# **GuestTek Privacy Policy**

GuestTek takes information security very seriously and attaches great importance to the protection of your personal data. That's why we respect your privacy and want you to be able to trust us when it comes to data protection. We always inform you transparently about what we need your data for and if and for how



long we store it. This allows you to decide for yourself for which purposes we may use your data. To ensure the best possible security, the information is always transmitted to us in encrypted form. If you no longer wish us to use your data, please let us know, for example by email. <a href="mailto:GDPRinfo@guest-tek.com">GDPRinfo@guest-tek.com</a>

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#### **GENERAL INFORMATION**

The purpose of this privacy policy is to provide you with information concerning the processing of personal data when using our website and related services.

## 1.1. Processing of Personal Data

Personal data within the meaning of Art. 4 of the EU General Data Protection Regulation (GDPR) are all information relating to an identified or identifiable natural person, e.g. name, address, email address, etc.

#### 1.2. Controller

Responsible for the processing of personal data within the meaning of Art. 4 (7) GDPR is:

GuestTek Interactive Entertainment Ltd.

www.guesttek.com/contact-us/

e-mail: GDPRinfo@guest-tek.com

## 1.3. Rights of the Data Subject

As data subject affected by the data processing activity, you have the following rights with regard to your personal data according to Art. 15 et seqq. GDPR:

- Right of access;
- Right to rectification and to erasure;
- Right to restriction of processing;
- · Right to data portability; and
- Right to object.

Furthermore, you have the right to lodge a complaint with a supervisory authority concerning the processing of your personal data.

# 1.4. Disclosure to Authority

In the event of a legal obligation, we reserve the right to disclose information about you if we are required to surrender it to competent authorities or law enforcement bodies.

## COLLECTION & PROCESSING OF PERSONAL DATA WHEN VISITING OUR WEBSITE

We will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), and "legitimate interests". Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact us GDPRinfo@Guest-tek.com

Legal basis: Art. 6 (1) b GDPR.

# What we collect

We may collect the following information:

- Name and job title,
- Contact information including email address,
- o Demographic information such as postcode, preferences and interests,
- Other information relevant to customer surveys and/or offers.

## What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- o Internal record keeping.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information, which we think you may find interesting using the email address which you have provided.
- o From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customize the website according to your interests.

#### 2.1 Cookies

In addition to the aforementioned data, cookies and other similar storage technologies (hereinafter referred to as "Cookies") are stored on your computer when visiting and using our website. Cookies are small text files that are stored by your browser on your device to save certain information. The next time you visit our website on the same device, the information saved in the cookies will subsequently be transmitted either to our website ("First Party Cookie") or to another website to which the cookie belongs ("Third Party Cookie").

Through the information saved and returned, the respective website recognizes that you have already accessed and visited it with the browser you use on that device. We use this information to be able to design and display the website in an optimum way in line with your preferences. In that respect, only the cookie itself is identified on your device. Beyond this extent, your personal data will only be saved upon your express consent or if it is strictly necessary to be able to use the service offered to and accessed by you accordingly.

This website uses the following types of cookies, the scope and functionality of which are explained below:

- Strictly necessary cookies (Type A)
- Functionality, Performance and Marketing Cookies (Type B)
- Consent based Cookies (Type C)

You can find more information on the cookie types set and used in the description of the tools implemented on our websites in this privacy policy.

# 2.1.1 Strictly necessary cookies (Type A)

Strictly necessary cookies guarantee functions without which you cannot use our web pages as intended. These cookies are used exclusively by us and are therefore first party cookies. This means that all information stored in the cookies will be returned to our website.

Strictly necessary cookies serve, for example, to ensure that you as a registered user always remain logged in when accessing various subpages of our website and thus do not have to reenter your login data every time you access a new page.

The use of strictly necessary cookies on our website is possible without your consent. For this reason, strictly necessary cookies cannot be activated or deactivated individually. However, you can deactivate cookies in your browser at any time (see below).

Legal basis: Art. 6 (1) b GDPR.

# 2.1.2 Functionality, Performance and Marketing Cookies (Type B)

Functionality cookies enable our website to store information already provided (such as registered name or language selection) and to offer you improved and more personalized functions based on this information. These cookies collect and store only anonymous information so that they cannot track your movements on other websites.

Performance cookies collect information about how our websites are used in order to improve their attractiveness, content and functionality. These cookies help us, for example, to determine whether and which subpages of our website are visited and in which content users are particularly interested. In particular, we record the number of visits to a page, the number of subpages accessed, the time spent on our website, the order of the pages visited, which search terms led you to us, the country, region and, if applicable, the city from which access is made, and the proportion of mobile devices accessing our websites. We also capture movement, clicks and scrolling with the computer mouse to understand which areas of our website are of particular interest to users. As a result, we can tailor the content of our website more specifically to the needs of our users and optimize our offering. The IP address of your computer transmitted for technical reasons is automatically made anonymous and does not allow us to draw any conclusions about the individual user.

You can adjust at any time the cookie settings (activate or deactivate) here.

## 2.1.3 Consent based Cookies (Type C)

Cookies, which are neither strictly necessary (Type A) nor functionality or performance cookies (Type B) will be used only upon your express consent, e.g. marketing cookies.

We also reserve the right to use information that we have obtained by means of cookies from an anonymous analysis of the usage behaviour of visitors to our website in order to display specific advertising for certain of our products on our own websites. We believe that you as a user benefit from this because we display advertising or content that we think suits your interests based on your surfing behaviour, so that you will see less randomly scattered advertising or certain content that might be of less interest to you.

