

PRIVACY NOTICE

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

What this Privacy Notice covers

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

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

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

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

Personal data we collect

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

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

When you book a hotel accommodation or other products or services from our offers, we collect data for the fulfillment of your contract with us:

- Your personal data, including your address, email address, phone number and date of birth.
- The personal details from your fellow passenger.
- Payment details (e.g. credit card details, account information and billing address)
- Your booked products and services.

When you browse our websites or use our mobile apps, we may collect:

- Travel preferences.
- Information about your browsing behaviour on our websites and mobile apps.
- Information about when you click on one of our adverts, including those shown on other organisations' websites.
- Information about the way you access our digital services, including operating system, IP address, online identifiers and browser details.
- Social preferences, interest and activities.

If you book , buy or order hotel accommodation, or other products or services in our hotels, or browse our websites or use our mobile apps, we may collect:

- Information about the traveller, passport data, other identification information.
- Insurance data.
- Relevant medical data and any special, dietary, religious or disability requests.
- Information about your purchases, such as what you purchased, when and where you purchased it, how you paid, and credit or other payment information.
- Information about your browsing behaviour on our websites and mobile apps.
- Information about when you click on one of our adverts, including those shown on other organisations' websites.
- Information about when you click on one of our adverts, including those shown on other organisations' websites
- Social preferences, interests and activities.
- Your preferences regarding accommodation.
- Your questions/comments/wishes in connection with your hotel accommodation.

During your stay in our hotels we may collect:

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

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

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

Other sources of personal data:

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

Personal data you provide about other individuals:

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

Using your personal data

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

To provide the products and services you request

We need to process your personal data so that we can manage your account or booking, provide you with the products and services you want to buy and help you with any orders and refunds you may ask for.

To manage and improve our products, services and day-to-day operations

We use personal data to manage and improve our products, websites, mobile apps, customer loyalty or recognition programme(s) and other services.

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

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

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

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

To make contact and interact with you

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

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

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

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

We do not sell your personal data to third parties.

@ Marketing measures with your consent

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

When you book or register with us we will ask if you would like to receive marketing communications. We will require verification of your online contact information for marketing purposes using our double opt-in procedure. This will require you to activate a link sent via email, we will only send you email marketing when you have done this. You can retract your consent to our marketing communications at any time (right to object)

We verify your online contact information for marketing information once again, so we ask you, for example when registering for e-mail marketing, to confirm this in the so-called double opt-in procedure, i.e. we only send you e-mail marketing Communication when you activate via the Sent link. . You can retract your consent to the marketing communication at any time (right to object e.g. by email to crm@robinson.com). If you no longer wish to receive advertising via a particular channel (e.g. telephone), you should inform us of this in the same way as mentioned above as well as a retraction for all given consent for marketing purposes. Of course, the choice is entirely yours, but if you say you do not want to receive marketing information from us this will prevent you from receiving great offers or promotions that may be of interest to you.

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

Product recommendation via e-mail

As a customer of Robinson Club GmbH you will receive regular product recommendations from us by email. You will receive these product recommendations from us regardless of whether you have subscribed to a newsletter, or if you have agreed to the marketing communication by email. On the basis of your latest purchase with us, we will send you information about our product offerings. We strictly comply with the legal requirements. If you do not wish to receive any product recommendations by email from us, you can retract your consent at any time; sending an email to: crm@robinson.com is sufficient. Of course you will also find an unsubscribe link in every email.

To personalise your experience

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

To do this, we may use your personal data to better understand your interests so that we can try to predict what other products, services and information you might be most interested in. This enables us to tailor our communications to make them more relevant and interesting for you. We use existing information such as receipt and read confirmation of e-mails, information about computers and connection to the Internet, operating system and platform, your order history, your service history, date and time you visited the homepage and products you have looked at. This analysis and evaluation helps us to better understand you as a customer and it allows us to provide you with personalised offers and services. Our aim is to make our advertising more useful and interesting for you, which enables us to offer you products and services that better meet your needs as a customer

If you do not want to receive a personalised service from us, you have the right to object your consent to us at any time by writing (e.g. email) to crm@robinson.com. In this case, you will receive unadjusted standard advertising. Of course, you can also retract your consent to all marketing communications by us at any time or revoke your consent with effect for the future. We will update our records as soon as we can.

Market research

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

Sharing personal data with suppliers and retail partners

In order to provide products or services requested by you we may share personal data with suppliers of your travel arrangements, including airlines, hotels and transport companies, including independent operators of WellFit Spas or sports providers (e.g. water sports), security services.

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

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

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

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

Sharing personal data with regulatory authorities

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

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

Protecting your personal data

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

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

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by organisations operating outside the EEA who work for us or for one of our suppliers. We put in place appropriate protections to make sure your personal data remains adequately protected and that it is treated in line with this Notice. These protections include, but are not limited to, appropriate contract clauses, such as standard contract clauses approved by the European Commission (https://ec.europa.eu/info/law/law-topic/data-protection_en), and appropriate security measures.

Data retention

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

About cookies and similar technologies

Cookies are small data files that allow a website to collect and store a range of data on your desktop computer, laptop or mobile device. Cookies help us to provide important features and functionality on our websites and mobile apps, and we use them to improve your customer experience. Please see our separate Cookie Notice.

