cookies allow us to recognise the users of our website. The purpose of this

Recognition is to make it easier for users to use our website. For example, the user of a website that uses cookies does not have to re-enter their login details each time they visit the website, because this is done by the website and the cookie stored on the user's computer system. Another example is the cookie of a shopping cart in the online shop. The online shop remembers the items that a customer has placed in the virtual shopping cart via a cookie.

The data subject can prevent the setting of cookies by our website at any time by means of an appropriate setting of the Internet browser used and thus permanently object to the setting of cookies. Furthermore, cookies that have already been set can be deleted at any time via an Internet browser or other software programs. This is possible in all common Internet browsers. If the data subject

deactivates the setting of cookies in the Internet browser used, not all functions of our website may be fully usable.

#### **4. Collection of general data and information**

The Company's website collects a series of general data and information each time a data subject or automated system accesses the website. This general data and information is stored in the log files of the server. The following can be recorded: (1) browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites that are accessed via an accessing system on our website, (5) the date and time of access to the website, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) other similar data and information provided to the

To avert danger in the event of attacks on our information technology systems.

When using this general data and information, the Company does not draw any conclusions about the data subject. Rather, this information is required in order to (1) deliver the content of our website correctly, (2) to optimise the content of our website and the advertising for it, (3) to ensure the long-term functionality of our information technology systems and the technology of our website, and (4) to provide law enforcement authorities with the information necessary for criminal prosecution in the event of a cyber attack. This anonymously collected data and information is therefore evaluated by the company on the one hand statistically and on the other hand with the aim of increasing data protection and data security in our company in order to ultimately ensure an optimal level of protection for the personal data processed by us. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

#### **5. Registration on our website**

The data subject has the option of registering on the Controller's website by providing personal data. The personal data that is transmitted to the controller can be found in the respective input mask used for registration. The personal data entered by the data subject will be collected and stored exclusively for internal use by the controller and for its own

purposes. The controller may arrange for the transfer to one or more processors, such as a parcel service provider, who will also use the personal data exclusively for internal use attributable to the controller.

By registering on the website of the controller, the IP address assigned by the Internet service provider (ISP) to the data subject, the date and time of registration is also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services and, if necessary, to make it possible to solve crimes that have been committed. In this respect, the storage of this data is necessary to protect the controller. As a matter of principle, this data will not be passed on to third parties unless there is a legal obligation to pass it on or if the disclosure serves the purpose of criminal prosecution.

The registration of the data subject with voluntary provision of personal data serves the purpose of processing

to offer the data subject content or services which, due to the nature of the matter, are only registered users.

Registered persons are free to change the personal data provided during registration at any time or to have them completely deleted from the data of the controller.

The controller shall at any time provide each data subject with the right to

Request information about what personal data is stored about the data subject. In addition, the data controller responsible for the processing shall correct or delete

Responsible personal data at the request or notification of the data subject, insofar as this is not required by law.

retention obligations. All the employees of the controller are available to the data subject as contact persons in this context.

#### **6. Subscription to our newsletter**

On the company's website, users are given the opportunity to subscribe to our company's newsletter. The personal data that is transmitted to the controller when subscribing to the newsletter is determined by the information used for this purpose Form.

The company informs its customers and business partners at regular intervals by means of a

Newsletters about offers of the company. In principle, the data subject can only receive our company's newsletter if (1) the data subject has a valid e-mail address and (2) the data subject opts in to the

newsletter dispatch. For legal reasons, a confirmation email will be sent to the e-mail address entered by a data subject for the first time for the newsletter dispatch in a double opt-in procedure. This confirmation e-mail serves to check whether the owner of the e-mail address has authorised the receipt of the newsletter as a data subject.

When registering for the newsletter, we also store the IP address assigned by the Internet Service Provider (ISP) of the computer system used by the data subject at the time of registration, as well as the date and time of registration. The collection of this data is necessary in order to be able to trace the (possible) misuse of the e-mail address of a data subject at a later date and therefore serves to provide legal protection for the controller.

The personal data collected in the context of registering for the newsletter will be used exclusively for sending our newsletter. Furthermore, subscribers to the newsletter could be informed by e-mail if this is necessary for the operation of the newsletter service or a corresponding registration, as could be the case in the event of changes to the newsletter offer or changes in the technical conditions. The personal data collected in the context of the newsletter service will not be passed on to third parties. The subscription to our newsletter can be cancelled by the data subject at any time. The consent to the storage of personal data that the data subject has given us for the purpose of sending the newsletter can be revoked at any time. For the purpose of revoking consent, a corresponding link can be found in each newsletter. Furthermore, it is possible to unsubscribe from the newsletter at any time directly on the website of the controller or to inform the controller of this in another way.

