

Privacy Notice

Valid from 25 May 2018

TABLE OF CONTENTS

CONTROLLER	1
GENERAL	1
THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES	2
DURATION OF STORAGE AND RETENTION PERIODS	3
RIGHTS OF USERS	3
DATA PROTECTION CONTACT	4

Controller

The controller is Sunparadise AG, Benderer Strasse 29, FL-9494 Schaan.

General

Sunparadise AG considers it important that its website users are informed as to when, for what purposes and which personal data are processed.

Sunparadise AG reserves the right to amend this Privacy Notice from time to time. You should therefore read this Privacy Notice regularly. The date of the then-current version (valid from) may be found at the beginning of the Privacy Notice.

What are personal data?

Personal data means any information relating to an identified or identifiable natural person (e.g., name, address, telephone number, date of birth or email address).

In general, you can use our website without providing any personal data. The use of certain website services may require personal data to be provided, for instance in order to sign up for a newsletter, to leave a comment in our forum or to purchase participate in a sweepstake.

Personal data are therefore not processed as a matter of course, but rather only under *certain circumstances* and for *specific purposes*.

When are personal data processed in connection with Sunparadise AG's website?

In order to provide the Sunparadise AG's **online services**, Sunparadise AG or third parties process personal data in connection with:¹

- A. **Websites:** Personal data are processed using [\[log files\]](#), [\[cookies\]](#), and [\[analysis tools\]](#).
- B. **Collaboration tool:** Personal data are processed to enable intermediaries and partners to use our collaboration tool [\[collaboration tool\]](#).

For what purposes are personal data processed?

- Optimising the website (e.g., market research and internet audience measurement)
- Personalising the website for users
- Providing users with access to our collaboration tools for intermediaries and partners
- Ensuring data security for the users of our website

On what legal basis does Sunparadise AG process personal data?

Insofar as we obtain your **consent** to process personal data, your consent serves as the legal basis.

We also process your personal data on the basis of **our legitimate interest**. This includes processing for purposes of:

- optimising and personalising our website
- ensuring data security
- granting access to our collaboration tool for partners and intermediaries

To the extent personal data is processed based on a **legal obligation**, this serves as the legal basis. This may be the case for example relating to the disclosure of personal data to third parties or storage or retention periods.

The disclosure of personal data to third parties

Is personal data disclosed to third parties?

In general, we only disclose your personal data to third parties insofar as we have a legitimate interest in doing so or you have provided your consent.

Furthermore, your data may be disclosed to third parties insofar as we may be obliged to do so pursuant to legal provisions or an enforceable administrative or court order.

Are third parties used for processing data?

We use third party service providers for data processing. Service providers are generally involved as so-called "processors", who may only process the personal data of the users of our website in accordance with our instructions. For example, your email address may be passed along to a service provider in order for it to send you a newsletter you requested.

Is personal data sent to recipients in a third country (outside Switzerland, the EU or the EEA)?

We also provide personal data to third parties, respectively processors, that are not based in the EU/EEA or Switzerland. In this case, we ensure prior to disclosure either that the recipient provides an adequate level of data protection (e.g., on the basis of an adequacy decision for the relevant country, self-certification by the recipient for the [EU-U.S. Privacy Shield](#), the application of standard contractual clauses of the European Union) or that our users have provided their consent.

¹ [\[link to level 2 with detailed explanations\]](#)

We can provide you with an overview of the third country recipients along with a copy of the terms specifically agreed to in order to ensure an adequate level of data protection. Please use the details provided under [\[Data protection contact\]](#) to do so.

Duration of storage and retention periods

For how long does Sunparadise AG retain the personal data?

We store your data for as long as is necessary in order to provide our website services and the related services or for as long as we have a legitimate interest in continuing storage. In all other cases, we delete your personal data, with the exception of any data that we are required to retain in order to comply with legal obligations (e.g. retention obligations). Data for which a retention period applies will be blocked by us until expiration of the retention period.

Rights of users

What are your rights as a data subject?

1. **Right of access:** Users have the right to request confirmation from the controller as to which personal data concerning them is being processed and whether these data are being transmitted to a third country.
2. **Right to rectification:** Users have the right to request the controller to correct any incorrect or incomplete personal data relating to them.
3. **Right to erasure:** Users have the right to request the controller to erase promptly any personal data relating to them if these data are no longer necessary for the purposes for which they were collected or processed. The same applies if the data subject withdraws consent or objects to the processing in absence of an overriding legitimate interest of the controller or if these data are being unlawfully processed. The data subject may additionally execute this right in case where the controller is subject to a legal obligation to delete these personal data or when the personal data have been collected in the context of information society services.
4. **Right to restriction of processing:** Users have the right to request the controller to restrict processing.
5. **Right to withdraw consent:** Users have the right at any time to withdraw their consent to the processing of any personal data relating to them for any specific purpose or purposes if that processing is based on their express consent. The withdrawal of consent will not affect the lawfulness for the processing on the basis of that consent carried out prior to the withdrawal of consent.
6. **Right to object:** Users have the right at any time to object to the processing of any personal data relating to them if the processing occurs on the basis of the legitimate interest of the controller or of a third party. Where personal data are processed for **direct marketing** purposes, users have an absolute right to object to such processing at any time.

Right to lodge a complaint with the supervisory authority

You have the right to lodge a complaint with a data protection authority. In order to do so, you may contact the data protection authority competent for your place of residence or your federal state, or the data protection authority competent for us. This is:

Datenschutzstelle (DSS)
Städtle 38
Postfach 684
FL-9490 Vaduz
info.dss@llv.li

How can you exercise your rights?

In order to exercise your rights, please contact: info@sunparadise.com. Further information may be found under [\[Data protection contact\]](#).

Data protection contact

Please do not hesitate to contact us by email to info@sunparadise.com for any information or with any suggestions regarding data protection.

If you wish to contact us, you may reach us as follows:

Benderer Strasse 29
FL 9494 Schaan
Tel. +423 235 54 54
Fax +423 235 54 55
info@sunparadise.com
www.sunparadise.com

Last updated: 25.05.2018