

# PRIVACY POLICY

We take the protection of your personal data very seriously and strive to make the use of our services secure. We are also committed to observing all laws related to the protection of personal data. This Privacy Policy describes which of your data we collect and use, the purposes for which we do this, and how we protect your data.

## Contents

1. Area of applicability
2. Which data is recorded
3. Cookies and web tracking
4. Conversion measurement using the Facebook visitor action pixel
5. Use of data
6. Data security and transferring data
7. Right of cancellation, information, changing data, and contact details

### 1. Area of applicability

This Policy applies to your EliteClub membership and the EliteClub website available at <https://www.grandeliteclub.com>. Please note that this website refers to additional websites, even to those of other countries, to which other data protection regulations may apply.

As we continue to develop our websites to improve our services, we may need to amend and revise this Privacy Policy. Should this be the case, we will inform you in advance and ask for your separate approval.

### 2. Which data is recorded

Personal data we process about you with your express content includes any personal or material circumstances that we receive from you in association with your EliteClub membership and that may be attributed to you directly or indirectly (e.g. via your membership number). This includes your member ID, your full name, title, gender, date of birth, your profile picture, postal address, address coordinates (longitude and latitude), your telephone number(s), fax number, e-mail address, bank details, passport details, especially passport number, your EliteClub membership type, amount of accumulated Shopping Points and your Shopping behavior (picked and redeemed deals) and for legal persons, the company registration number, company name, address of registered office, company owner, date of foundation, tax number, VAT number, and website information.

### 3. Cookies and web tracking

Our websites use cookies, which are small text files saved on your computer that can be accessed again later. Cookies enable you to log in to our services and help us customise our website for you.

You can also use part of our website without registering or logging in. In this case, certain information will also be recorded automatically to enable us to collect statistical data regarding the use and efficiency of our website and to adapt it to suit the needs of our users. We therefore record and process information about your IP address, the time and length of your visit, the number of visits, your use of online forms, your search settings, your view setting, and your favourites setting on our website. Cookies are stored for a range of different periods. The majority of the cookies we use are deleted automatically as soon as you leave the website ("session cookies"). We make a record of every time our website is accessed and every time a user opens one of the files stored on the website. The cookies set by us are solely for our information.

We use JavaScript to record your usage behaviour on our website in order to adapt our web services to the needs of our users. In doing so, we determine your browser type, location, time, and duration of your use, URL, page name, and the website that referred you to our page. You can stop us from recording this data by disabling JavaScript directly in your browser.

We also use the following tools:

#### **Google Analytics**

This is a web analytics tool by Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, hereinafter referred to as "Google", to record your online activities on our site and to determine how many users are visiting us, what contents of our page are viewed, and how many times. The evaluation is done anonymously. Google Analytics cookies, including the Google Analytics tool "anonymous IP address" and usage data, are usually transmitted to a Google server in the United States and stored there. For further information, please refer to <https://support.google.com/analytics/answer/6004245?hl=de>. At <https://tools.google.com/dlpage/gaoptout?hl=de>, Google Analytics offers the option to opt out of data collection.

#### **Google AdWords**

This is used to record website visits for advertising purposes (remarketing) in Google and in the Display Network. When you visit a website, your browser saves cookies that allow you to be recognised as a visitor when you visit websites that belong to Google's advertising network. On these pages, ads that relate to content that you previously viewed on other websites that use Google's remarketing function can be presented to you as a visitor. You can opt out of data collection by Google AdWords on the website <http://www.google.com/settings/ads>.

#### **Conversion tracking by Google Analytics**

We use this to generate conversion statistics that measure the effectiveness of our online advertising campaigns. The conversion tracking cookie is set when a user clicks on an ad placed by Google. According to Google's privacy policy, no personal information is processed. If you do not wish to participate in tracking, you can opt out of this usage by disabling the Google conversion tracking cookie in the usage settings of your Internet browser.