## **7. Newsletter tracking**

The company's newsletters contain so-called tracking pixels. A web beacon is a thumbnail graphic that is embedded in such e-mails, which are sent in HTML format, to enable log file recording and log file analysis. This allows a statistical evaluation of the success or failure of online marketing campaigns to be carried out. The embedded tracking pixel allows

the company to see if and when an email has been opened by a data subject and which links in the email have been accessed by the data subject.

Such personal data collected via the tracking pixels contained in the newsletters will be stored and evaluated by the controller in order to optimise the newsletter dispatch and to adapt the content of future newsletters even better to the interests of the data subject.

This personal data will not be passed on to third parties. Data subjects are entitled at any time to revoke the separate declaration of consent in this regard submitted via the double opt-in procedure. After a revocation, this personal data will be deleted by the controller. The company automatically interprets unsubscribing from receiving the newsletter as Revocation.

## **8. Contact via the website**

Due to legal regulations, the company's website contains information that enables quick electronic contact with our company as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject will be automatically stored. Such personal data provided on a voluntary basis by a data subject to the controller will be stored for the purposes of processing or contacting the data subject. This personal data will not be passed on to third parties.

## **9. Routine deletion and blocking of personal data**

The controller processes and stores personal data of the data subject only for the period necessary to achieve the

is necessary for the purpose of storage or if this has been provided for by the European legislator or another legislator in laws or regulations to which the controller is subject.

If the purpose of storage no longer applies, or if a regulation prescribed by the European legislator or another competent legislator is

storage period, the personal data will be routinely blocked or deleted in accordance with the legal regulations.

## 10. Rights of the data subject

### a) Right to confirmation

Each data subject must comply with the legislator to request confirmation from the controller as to whether personal data concerning him or her is being processed. If a data subject wishes to exercise this right of confirmation, he or she may contact an employee of the controller at any time.

### b) Right to information

Every person affected by the processing of personal data has the right to do so under the European Directive and legislator to withdraw at any time from the authority responsible for the processing of To obtain information free of charge about the personal data stored about him or her and a copy of this information. Furthermore, the European Directive and The legislature granted the data subject information on the following information:

the purposes of processing

the categories of personal data that are processed

the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular in the case of recipients in third countries or international organisations

if possible, the envisaged period for which the personal data will be stored or, if this is not possible, the criteria for determining this duration

the existence of a right to rectification or erasure of personal data concerning them, or to Restriction of processing by the controller or a right to object to such processing

the existence of a right of appeal to a supervisory authority

if the personal data is not collected from the data subject: all available information about the origin of the data

the existence of an automated Decision-making, including profiling, in accordance with Article 22 (1) and (4) GDPR and, at least in these cases, meaningful information about the logic involved as well as the scope and intended effects of such processing for the data subject

Furthermore, the person concerned is entitled to The right to know whether personal data has been transferred to a third country or to an international organisation. If this is the case, the data subject shall also have the right to obtain information on the appropriate safeguards in connection with the transfer.

If a data subject wishes to exercise this right of access, he or she may contact an employee of the controller at any time.

### c) Right to rectification

Every person affected by the processing of personal data has the right granted by the European legislator to request the rectification of inaccurate personal data concerning him or her without undue delay. Furthermore, the data subject has the right to take into account the purposes of the processing, to request the completion of incomplete personal data, including by means of a supplementary statement.

If a data subject wishes to exercise this right of rectification, he or she may contact an employee of the controller at any time.

### d) Right to erasure (right to be forgotten)

Every data subject to the processing of personal data has the right, granted by the European legislator for directives and regulations, to obtain from the controller the erasure of personal data concerning him or her without undue delay, provided that one of the following grounds applies and in so far as the processing is not necessary:

The personal data has been collected or otherwise processed for purposes for which it is no longer necessary.

The data subject withdraws his/her consent on which the processing was based pursuant to Art. 6 (1) (a) GDPR or Art. 9 (2) (a) GDPR and there is no other reason to Legal Basis for Processing.

The data subject objects to the processing in accordance with Art. 21 (1) GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing in accordance with Art. 21 (2) GDPR.

The personal data has been processed unlawfully.



