Explanatory Notes on Data Protection applicable to Season Tickets with Face Recognition

These Explanatory Notes tell you how we process your personal information and explain the rights you have under the data protection regulations in force when you buy HANSA-PARK season tickets.

We process your personal information solely as provided for by law, in the European General Data Protection Regulation (GDPR) and the Federal Data Protection Act [BDSG]. We collect and process the categories of personal data listed below:

Master data (surname, given name, title*, date of birth), **contact data** (email address, telephone number*), **contract data** (e.g. card number), **billing data, biometric data** (face recognition data, photo) and **content data** that we process as part of our communication with you.

(Data marked* are not mandatory.)

1. Data Controller and Data Protection Officer

As the controller HANSA-PARK Freizeit- und Familienpark GmbH & Co. KG, Am Fahrenkrog 1, 23730 Sierksdorf is responsible for how your personal information is processed.
You can contact our Data Protection Officer, compolicy GmbH, Schwedenkai 1, 24103 Kiel, on the telephone: +49(0)431-9089480 or by email: info@compolicy.de or datenschutz@hansapark.de.

2. How and on what Legal Basis do we process your Personal Data?

2.1 Issuing of season tickets and biometric entrance control

We only process your personal data mentioned above to issue a personalised season ticket, to bill you for it and for the subsequent biometric Park entrance control (season ticket with facial recognition for identification purposes, alternatively with a photograph in the event of confusion).

We will create a so-called template of your face and a photograph when you enter the Park for the first time. The template is just a face template that will be stored in our system as a sequence of numbers.

An entrance control system will scan your season ticket and a camera system will briefly record your face. Your face will then be compared with the template stored in our system. If your face matches the template, you can enter our Park through the turnstile.

The system will only store the template and the photograph for the period of time the season ticket is valid.

The photograph will not normally be used at the entrance control. It is stored for the benefit of the ticket holder to ensure that he/she can enter the Park even if, in the rare event, the biometric face recognition system does not work properly and confusions with other persons need to be clarified. The employee in charge is the only one who can match the photograph to you for identification purposes, however only in relation to your season ticket and only in your presence. In other words, you will be able to enter the Park even if there are technical problems. Your photograph will only be stored for as long as your season ticket is valid. It can only be called up at the actual entrance control and will automatically be deleted once your season ticket expires.

2.2 Processing of personal data based on consent (Art. 9(2) (a) GDPR in connection with Art. 6(1) 1st sentence (a) GDPR in connection with Art. 7 GDPR)

To enable us to process biometric data (special data category under Art. 9(1) GDPR), the legal provisions obligate us to obtain your consent. You can withdraw your consent at any time and we will stop processing your data. The withdrawal of consent applies to future processing; it does not affect the lawfulness of processing based on consent before consent was withdrawn. You can withdraw your consent informally, e.g. by post or by email.

However please note that after you have withdrawn your consent, we will not be able to check your identity based on the season ticket you are holding, and you will not be able to enter our Park via the entrance control system.

If you have withdrawn your consent, we can convert your season ticket to a *season ticket without template*. For you to be able to enter our Park, you will need to present your identity card and a visual inspection will be carried out each time you wish to visit the Park. Please go to our service booth at the entrance area prior to each visit.

The season ticket without template is offered as an alternative to the season ticket with template. It can be obtained from the service booth at the Park entrance area.

3. Recipient of Data and Disclosure of Data, Third Country

Within HANSA-PARK the only parties that have access to your data are parties that need them to meet our obligations mentioned above. This also applies to service providers and vicarious agents engaged by us. We may disclose your data to processors who process data on behalf of us as defined in Art. 28 GDPR for the purposes outlined in these Explanatory Notes. We will only disclose personal information to third parties if this is necessary for the purposes mentioned above or if you have given your consent.

We do not transmit any data to third countries (states that are not a member of the European Economic Area – EEA) and we do not intend to do so in the future.

4. Storage Period and/or Erasure of Personal Information

We retain your personal information for the purposes mentioned above (identification purposes). Your data will be processed for the first time upon collection, i.e. when you or a third party provide them to us. We will erase your personal information after the legal relationship with you on which the data processing is based has ended, each party has fulfilled their obligations under the contract and there are no other legal obligations or reasons to store the personal data.

Such reasons are, for example, the statutory obligation to retain data as provided for in the German Commercial Code [HGB] and the German Fiscal Code [AO]. In other words, we will erase your personal information not later than after the legal retention period has expired, which usually is 10 years after the contract has ended. Insofar as we are not obligated to retain your data, they will be erased once the processing purpose ceases to be relevant. And finally, the storage period also depends on the statutory period of limitation applicable taking into account our reasonable legitimate interests. Pursuant to section 195 et seq. German Civil Code [BGB], for example, the standard limitation period is three years. In specific cases, however, the statutory period of limitation may be up to 30 years. Except for the obligation to retain accounting data under tax law (without biometric data), your data will be erased upon the expiry of your season ticket unless the data must be stored for a longer period of time on the grounds of compelling legitimate interests in a specific case.

5. Your Rights

If you have questions or complaints regarding our Privacy Statement, please contact us, die HANSA-PARK Freizeit- und Familienpark GmbH & Co. KG, Am Fahrenkrog 1, 23730 Sierksdorf, info@hansapark.de.

You have the right to request from us, the controller, access to your personal data (Art. 15 GDPR) as well as rectification (Art. 16 GDPR), erasure (Art. 17 GDPR) and restriction of processing of your personal data (Art. 18 GDPR). Pursuant to Art. 20 GDPR you have the right to data portability. To assert your right to demand access to and erasure of your personal data, the restrictions provided for in sections 34 and 35 of the Federal Data Protection Act [BDSG] apply. On top, you have the right to lodge a complaint with a data protection supervisory authority (Art. 77 GDPR in connection with section 19 BDSG). The Independent Centre for Privacy Protection Schleswig-Holstein [Unabhängige Landeszentrum für Datenschutz Schleswig-Holstein], Holstenstr. 98, 24103 Kiel is in charge of HANSA-PARK.

You will find more information on data protection and your rights under data protection laws on our website at www.hansapark.de/datenschutz.

6. No Automated Decision-Making

We have no automated decision-making processes, including profiling pursuant to Art. 22 GDPR in place to establish and carry out the season ticket purchase and the later use of the tickets.

7. Amendments

From time to time, we may revise our Privacy Statement. We will inform you about any changes to it.

Sierksdorf, October 2024