As of October 2026

1. Controller

We, STAG Hotelverwaltungs GmbH, respect your privacy and the protection of your personal data; we therefore endeavour to comply with the legal requirements (in particular the GDPR and the Data Protection Act *[Datenschutzgesetz, DSG]*) when processing such data. In this privacy policy, we inform you in compliance with Articles 13 and 14 of the GDPR about the type of personal data (hereinafter "Data" for short) we process about you when you use our services and about the extent and purpose of such processing.

Our data protection officer is lexetdata e.U.,
Dr. Beata Mangelberger.

You can contact us at dsb.at@deutschehospitality.com.

2. What types of Data are being processed?

We process those Data about you which you provide to us on a voluntary basis or which otherwise become known to us. These include

(i) your contact details (first and last names, academic degree, form of address, address, e-mail address, telephone and fax numbers),
(ii) details contained in travel documents (passport number, date of birth, sex, nationality, issuing authority, place of birth, validity period) and identity cards or driving licences you present to us as well as licence plate numbers,
(iii) payment details (credit cards, debit cards or other bank cards and any related data for payment transactions),
(iv) information related to your stay about tastes and preferences, contact persons, special services, terms and conditions, frequent flyer numbers, bonus miles, information you provide to us in connection with our satisfaction survey, etc.
(v) special categories of Data such as data concerning health (e.g. allergies or special needs) or information about children, marriages or partnerships.

These Data are required to perform our services and also include bookings of city tours, treatments (massages), concerts, event tickets, table reservations in restaurants, etc. We process your Data and transfer them – if required – to third parties with whom we cooperate for the purpose of providing the most efficient and best possible service for our guests. Your Data as specified above are transferred or disclosed to our parent company Steigenberger Hotels GmbH, our tax advisors and, if required, lawyers or credit bureaus to be appointed by us to assert our claims against you.

The provision of your Data is required both by law and by contract and is necessary to enter into a contract with us; otherwise we cannot welcome you as a guest in our hotel.

3. For what purpose do we use your Data and on what legal basis?

The legal bases for such processing are:

(i) point (b) of Article 6(1) – if you book a room or use other services in one of our hotels by e-mail, contact form or telephone, we process your Data for the purpose of performing contractual or pre-contractual obligations;
(ii) point (a) of Article 6(1) your consent;
(iii) point (c) of Article 6(1) statutory, contractual or other legal obligations on our part (e.g. documentation rights and obligations for accounting purposes, tax and customs law, contract management, residence registration, legal disputes);
(iv) point (f) of Article 6(1) our legitimate interests (e.g. to improve our customer service, intra-group transfers, also for direct marketing purposes, or to pursue our own legal interests and to safeguard claims).

4. How long do we store the Data?

We store your Data only for as long as we need them to fulfil the above purposes. The storage period depends on the duration of our business relationship, the consents given by you, and the statutory retention requirements and legal obligations to which we are subject. In accordance with retention requirements under tax and business law as well as the Residence Registration Act *(Meldegesetz, MeldeG)*, we store the Data which you provided to us in connection with a room reservation and other services for a period of seven years. Enquiries relating to offers are stored by us for a period of one year to be able to adequately respond in the event of any questions.

5. Where do your Data come from?

We also gather personal data from other (where appropriate, public) sources, for example from booking platforms, credit rating databases, travel agencies, etc.

6. Where do your Data go?

We disclose or transfer your Data to third parties only if this is required for the purpose of contract management or any reasons in relation thereto.
We use the *opera* and *NOR1* software of our service provider ORACLE Deutschland B.V. & Co. KG to manage contracts and prepare offers. We use *dailypoint*, which is provided by Toedt, Dr. Selk und Coll. GmbH, to manage guest data.
To rate your stay in one of our hotels and handle any complaints, we use the *Customer Alliance* software provided by our contractual partner CA Customer Alliance GmbH as well as the *zenloop* software by the service provider of the same name. Faundit ApS handles the forwarding of items left behind or lost at our facility. To protect your Data, we have entered into so-called data processing agreements with these service providers, under which personal data are processed subject to our instructions. Transfers to third countries take place only in compliance with the applicable legal requirements.

7. What are your rights?

(i) You have the right of access, the right to rectification and the right to erasure pursuant to Articles 15, 16 and 17 of the GDPR: You have the right to obtain information as to whether or not Data concerning you are being processed by us and, if so, what kind of Data are being processed. For your own protection – to prevent unauthorised access to your Data –, we will verify your identity in an appropriate manner before providing access. Should your Data be outdated, please let us know as soon as possible so that we can rectify them. If the requirements under Article 17 of the GDPR are met, we will erase your Data accordingly.

(ii) You have the right to withdraw any consent under data protection law you have given us at any time. The withdrawal does not affect the lawfulness of processing before such withdrawal. As a result of the withdrawal, we will no longer process your Data for the above purposes from then on.

(iii) Since we process Data based on legitimate interests, you generally have a right to object if there are grounds relating to your particular situation that speak against such processing. Since we process Data for the purpose of direct marketing (among other things), you have the right to object to such processing for direct marketing purposes at any time.

(iv) You also have the right to restriction of processing pursuant to Article 18 of the GDPR and the right to data portability pursuant to Article 20 of the GDPR. You can also lodge a complaint with a data protection supervisory authority; in Austria, this is the Data Protection Authority, Barichgasse 40-42, 1030 Vienna.

8. Video surveillance

To ensure your safety and to protect and ensure the safety of our employees and our property, designated video surveillance systems are in place at the entrances and exits and in the parking garages in order to safeguard our legitimate interests. The recordings are deleted within 72 hours or as soon as they are no longer required to fulfil their purpose (analysis in the course of an incident).

9. Miscellaneous

To protect your Data, we have taken technical and organisational measures, which we adjust and implement as needed. We reserve the right to regularly update our privacy policy. The new version applies from the moment of its provision.