The erasure of the personal data is necessary for compliance with a legal obligation under Union law or the law of the Member States to which the controller is subject.

The personal data was collected in relation to information society services offered in accordance with Art. 8 para. 1 GDPR.

If one of the above reasons applies and a data subject wishes to request the deletion of personal data stored by the Company, he or she may contact an employee of the controller at any time. The employee of the company will arrange for the deletion request to be complied with immediately. If the personal data has been made public by the Company and our Company, as the controller, is obliged to delete the personal data in accordance with Article 17 (1) of the GDPR, the Company shall take appropriate measures, including technical measures, taking into account the available technology and the costs of implementation, in order to protect other data controllers who process the published personal data, inform the data subject that the data subject has requested from those other data controllers the deletion of all links to, or copies or replications of, such personal data, to the extent that the processing is not necessary. The employee of the company will arrange the necessary measures in individual cases.

#### e) Right to restriction of processing

Every person affected by the processing of personal data has the right to do so under the European Directive and legislature to demand that the controller restrict the processing if one of the following conditions is met:

The accuracy of the personal data is contested by the data subject for a period of time that allows the controller to verify the accuracy of the personal data.

The processing is unlawful, the data subject opposes the erasure of the personal data and instead requests the restriction of the use of the personal data.

The controller no longer needs the personal data for the purposes of the processing, but the data subject needs it for the establishment, exercise or defence of legal claims.

The data subject has objected to the processing pursuant to Art. 21 (1) GDPR and it is not yet clear whether the legitimate reasons of the controller outweigh those of the data subject.

If one of the above conditions is met and a data subject wishes to request the restriction of personal data stored by the Company, he or she may contact an employee of the controller at any time. The employee of the company will arrange for the processing to be restricted.

#### f) Right to data portability

Every person affected by the processing of personal data has the right to do so under the European Directive and

The legislature granted the legislature the right to receive the personal data concerning him/her, which have been provided by the data subject to a controller, in a structured, commonly used and machine-readable format. It also has the right to transmit such data to another controller without hindrance from the controller to whom the personal data has been provided, provided that the

Processing is based on consent pursuant to Art. 6 (1) (a) GDPR or Art. 9 (2) (a) GDPR or on a contract pursuant to Art. 6 (1) (b) GDPR and the processing is carried out by automated means, provided that the processing is not necessary for the performance of a task carried out in the public sphere interest or in the exercise of official authority vested in the Controller.

Furthermore, when exercising his or her right to data portability in accordance with Art. 20 (1) GDPR, the data subject has the right to obtain that the personal data be transferred directly from one controller to another controller, insofar as this is technically feasible and provided that this does not adversely affect the rights and freedoms of other persons. In order to assert the right to data portability, the data subject may contact an employee of the company at any time.

#### g) Right to object

Every person affected by the processing of personal data has the right granted by the European legislature to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her on the basis of Article 6(1)(e) or (f) of the GDPR. This

shall also apply to an application based on these provisions.

Profiling.

The Company will no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or the processing serves to establish, exercise or defend legal claims.

If the Company processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data for such marketing. This also applies to profiling, insofar as it is related to such direct advertising.

If the data subject objects to the company to the processing for the purposes of direct marketing, the company will no longer process the personal data for these purposes.

In addition, the data subject has the right to object, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her carried out by the company for scientific or historical research purposes or for statistical purposes pursuant to Art. 89 (1) GDPR, unless such processing is necessary for the performance of a task carried out in the public interest.

To exercise the right to object, the data subject may contact any employee of the company or any other employee directly. The data subject is also free to use the services of the

Information society, notwithstanding Directive 2002/58/EC, to exercise its right of opposition by means of automated procedures using technical specifications.

h) Automated decision-making in the Individual case including profiling

Every data subject to the processing of personal data has the right, granted by the European legislature, not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him/her, provided that the decision (1) does not apply to the conclusion or performance of a contract between the data subject person and the controller, or (2) by virtue of Union or Member State legislation to which the controller, is permissible and that such legislation contains appropriate measures to safeguard the rights and freedoms and legitimate interests of the

data subject, or (3) is carried out with the explicit consent of the data subject.

If the decision (1) is necessary for the conclusion or performance of a contract between the data subject and the controller, or (2) it is made with the explicit consent of the data subject, the company shall take appropriate measures to safeguard the rights and freedoms and legitimate interests of the data subject, including at least the right to obtain the intervention of a person from the controller, to present its own position and to contest the decision.

