

# Data Protection Statement

## Controller and data protection officer

1. The data controller under data protection law shall be smartseller Flughafen Nürnberg GmbH & Co. KG (Flughafenstr. 100, 90411 Nürnberg, Germany).
2. You can reach out to our Data Protection Officer under the E-Mail address [dataprotection@gebr-heinemann.de](mailto:dataprotection@gebr-heinemann.de).

## Data processing when visiting our stores at the airport

### Video surveillance

1. Video recordings are processed based on Article 6 para. 1 lit. f GDPR (legitimate interests) for the following purposes:
  - a. Prevention and investigation of criminal offences (in particular theft, robberies, fraud, damage and vandalism)
  - b. Protection of domiciliary rights
2. Our legitimate interests are:
  - a. the protection of property and assets
  - b. the protection of customers, visitors and employees.

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you.

3. Video recordings are transferred to public authorities such as the police if the subject of the recording is a criminal offense.
4. Video recordings are deleted 10 days after recording. A longer storage period will only take place if this is necessary for the enforcement of legal claims or the prosecution of criminal offences in a specific individual case.

### Processing of the boarding pass

1. Sales of goods to travelers is exempt from excise duties and sales tax under certain conditions. The tax exemption allows goods to be offered to travelers at low prices.
2. When you purchase goods from our Duty Free assortment, we process information from your boarding pass to provide tax-exempt export documentation to the tax and customs authorities. The legal basis for the processing is therefore the fulfillment of legal obligations

(Council Directive (EU) 2020/262) in accordance with Article 6 (1) (c) GDPR. When you purchase goods from the food & beverage assortment, we process information from your boarding pass on the basis of our legitimate interest in accordance with Article 6(1)(f) GDPR. On the one hand, our legitimate interest is to better understand the needs of travelers at different destinations in order to improve our offer based on this. On the other hand, we have a legitimate interest in processes that are as consistent as possible and therefore less prone to disruption. In this case, data subjects have the right to object to the processing of their boarding pass data.

3. Of the data read from the boarding pass, only the non-personal data "flight date", "departure and destination airport" and "flight number" are stored as proof of export and, if necessary, submitted to the tax and customs authorities together with the proof of purchase for verification.

### **Data processing when visiting our website**

1. When visiting our website, personal data is automatically transmitted by the user's terminal device; this regards the IP address.
2. The processing of this information is based on our legitimate interest according to Art. 6 (1) (f) GDPR in ensuring the smooth set-up of the connection and in ensuring the security of the processing (e.g. for the prevention and investigation of cyber attacks) pursuant to Art. (5) (f) GDPR.
3. The record and storage of data in log files is mandatory for the provision of the online service. The log files are automatically anonymized and deleted 30 days after the end of the connection, unless there are other retention periods to the contrary. The user therefore has no right to erasure, objection or rectification.

## **Data Subject Rights**

You have the following rights with regards to the processing of your data through us:

- a. Right to complain to a supervisory authority in accordance with Article 13(2), point (d), GDPR, and Article 14(2), point (e) GDPR.
- b. Right of access in accordance with Article 15 GDPR
- c. Right of rectification in accordance with Article 16 GDPR
- d. Right to erasure ("Right to be forgotten") in accordance with Article 17 GDPR
- e. Right to restriction of processing in accordance with Article 18 GDPR
- f. Right to data portability in accordance with Article 20 GDPR
- g. Right to object in accordance with Article 21 GDPR

Notice: Users may object to the processing of their personal data in accordance with legal allowances at any time with effect for the future. The objection may in particular be made against processing for the purposes of direct marketing.

Without prejudice to any other administrative or judicial remedy, you shall have the right to complain to a supervisory authority, in particular in the Member State of your place of residence,

employment or the place of the alleged infringement, if you believe that the processing of your personal data violates the GDPR.

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