Marketing cookies come from external advertising companies (third party cookies) and are used to collect information about the websites visited by the user in order to create target group-oriented advertising for the user.

## Opt-out for cookies used for online advertising

You can also manage many companies' cookies used for online advertising via the consumer choice tools created under self-regulation programs in many countries, such as the US-based <a href="https://www.aboutads.info/choices/">https://www.aboutads.info/choices/</a> or the EU-based <a href="https://www.youronlinechoices.com/uk/your-ad-choices">https://www.youronlinechoices.com/uk/your-ad-choices</a>.

You can withdraw your consent to the use of consent based cookies (Type C) individually at any time with effect for the future by adjusting your cookie settings accordingly.

Legal basis: Art. 6 (1) a GDPR.

#### 2.1.4 Administration and deletion of all cookies

You can set your web browser in such a way that cookies are generally prevented from being saved to your device and/or that you are asked each time whether you are in agreement with cookies being enabled. You can also at any time delete cookies that have been enabled again. You can find out how all this works in detail from your browser's help function.

Please note that generally deactivating cookies may lead to functional restrictions of our website.

#### 2.2 Web Analytics

GuestTek uses Google Analytics for our Web Analytics. For further information, please refer to section 2.2.1 below.

## 2.2.1 Google Analytics

This website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses a specific form of cookie, which is stored on your computer and enables an analysis of your use of our website. The information about your use of this website generated by the cookie is generally transmitted to a Google server in the USA and stored there.

We would like to point out that Google Analytics has been expanded on this website to include the code "gat.\_anonymizelp();" to ensure the anonymized recording of IP addresses (so-called IP masking). Due to the IP anonymization on this website, your IP address is shortened by Google within the territory of the EU and the Treaty States of the European Economic Area. Only in exceptional cases the full IP address is transmitted to a Google server in the USA and shortened there. Google has submitted itself to the EU-US Privacy Shield, (https://www.privacyshield.gov/EU-US-Framework).

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Google uses this information on our behalf to analyze your use of this website in order to compile reports on website activities and provide additional services related to website and internet use. Google may also transfer this information to third parties as required by law or if said third parties process this data on behalf of Google. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data.

You can prevent the storage of cookies by making the proper setting using your browser software. In addition, you can prevent Google from recording the data related to your use of the website generated by the cookie (including your IP address) and from processing this data by downloading and installing the browser plugin available at <a href="https://tools.google.com/dlpage/gaoptout?hl=en">https://tools.google.com/dlpage/gaoptout?hl=en</a>.

Third party information: Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. Google Analytics Terms of Service: <a href="https://www.google.com/analytics/terms/gb.html">https://www.google.com/analytics/terms/gb.html</a>, General overview on Google Analytics security and privacy principles: <a href="https://support.google.com/analytics/answer/6004245?hl=en">https://support.google.com/analytics/answer/6004245?hl=en</a> as well as Google's privacy policy: <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>.

This website also uses Google Analytics for a device-independent analysis of visitor flows, which is carried out via a user ID. You can disable cross-device tracking of your usage in your Google Account under "My information", "Personal information".

Used Cookies: Type B. For further information, see 2.1

Cookie lifetime: up to 12 months (this applies only to cookies which have been set by this website)

Maximum storage period of used data: up to 26 months.

Legal basis: Art. 6 (1) f GDPR.

# 3.1 Contacting

When contacting or communicating with us, e.g. by email or via contact form on our website, the data you provide (your email address, if applicable your name and your telephone number, or personal data submitted during the conversation) will be stored and processed by us in order to answer your questions, requests or for the purpose of business related correspondence. We delete the data arising in this context once storage is no longer necessary, unless statutory retention obligations exist or periods of limitation must be observed.

In case of consumer inquiries through our internal consumer management tool the personal data will be usually deleted after one year.

We transfer the collected data to the relevant internal departments for processing and to other affiliated companies within the GuestTek Group or to external service providers, contract processors (e.g. hosting, call center service providers) in accordance with the purposes required (e.g. for establishing contacts, business related correspondence and customer care).

Legal basis: Art. 6 (1) b GDPR.

#### 3.2 Newsletter

The newsletter contains news, updates and further information on GuestTek. The newsletter is distributed via email to a select group of customers. If you no longer wish to receive the newsletter, you can unsubscribe at any time by replying "unsubscribe".

These collected data are automatically deleted after 18 months if they no longer respond to the newsletter, e.g. open (inactivity).

Legal basis: Art. 6 (1) a GDPR.

## OBJECTION OR WITHDRAWAL OF YOUR CONSENT TO THE PROCESSING OF PERSONAL DATA

If you have given your consent (Art. 6 (1) a GDPR) to the processing of your data, you can withdraw your consent at any time. Such a withdrawal influences the permissibility of processing your personal data after you have given it to us.

If we base the processing of your personal data on the weighing of interests (Art. 6 (1) f GDPR), you may object to the processing. This is the case if processing is not necessary in particular to fulfil a contract with you, which is described by us in the following description of the functions. When exercising such objection, we ask you to explain the reasons why we should not process your personal data as we have done. In the event of your justified objection, we will examine the situation and either stop or adjust data processing or point out to you our compelling reasons worthy of protection, on the basis of which we will continue processing.

Of course, you can object to the processing of your personal data for purposes of advertising and data analysis at any time. You can inform us about your objection under the above-mentioned contact details for the controller.

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