If the data subject wishes to exercise rights relating to automated decision-making, he or she may contact an employee of the controller at any time.

i) Right to revoke a consent under data protection law

Every person affected by the processing of personal data has the right granted by the European legislator to withdraw consent to the processing of personal data at any time.

If the data subject wishes to exercise his or her right to withdraw consent, he or she may contact an employee of the controller at any time.

## **11. Data protection for applications and in the application process**

The controller collects and processes the personal data of applicants for the purpose of processing the application process. Processing may also be carried out by electronic means. This is particularly the case if an applicant submits corresponding application documents on the electronically, for example by e-mail or via a web form located on the website.

If the controller concludes an employment contract with an applicant, the transmitted data will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions. Is used by the processor responsible for processing

If the controller has not concluded an employment contract with the applicant, the application documents will be automatically deleted two months after the rejection decision has been announced, provided that deletion does not conflict with any other legitimate interests of the controller. Other legitimate interest in this sense is, for

example, a burden of proof in proceedings under the General Equal Treatment Act (AGG).

## **12. Data protection provisions on the use and use of Facebook**

The controller has integrated components of the company Facebook on this website. Facebook is a social network.

A social network is a social meeting place operated on the Internet, an online community that usually allows users to communicate with each other and interact in virtual space. A social network can serve as a platform for the exchange of opinions and experiences or allows the

Internet community, personal or business-related information. Facebook allows users of the social network to create private profiles, upload photos and network via friend requests, among other things.

Facebook is operated by Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, USA. If a data subject lives outside the USA or Canada, the controller of personal data is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

Each time one of the individual pages of this website, which is operated by the controller and on which a Facebook component (Facebook plug-in) has been integrated, the Internet browser on the information technology system of the data subject is automatically prompted by the respective Facebook component to download a representation of the corresponding Facebook component from Facebook. A complete overview of all Facebook plug-ins can be found at

<https://developers.facebook.com/docs/plugins/> can be retrieved. As part of this technical procedure, Facebook receives information about which specific subpage of our website is visited by the data subject.

If the data subject is logged in to Facebook at the same time, Facebook recognises which specific subpage of our website the data subject is visiting every time the data subject accesses our website and for the entire duration of the respective stay on our website. This information is collected by the Facebook component and assigned by Facebook to the respective Facebook account of the data subject. If the data subject presses one of the Facebook buttons integrated on our website, such as the

"Like" button, or if the data subject submits a comment, Facebook assigns this information to the personal Facebook user account of the data subject and stores this personal data.

Facebook always receives information via the Facebook component that the data subject has visited our website if the data subject is logged in to Facebook at the same time as accessing our website; this takes place regardless of whether the data subject clicks on the Facebook component or not. If the data subject does not want this information to be transmitted to Facebook in this way, he or she can prevent the transfer by logging out of his or her Facebook account before accessing our website.

Facebook's published data policy, which can be accessed at <https://facebook.com/about/privacy/>, provides information on the collection, processing and use of personal data by Facebook. It also explains which setting options Facebook offers to protect the privacy of the data subject. In addition, various applications are available that make it possible to suppress data transmission to Facebook. Such applications may be used by the affected person to suppress data transmission to Facebook.

## **13. Privacy Policy on the Use and Use of Google AdSense**

The controller has integrated Google AdSense on this website. Google AdSense is an online service that enables advertising to be placed on third-party sites. Google AdSense is based on a Algorithm that selects the advertisements displayed on third-party sites to match the content of the respective third-party site. Google AdSense allows interest-based targeting of the Internet user, which is implemented by generating individual user profiles.

The operating company of the Google AdSense component is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

The purpose of the Google AdSense component is the integration of advertisements on our website. Google AdSense places a cookie on the data subject's information technology system. What cookies are has already been explained above. By setting the cookie, Alphabet Inc. is enabled to analyze the use of our website. Each time one of the individual pages of this website, which is operated by the controller and on which a Google AdSense component has been integrated, the



Internet browser on the information technology system of the data subject is automatically caused by the respective Google AdSense component to transmit data to Alphabet Inc. for the purpose of online advertising and the settlement of commissions. As part of this technical process, Alphabet Inc. becomes aware of personal data, such as the IP address of the data subject, which Alphabet Inc. uses, among other things, to trace the origin of visitors and clicks and subsequently to enable commission settlements.

