

## PRIVACY AND COOKIES POLICY

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### GENERAL INFORMATION

This Privacy and Cookies Policy informs Users about what personal data may be collected when they use the website [www.sabaparking.com](http://www.sabaparking.com) (hereinafter, the "Website") and how SABA PARK DEUTSCHLAND GmbH (hereinafter, "SABA") processes, uses and protects said data. It also informs them about the cookies, if any, used on the Website.

SABA treats Users' privacy and the confidentiality of their personal data as matters of priority and complies with the relevant data protection regulations, in particular those of the European Data Protection Regulation ("GDPR") and the Federal Data Protection Act ("BDSG").

### CHANGES TO THE PRIVACY AND COOKIES POLICY

SABA reserves the right to modify or update this Privacy and Cookies Policy at any time. Users must therefore read it carefully, as it may have been subject to unannounced modifications that took effect on the date indicated therein. SABA therefore recommends that you check the website periodically for the latest Privacy Policy.

### PRIVACY POLICY

#### WHO IS THE DATA CONTROLLER OF MY PERSONAL DATA?

The data controller of the personal data collected through the Website is.

SABA PARK DEUTSCHLAND GmbH,

Friedrichstraße 185-190, 10117 Berlin

You can find further information about the controller under [Impressum](#).

You may contact in relation to any matter concerning the processing of your personal data, by emailing [info.de@sabagroup.com](mailto:info.de@sabagroup.com) or by writing to the postal address provided above.

#### HOW DO YOU COLLECT MY DATA?

##### Data processing when visiting the website

When you access the Website, SABA automatically collects, stores and uses technical information as described in the Cookies Policy. The legal basis is the Users consent.

##### Data processing when contacting SABA

You can use the contact form on the Website to submit enquiries to SABA, stating your name

and e-mail address.

You can also contact SABA by e-mail. When you contact SABA by e-mail, the data you provide (e.g. your e-mail address, your name and telephone number if applicable) will be stored by SABA in order to answer your questions.

The data provided by you will be stored by SABA in order to enable communication with you (legal basis is Art. 6 (1) f) GDPR).

#### **WHAT DO YOU USE MY DATA FOR?**

The data you provide will be used by SABA to process requests you send through the means available on the Website.

The legal basis for processing your data is express consent, which will be obtained when you send your request.

Data collected automatically will be processed as described in the Cookies Policy. By using the Website you agree that, unless you have set your device's browser to reject them, we can place the types of cookies described in the Cookies Policy on your device, and use that data in accordance with this policy.

#### **HOW LONG WILL YOU KEEP MY DATA?**

SABA will only store your data for as long as is necessary to provide the Website and related services, or as long as SABA is required by law to store your data.

Personal data collected while surfing on the Website is stored for a period of 14 days, unless an unusual incident requires a longer storage period (e.g. a hacker attack).

SABA will delete the data collected in connection with a contact (e.g. by e-mail or contact form) after the storage is no longer necessary. Unless SABA is otherwise entitled or obliged to store such data, this shall apply in particular when the respective conversation with you has ended, e.g. when the underlying facts have been conclusively clarified.

#### **HOW DO YOU PROTECT MY DATA?**

SABA is committed to information security and has defined security policies and procedures and complies with the organisational and technical measures provided by law to guarantee the confidentiality of your data.

#### **WITH WHOM DO YOU SHARE MY PERSONAL DATA?**

SABA may hire third parties to provide certain services, which may involve access to and/or processing of your personal data by said third parties as data processors. In all cases, however, third parties are required to comply with current legislation and SABA's security policies, and must guarantee that they will use the information in accordance with SABA's instructions and implement the appropriate technical and organisational measures to guarantee the security of the information.

#### **WHAT ARE MY RIGHTS CONCERNING MY PERSONAL DATA?**

As a data subject, you have the following rights about which SABA would like to inform you below.

To exercise your rights, you may contact with SABA by writing to the postal address provided above or by e-mail: [info.de@sabagroup.com](mailto:info.de@sabagroup.com).

- **Right of access:** you have the right to request information about which of your personal data SABA has collected and processed. This includes information about the purposes such data are used for and the time period such data will be stored as well as information about the recipients or recipient categories to whom the data will be disclosed. Furthermore, you have the right to obtain a copy of the personal data undergoing processing.
- **Right to rectification:** you have the right to obtain rectification of personal data that is not or no longer accurate. You also have the right to have incomplete personal data completed. SABA forwards corrections of your personal data to third parties where this is legally required.
- **Right to erasure ("Right to be forgotten"):** you have the right to obtain erasure of your personal data from SABA, where one of the following applies:
  - Your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed or the purpose has been fulfilled;
  - You have withdrawn your consent and there is no other legal ground for the processing;
  - You have objected to the processing and there are no overriding legitimate grounds for the processing; where personal data are processed for direct marketing purposes your objection suffices to end the processing;
  - Your personal data have been unlawfully processed;
  - Your personal data must be erased for compliance with a legal obligation in Union or Member State law, to which SABA is subjected.

Please consider that your right to erasure may be restricted by law.

- **Right to restriction of processing:** you have the right to obtain from SABA restriction of processing, where one of the following applies:
  - You contest the accuracy of your personal data, for a period of time, that enables SABA to verify the accuracy of the personal data;
  - The processing is unlawful and you oppose the erasure of the personal data and request the restriction of use instead;
  - SABA does no longer need the personal data for the purposes of processing, but you require the personal data for the establishment, exercise or defence of legal claims, or

- You have objected to the processing, yet verification whether SABA's legitimate grounds override yours are still pending.

We will inform you about a restriction according to the aforementioned grounds before we lift the restriction of processing.