In addition to the cookies described in the analytics tools used, the following additional cookies are used:

Cookie	Originator	Purpose/function
locale	EliteClub	This cookie saves the language settings of the user.
userToken	EliteClub	Authentication cookie created for logged-in users to identify them uniquely.
eupubconsent	EliteClub	This cookie is used by the IAB Europe Transparency & Consent Framework to store the user's consent to the data collection Purposes. The cookie holds an encrypted consent string that vendors participating in the framework can read and determine the user's consent.
OptanonAlertBoxClosed	EliteClub	This cookie stores if visitors have seen a cookie information notice and enables the website not to show the message more than once to a user. The cookie's lifespan is one year and contains no personal information.
OptanonConsent	EliteClub	This cookie stores information about the categories of cookies the site uses, whether visitors have given or withdrawn consent for the use of each category and prevents cookies in each category from being set in the users' browser, when consent is not given. The cookie has a normal lifespan of one year and contains no information that can identify the site visitor.

Please note that the standard Internet browsers accept cookies according to the default settings. You can also set your browser to refuse all or certain cookies or to ask you before a new cookie is received. The relevant instructions are provided by most browsers under the "Help" menu item in the menu bar. There you will also find out how to delete the cookies you have already received.

Please note that you may not be able to use all the features of our websites if you do not accept any or only some cookies.

By using our website, you agree that the cookies and tools mentioned above may be used.

#### **4. Conversion measurement using the Facebook pixel**

With your consent, we use the "Facebook Pixel" by Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA ("Facebook") on our website. This is a cookie, i.e. a small text file that is stored on your computer and can be accessed again later. With its help, actions of users can be tracked after they have seen or clicked on a Facebook ad. This allows us to track the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, in other words, it does not provide any information on the identity of the users. However, the data is stored and processed by Facebook, so that a connection to the respective user profile is possible and Facebook can use the data for its own advertising purposes, according to the Facebook Data Policy (<https://www.facebook.com/about/privacy/>). You can allow Facebook and its partners to display ads on and off Facebook. A cookie may also be stored on your computer for these purposes. By using the website, you agree to the use of the visitor action pixel.

#### **5. Use of data**

We use your personal data only in compliance with all legal requirements. We collect and process the personal data that you provide to us when you register as a member of the EliteClub and in the course of your membership, solely as part of our fulfilment of our contractual obligations to you, and furthermore, only in cases where you expressly give us your consent.

For example, we use your data to communicate with you to verify your identity and provide you with your personal member area on the EliteClub website, to process your enquiries and orders, and provide you with our services.

Only if you have also given us your separate consent to do so, we will also use your data to inform you of offers and promotions by our services and amenities, for example.

#### **6. Data security and transferring data**

To protect your data, we use measures that include encryption for data transmission (SSL encryption), firewalls, hacker defence programs, and other.



We use certain service providers to handle our services, to communicate with members, and to manage our online presence. We certify that we have selected these service providers carefully to ensure that the data is processed lawfully and securely. In addition, we have also obligated the service providers to use your personal data only according to our instructions for specific purposes and in accordance with the relevant laws of the United Arab Emirates that pertain to the protection of personal data, privacy of the individual or family life of individuals. Any other use of the data by these service providers is excluded.

We operate internationally. Our business activities, management structures, and our technical infrastructure transcend national borders. Therefore, we also transfer your personal data abroad. The transmission of your personal data to the member states of the European Economic Area, to Switzerland, and to other countries with adequate data protection requires no additional consent. However, if your personal data is to be transferred to countries other than those just mentioned, we will first ask for your separate consent.

We will not share your personal information with anyone other than the above-mentioned service providers, unless you have given us your express consent.

#### **8. Right of withdrawal, information, changing data and contact details**

**You have the option, at any time, to withdraw your consent regarding the future use of your personal data used on this website without stating a reason. By withdrawing your consent, we no longer shall have the right to use your data. If you wish to withdraw your consent, please send a written declaration (by letter or e-mail) to the following address:**

EliteClub International  
operated by  
GRAND ELITE GROUP PLC  
71-75 SHELTON STREET  
COVENT GARDEN  
WC2H 9JQ  
LONDON  
UNITED KINGDOM

E-mail: [info@grandeliteclub.com](mailto:info@grandeliteclub.com)  
<https://www.grandeliteclub.com/>

Please contact us at this address if you have any questions regarding the use of your personal data or if you wish to update or correct your data.