The data subject can prevent the setting of cookies by our website, as already described above, at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Such a setting of the Internet browser used would also prevent Alphabet Inc. from placing a cookie on the information technology system of the data subject. In addition, a cookie already set by Alphabet Inc. can be deleted at any time via the Internet browser or other software programs.

Google AdSense also uses so-called tracking pixels. A tracking pixel is a thumbnail graphic that is embedded in Internet pages to enable log file recording and log file analysis, whereby a statistical evaluation can be carried out. Based on the embedded tracking pixel, Alphabet Inc. can recognize whether and when a website has been opened by a data subject and which links have been clicked by the data subject. Tracking pixels are used, among other things, to evaluate the flow of visitors to a website.

Through Google AdSense, personal data and information, which also includes the IP address and is used to record and bill the displayed data.

Advertisements are necessary to be transmitted to Alphabet Inc. in the United States of America. This personal data is stored and processed in the United States of America. Alphabet Inc. may share this personal information collected through the technical process with third parties.

Google AdSense is <https://www.google.de/intl/de/adsense/start/> explained in more detail under this link.

#### **14. Data protection provisions on use and Use of Google Analytics (with anonymization function)**

The Controller has integrated the Google Analytics component (with anonymization function) on this website. Google

Analytics is a web analytics service. Web analysis is the collection, collection and evaluation of data about the behavior of

Visitors to websites. A web analysis service collects, among other things, data on the website from which a data subject has come to a website (so-called referrers), which subpages of the website have been accessed or how often and for how long a subpage has been viewed. A web analysis is mainly used to optimize a website and for the cost-benefit analysis of Internet advertising.

The operating company of the Google Analytics component is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

The controller uses the addition "\_gat.\_anonymizeIp" for web analysis via Google Analytics. By means of this addition, the IP address of the data subject's Internet connection will be shortened and anonymized by Google if our website is accessed from a member state of the European Union or from another contracting state of the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse the flow of visitors to our website. Google uses the data and information obtained, among other things, to evaluate the use of our website, to compile online reports for us that show the activities on our website, and to provide other services related to the use of our website.

Google Analytics places a cookie on the data subject's information technology system. What cookies are has already been explained above. By setting the cookie, Google is enabled to analyse the use of our website. Each time one of the individual pages of this website, which is operated by the controller and on which a Google Analytics component has been integrated, the

Internet browser on the information technology system of the data subject is automatically prompted by the respective Google Analytics component to transmit data to Google for the purpose of online analysis. As part of this technical process, Google becomes aware of personal data, such as the IP address of the data subject, which

Google uses, among other things, to trace the origin of visitors and clicks and subsequently commission settlements.

The cookie is used to store personal information, such as the access time, the location from which access originated and the frequency of visits to our website by the data subject. Each time you visit our website, this personal data, including the IP address of the Internet connection used by the data subject, is transmitted to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may pass on this personal data collected via the technical process to third parties.

The data subject can prevent the setting of cookies by our website, as already described above, at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Such a setting of the Internet browser used would also prevent Google from placing a cookie on the data subject's information technology system. In addition, a cookie already set by Google Analytics can be deleted at any time via the internet browser or other software programs.

Furthermore, the data subject has the option of opting in to the collection of data collected by Google Analytics, as well as the processing of this data by Google. To do this, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> download and install. This browser add-on informs Google Analytics via JavaScript that no data and information about visits to websites may be transmitted to Google Analytics. The installation of the BrowserAdd-on is considered a contradiction by Google. If the data subject's information technology system is deleted, formatted or reinstalled at a later date, the data subject must reinstall the browser add-on in order to deactivate Google Analytics. If the browser add-on is uninstalled or deactivated by the data subject or another person who is attributable to his or her sphere of influence, there is the possibility of reinstalling or reactivating the browser add-on.

For more information and Google's applicable privacy policy, please visit <https://www.google.de/intl/de/policies/privacy/> and under

<http://www.google.com/analytics/terms/de.html>. Google Analytics is published at this link [https://www.google.com/intl/de\\_de/analytics/](https://www.google.com/intl/de_de/analytics/) explained in more detail.

## **15. Privacy Policy on the Use and Use of Google Remarketing**

The controller has integrated Google Remarketing services on this website. Google Remarketing is a feature of Google AdWords that allows a company to display ads to Internet users who have previously appeared on the website.

company. The

Integration of Google Remarketing therefore allows a company to create user-related advertising and consequently display interest-relevant advertisements to the Internet user.