- **Right to withdraw the consent:** you have the right to withdraw your consent at any time to take effect in the future. Your notice of withdrawal does not need to meet any formal requirements. You may simply send an informal notice to the abovementioned contact addresses. The withdrawal of consent does not affect the lawfulness of processing before the withdrawal.
- **Right to data portability:** you have the right to receive the personal data concerning yourself and provided by you in a structured, common and machine-readable format and to transmit these data to third parties. The exercise of your right to data portability does not in any way affect your right to erasure.
- **Right to lodge a complaint with a Supervisory Authority:** you have the right to lodge a complaint with the competent supervisory authority. The competent authority for SABA PARK DEUTSCHLAND GMBH is the Berliner Beauftragte für Datenschutz und Informationsfreiheit.
- **Right to object:** you have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data, if SABA based the processing on legitimate interest. If you object SABA will no longer process your personal data, unless:
  - SABA is able to demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms, or
  - The processing serves the establishment, exercise or defence of legal claims.

**You especially have the right to object to the processing of your personal data for direct marketing, if SABA uses your data for such purposes. If you object to SABA's processing of your personal data for direct marketing, SABA will no longer use your personal data for this purpose.**

## **COOKIES POLICY**

### **WHAT ARE COOKIES?**

Cookies are small files that are stored on devices used to access websites (e.g. computers, smartphones and tablets) and that contain certain information. There are different types of cookies:

- Depending on the entity that manages the equipment or domain from which the cookies are sent and that processes the data obtained, these can be:
  - Own cookies: those that are sent to the User's device from equipment or a domain

managed by SABA and from which the service requested by the User is provided;

- Third-party cookies: those that are sent to the User's device from equipment or a domain that is not managed by SABA, but by another entity that processes the data obtained through cookies.
- Depending on the time they remain active on the terminal equipment, these can be:
  - Session cookies: those that are designed to collect and store data while the User accesses a website and remain on the User's device as long as the visit lasts (e.g. until the browser is closed and the visit ends);
  - Permanent cookies: those that are stored on the device and can be accessed and processed for a period defined by the person responsible for the cookie, which can last from a few minutes to several years.
- Depending on the purpose for which the data obtained through cookies is processed, these can be:
  - Technical cookies: those that are necessary to ensure that a website functions correctly and the different options and services offered on the website can be used. For example, identifying user sessions, personalising the website interface, allowing video content to be reproduced and displaying the banner with the notice about the use of cookies;
  - Personalisation cookies: those that allow the User to access the service with some general features predefined based on a series of criteria on the User's device, such as language, the type of browser from which the website is accessed and the regional setting);
  - Analysis cookies: those that, whether they are processed by the owner of the website or by third parties, make it possible to monitor and analyse the behaviour of website users and quantify the number of users, and thus measure and statistically analyse how the website is used through aggregate or statistical information;
  - Advertising cookies: those that make it possible to manage, as efficiently as possible, any advertising spaces the owner has included on the website, based on criteria such as edited content and the frequency with which adverts are shown.
  - Social cookies: those that are necessary for external social networks such as Facebook, Google, Twitter, Pinterest and Instagram and whose function is to control interactions with social widgets on the website.

#### **WHAT COOKIES DOES THIS WEBSITE USE?**

This Website uses third-party cookies to collect information about the use of the Website and to analyse Users' browsing habits in order to make browsing easier, ensure they can access certain features and improve their browsing habits.

Information collected about Users' browsing habits is anonymous and is used solely for the

purposes of obtaining statistics and making improvements. It includes the number of pages visited, the language, the city associated with the IP address from which the User accesses the site, the number of Users who visit the site, the frequency and recurrence of the visits, the length of visits, the browser used, the operator or type of device from which the visit is made and the operating system used.

This information is used to improve the Website by adapting it to new needs and providing Users who visit it with a better service.

SABA uses Google Analytics' audience measurement system, a tool for obtaining and analysing browsing information and determining how Users interact with the Website. This tool makes it possible to obtain information that can be used to improve the browsing process and offer Users a better service. The legal basis for the use of Google Analytics is the consent of the Users.

Google Analytics is a service provided by Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA).

Google Analytics uses techniques, such as cookies that make it possible to analyse your use of the website. The information concerning your use of this website is normally transmitted to a Google server in the USA and stored there. However, when the IP address is anonymised on this website, the IP address is shortened before transmission within the Member States of the European Union or other signatories of the Convention on the European Economic Area. Only in exceptional cases is the complete IP address transmitted to a Google server in the USA and shortened there. For the exceptional cases in which personal data is transferred to the USA, Google has committed itself under the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. The anonymised IP address transmitted by your browser within the framework of Google Analytics will not be merged with other Google data.

You can prevent the data generated by the cookie regarding your use of the website (including your IP address) from being collected and sent to Google as well as the processing of the data by Google by downloading and installing the browser plug-in available through the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

A description of the type of cookies used by Google Analytics and their expiration times can be found at the following link:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

## **HOW CAN I MANAGE COOKIES?**

You can view, allow, block or delete the cookies installed on your device by modifying your browser settings. However, please be aware that, if you do so, you may not be able to enjoy all of the Website's functions.

The links below provide information on how to disable cookies by changing your browser settings:

- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=en-GB>
- Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- Safari: <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Finally, please be aware that you are entitled to revoke your consent to the use of cookies by SABA at any time by configuring your browser in the terms indicated above.

**DATE OF MOST RECENT UPDATE:** May 14, 2019

## IMPRESSUM

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Saba Park Deutschland GmbH, represented by the managing director

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Registered in the commercial register of the district court of Charlottenburg, register number: HRB 10 45 14

Sales tax identification number according to §27a UStG: **DE206657437**