Links to other websites

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

Social media features

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



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

If you do not want social networks to collect data about you through active plugins, you can use the "block third party cookies" feature in your browser settings. Your browser will then not send cookies to the server for embedded content from other providers. With this setting, however, other cross-page functions may no longer work except for the plug-ins.

When these plugins are enabled, your browser will connect to the servers of the social network directly as soon as you access a website of our internet presence. The content of the plugin is transmitted directly from the social network to your browser and is integrated into the website. By incorporating the plugins, the social network receives the information that you have called the corresponding page of our Internet presence. If you are logged in to the social network, you can assign the visit to your account. If you interact with the plugins, such as the Facebook 'like me' button or leave a comment, the corresponding information is transmitted from your browser directly to the social network and stored there. The purpose and scope of the data collection and the further processing and use of the data by social networks, as well as their respective rights and settings for the protection of your privacy, can be consulted in the data protection information of the relevant networks or Web pages. You will find the links below.

Even if you are not signed in to social networks, Web pages with active social plug-ins can send data to the networks. An active plugin is used to set a cookie with an identifier each time the webpage is visited. Since your browser sends this cookie unmasked with every connection to a network server, the network could in principle create a profile with Web pages of the user belonging to the identifier. It would also be possible to assign this identifier to a person again later, for example when you log on to the social network later.

Involvement Facebook Social Plugins

In our website are Social plugins ("plugins") of the social network facebook.com, which Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"),

Involved. If you wish to know more about the purpose and the scope of the data collection, the further processing and use of the data by Facebook, as well as your rights and settings in this regard to protect your Privacy, please refer to the Facebook privacy policy:

<http://www.facebook.com/policy.php>.

You can also block Facebook social plugins with add-ons for your browser, for example With the "Facebook blocker".

Involvement Google Plus Plugins

In our website are Social plugins ("plugins") of the social network of Google Plus, which From Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States

("Google") is involved. If you wish to know more about the purpose and the scope of the data collection, the further processing and use of the data by Google Plus, as well as your rights and settings in this regard for the protection of your privacy, please refer to the

Google Privacy Policy: <https://policies.google.com/privacy>

Involvement Twitter Plugins

In our website are Social plugins ("plugins") of the social network of Twitter, which is

Twitter Inc., based in 795 Folsom St., Suite 600, San Francisco, CA 94107, USA, operates

("Twitter"). If you wish to know more about the purpose and scope of the data collection, the further processing and use of the data by Twitter as well as your rights and settings to protect your privacy, please refer to the

Privacy policy of Twitter: <https://twitter.com/privacy>.

Involvement Pinterest Plugins

On this website are further plugins of the social Network Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA ("Pinterest") integrated. The Pinterest plugin is visible on the "Pin it-button" on our website.

If you click on the Pinterest "Pin IT-button" while you are logged in to your Pinterest account, you can link the contents of our pages to your Pinterest profile. This allows Pinterest to associate the visit to our pages with your user account. We point out that we are not aware of the contents of the transmitted data and their use by

Pinterest. For more information, please refer to the Pinterest Privacy policy:

<https://policy.pinterest.com/en/privacy-policy>

Involvement Instagram Plugins

On this website are also integrated plugins of the social Network Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA ("Instagram"). The Instagram plugin is visible by the "Instagram-button" on our site.

If you click on the Instagram button while you are logged in to your Instagram account, you can link the content of our pages to your Instagram profile. This will allow Instagram to associate the visit to our pages with your user account. We point out that we are not aware of the content of the transmitted data and its use by Instagram. For

more information, please refer to the Instagram privacy policy: <http://instagram.com/about/legal/privacy/>

Accessing and updating your personal data; and complaints

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

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

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

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

We will update or erase your data, unless we have to keep it for legitimate business or legal purposes. You can also contact us if you have a complaint about how we collect, store or use your personal data. We aim to resolve complaints but if you are dissatisfied with our response, you may complain to the local data protection authority: <https://www.lfd.niedersachsen.de/startseite/>.

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

Please submit your request or complaint in writing to the Legal Department/Data Protection Officer: Robinson Club GmbH: DPOHotels@tui.com

Legal basis for processing personal data

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

- We have your consent;

Example: Customer account

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

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

Example: To provide the products and services you request

We need to process your personal data so that we can manage your account or booking, provide you with the products and services you want to buy and help you with any orders and refunds you may ask for.

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

Example: Sharing personal data with regulatory authorities

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

- It is necessary to manage your booked accommodation:

Example: To provide the products and services you request

We need to process your personal data so that we can manage your account or the products and services, you've booked, in our hotels, according to your wishes during your stay to be able to offer.

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

Example: In an emergency

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

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

Example: Security operations

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

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

Example: To personalise your experience

We may use your personal data to better understand your interests so that we can try to predict what other products, services and information you might be most interested in. This enables us to tailor our communications to make them more relevant and interesting for you.

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

 [Change to our Notice](#)

This Notice replaces all previous versions. We may change the Notice at any time so please check it regularly on our website(s) for any updates. If the changes are significant, we will provide a prominent notice on our website(s) including, if we believe it is appropriate, electronic notification of Privacy Notice changes.

Last update: **May 2018**

Key terms

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

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

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

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