The operating company of the services of Google Remarketing is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

The purpose of Google Remarketing is to display interest-relevant advertising. Google Remarketing enables us to display advertisements via the Google advertising network or to have them displayed on other websites that are tailored to the individual needs and interests of Internet users.

Google Remarketing places a cookie on the data subject's information technology system. What cookies are has already been explained above. By setting the cookie, Google will be able to recognize the visitor to our website if he or she subsequently accesses websites that are also members of the Google advertising network. With every visit to a website on which the Google Remarketing service has been integrated, the Internet browser of the data subject automatically identifies itself to Google. As part of this technical process, Google becomes aware of personal data, such as the user's IP address or surfing behaviour, which Google uses to display interest-relevant advertising, among other things.

The cookie is used to store personal information, such as the websites visited by the data subject. Every time you visit our website, personal data, including the IP address of the Internet connection used by the data subject, is transmitted to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may pass on this personal data collected via the technical process to third parties.

The data subject can prevent the setting of cookies by our website, as already described above, at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Such a setting of the Internet browser used would also prevent Google places a cookie on the data subject's information technology system. In addition, a cookie already set by Google Analytics can be deleted at any time via the internet browser or other software programs.

Furthermore, the data subject has the option of objecting to interest-based advertising by Google. To do this, the data subject must call up the link [www.google.de/settings/ads](https://www.google.de/settings/ads) from each of the Internet browsers used by him or her and make the desired settings there.

For more information and Google's applicable privacy policy, please visit <https://www.google.de/intl/de/policies/privacy/> be retrieved.

#### **16. Data protection provisions on the use and use of Google AdWords**

The controller has integrated Google AdWords on this website. Google AdWords is an internet advertising service that allows advertisers to place ads in Google's search engine results as well as in the Google advertising network. Google AdWords allows an advertiser to pre-define certain keywords that will only be used to display an ad in Google's search engine results when the user uses the search engine to retrieve a keyword-relevant search result. In the Google advertising network, the ads are distributed by means of an automatic algorithm and in compliance with the previously defined keywords on topic-relevant websites.

The operating company of the services of Google AdWords is Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

The purpose of Google AdWords is to advertise our website by displaying interest-relevant advertising on the websites of third-party companies and in the search engine results of the Google search engine and the display of third-party advertising on our website.

If a data subject reaches our website via a Google ad, a so-called conversion cookie is stored on the data subject's information technology system by Google. What cookies are has already been explained above.

A conversion cookie loses its validity after thirty days and is not used to identify the data subject. If the cookie has not yet expired, the conversion cookie is used to track whether certain subpages, such as the shopping cart from an online shop system, have been accessed on our website. The conversion cookie allows both us and Google to track whether a data subject who has reached our website via an AdWords ad has generated sales, i.e. has completed or cancelled a purchase of goods.

The data and information collected through the use of the conversion cookie are used by Google to compile visit statistics for our website. These visit statistics are used by us to determine the total number of users who have been referred to us via AdWords ads, i.e. to determine the success or failure of the respective AdWords ad and to optimize our AdWords ads for the future. Neither our company nor other Google AdWords advertisers receive information from Google that could be used to identify the data subject.

The conversion cookie is used to store personal information, such as the websites visited by the data subject. Every time you visit our website, personal data, including the IP address of the Internet connection used by the data subject, is transmitted to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may pass on this personal data collected via the technical process to third parties.

The data subject can prevent the setting of cookies by our website, as already described above, at any time by means of a corresponding setting of the Internet browser used and thus permanently object to the setting of cookies. Such a setting of the Internet browser used would also prevent Google from setting a conversion cookie on the data subject's information technology system. In addition, a cookie already set by Google AdWords can be deleted at any time via the Internet browser or other software programs.

Furthermore, the data subject has the option of objecting to interest-based advertising by Google. To do this, the data subject must call up the link [www.google.de/settings/ads](https://www.google.de/settings/ads) from each of the Internet browsers used by him or her and make the desired settings there.

For more information and Google's applicable privacy policy, please visit <https://www.google.de/intl/de/policies/privacy/> be retrieved.

#### **17. Privacy Policy on the Use and Use of Instagram**

The controller has integrated components of the Instagram service on this website. Instagram is a service that qualifies as an audiovisual platform and allows users to share photos and videos and also allows such data to be disseminated on other social networks.

The operating company of Instagram's services is Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland.

Each time one of the individual pages of this website, which is operated by the controller and on which an Instagram component (Insta button) has been integrated, the

Internet browser on the data subject's information technology system is automatically prompted by the respective Instagram component to download a representation of the corresponding component from Instagram. As part of this technical procedure, Instagram receives information about which specific subpage of our website is visited by the data subject.

If the data subject is logged in to Instagram at the same time, Instagram recognises which specific subpage the data subject is visiting every time the data subject accesses our website and for the entire duration of the respective stay on our website. This information is collected by the Instagram component and assigned by Instagram to the respective Instagram account of the data subject. If the data subject clicks on one of the Instagram buttons integrated on our website, the data and information transmitted with it will be assigned to the personal Instagram user account of the data subject and stored and processed by Instagram.

Instagram always receives information via the Instagram component that the data subject has visited our website if the data subject is logged in to Instagram at the same time as the data subject is accessed from our website; this takes place regardless of whether the data subject clicks on the Instagram component or not. If the data subject does not want this information to be transmitted to Instagram in this way, the data subject can prevent the transmission by logging out of their Instagram account before accessing our website.

Further information and Instagram's applicable privacy policy can be found at <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/> be called up.

#### **18. Privacy Policy on the Use and Use of LinkedIn**

The controller has integrated components of LinkedIn Corporation on this website. LinkedIn is an internet-based social network that offers a Enables users to connect with existing business contacts as well as to make new business contacts. Over 400 million registered people use LinkedIn in more than 200 countries. This makes LinkedIn currently the largest platform for business contacts and one of the most visited websites in the world.

LinkedIn's operating company is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, USA. LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible for data protection matters outside the United States.

With every single call up of our website equipped with a LinkedIn component (LinkedIn plug-in), this component causes the browser used by the data subject to download a corresponding representation of the LinkedIn component. Further information on the LinkedIn plug-ins can be found at <https://developer.linkedin.com/plugins> Retrieve. As part of this technical procedure, LinkedIn receives information about which specific subpage of our website is visited by the data subject.

If the data subject is logged in to LinkedIn at the same time, LinkedIn recognises which specific subpage of our website the data subject is visiting every time the data subject accesses our website and for the entire duration of the respective stay on our website. This information is collected by the LinkedIn component and assigned by LinkedIn to the respective LinkedIn account of the data subject. If the data subject clicks a LinkedIn button integrated into our website, LinkedIn assigns this information to the personal LinkedIn user account of the data subject and stores this personal data.

LinkedIn always receives information via the LinkedIn component that the data subject has visited our website if the data subject is logged in to LinkedIn at the same time as accessing our website;

this takes place regardless of whether the data subject clicks on the LinkedIn component or not. If the data subject does not want this information to be transmitted to LinkedIn in this way, the data subject can prevent the transmission by logging out of his LinkedIn account before accessing our website.

LinkedIn offers, among <https://www.linkedin.com/psettings/guestcontrols>, the option of unsubscribing from e-mail messages, SMS messages and targeted ads, as well as managing ad settings. LinkedIn also uses partners such as Quantcast, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua and Lotame that may set cookies. Such cookies can be used at <https://www.linkedin.com/legal/cookie-policy> be rejected. The applicable LinkedIn's privacy policy is under <https://www.linkedin.com/legal/privacypolicy> available. The Cookie Policy of LinkedIn is available at <https://www.linkedin.com/legal/cookie-policy> available.

#### **19. Data protection provisions on the use and use of YouTube**

The controller has integrated components from YouTube on this website. YouTube is an Internet video portal that allows video publishers to post video clips free of charge and other users to view, rate and comment on them free of charge. YouTube allows the publication of all kinds of videos, which is why both complete film and TV shows, but also music videos, trailers or videos made by users themselves can be accessed via the Internet portal.

YouTube is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin, D04 E5W5, Ireland.

Each time one of the individual pages of this website, which is operated by the controller and on which a YouTube component (YouTube video) has been integrated, the Internet browser on the data subject's information technology system is automatically prompted by the respective YouTube component to download a representation of the corresponding YouTube component from YouTube. For more information about YouTube, click here

under

<https://www.youtube.com/yt/about/>

Retrieve. As part of this technical procedure, YouTube and Google receive information about which specific subpage of our website is visited by the data subject.

If the data subject is logged in to YouTube at the same time, YouTube recognises which specific subpage of our website the data subject is visiting when a subpage containing a YouTube video is accessed. This information is collected by YouTube and Google and assigned to the respective YouTube account of the data subject.

YouTube and Google will always receive information via the YouTube component that the data subject has visited our website if the data subject is logged in to YouTube at the same time as accessing our website; this takes place regardless of whether the data subject clicks on a YouTube video or not. If the data subject does not want this information to be transmitted to YouTube and Google in this way, he or she can use the transmission by logging out of her YouTube account before accessing our website.

The privacy policy published by YouTube, which can be accessed at <https://www.google.de/intl/de/policies/privacy/>, provides information about the collection, processing and use of personal data by YouTube and Google.

#### **22. Legal basis for processing**

Art. 6 I lit. a GDPR serves our company as the legal basis for processing operations in which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is a party, as is the case, for example, in the case of processing operations that are necessary for the supply of goods or the provision of any other service or consideration, the processing is based on Art. 6 I lit. b GDPR. The same applies to such processing operations that are necessary to carry out pre-contractual measures, such as in cases of enquiries about our products or services. If our company is subject to a legal obligation that requires the processing of personal data, such as for the fulfilment of tax obligations, the processing is based on Art. 6 I lit. c GDPR. In rare cases, the processing of personal data may become necessary to protect the vital interests of the data subject or of another



natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, a hospital or other third parties. In this case, the processing would be based on Art. 6 I lit. d GDPR. Ultimately, processing operations are based on Art. 6 I lit. f GDPR. Processing operations that are not covered by any of the aforementioned legal bases are based on this legal basis if the processing is necessary to safeguard a legitimate interest of our company or of a third party, provided that the interests, fundamental rights and freedoms of the data subject do not prevail. We are permitted to carry out such processing operations in particular because they have been specifically mentioned by the European legislator. In this respect, it took the view that a legitimate interest could be assumed if the data subject is a customer of the controller (recital 47 sentence 2 GDPR).

### **23. Legitimate interests in the processing pursued by the Controller or a third party**

If the processing of personal data is based on Article 6 I lit. f GDPR, our legitimate interest is the conduct of our business activities for the benefit of all our employees and our shareholders.

### **24. Duration for which the personal data is stored**

The criterion for the duration of the storage of personal data is the respective statutory retention period. After the expiry of the period, the corresponding data will be routinely deleted, provided that they are no longer required for the performance of the contract or the initiation of a contract.

### **25. Legal or contractual requirements for the provision of personal data; Necessity for the conclusion of the contract; Obligation of the data subject to provide the personal data; possible consequences of not providing**

We would like to inform you that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual regulations (e.g. information on the contractual partner). In some cases, it may be necessary for a data subject to provide us with personal data that must subsequently be processed by us. For example, the data subject is obliged to provide us with

personal data if our company enters into a contract with him/her. Failure to provide the personal data would mean that the contract with the person concerned could not be concluded. Before providing personal data by the data subject, the data subject must contact one of our employees. Our employee clarifies the

Data subjects on a case-by-case basis as to whether the provision of personal data is required by law or contract or is necessary for the conclusion of a contract, whether there is an obligation to provide the personal data and what the consequences of not providing the personal data would be.

### **26. Google reCaptcha**

We use Google's reCaptcha service to determine whether a human or computer makes a specific input in our contact or newsletter form. Google uses the following data to check whether you are a human or a computer: IP address of the device used, the website you visit on our website and on which the captcha is integrated, the date and duration of the visit, the identification data of the browser and operating system type used, Google account if you are logged in to Google, mouse movements on the reCaptcha surfaces and tasks, where you have to identify images. The legal basis for the described data processing is Article 6 (1) (f) of the General Data Protection Regulation. There is a legitimate interest on our part in this data processing, to ensure the security of our website and to protect ourselves from automated inputs (attacks).

### **27. Data Processing for Flight Operations**

Berways is entitled to collect, process and use personal data in the context of the performance of the contract under the conditions of the Federal Data Protection Act and other statutory provisions. This data is collected, processed, used and transmitted within the scope of the subject matter of the contract via data processing systems. This processing or use is carried out within the framework of the legal provisions for the following purposes: making reservations, purchasing a flight ticket, purchasing additional services and processing payment transactions; Preparation and provision of services, facilitation of entry and customs

procedures. For this purpose, Berways is entitled to collect, store, modify, block, delete, use and transmit this data to its own offices, authorised representatives and those who provide the above-mentioned services on behalf of Berways.

**28. Existence of automated decision-making**

As a responsible company we refrain from automatic decision-making or profiling.