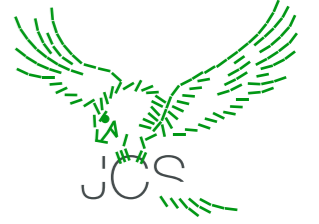


Data protection declaration



Data protection declaration



We do not assume any liability for external links to external contents, despite careful control of the contents. It is our concern to protect your personal data during the collection, processing and use on the occasion of your visit to our homepage. This is done by applying the legally binding requirements. Responsible body in the sense of the data protection laws see imprint. If you have any questions regarding data protection, rights or claims regarding your personal data, please send us an e-mail.

This data protection declaration clarifies the type, scope and purpose of the processing of personal data (hereinafter referred to as "data") within our online offering and the associated websites, functions and content as well as external online presences, such as our social media profile. (hereinafter jointly referred to as the "Online Offer"). With regard to the terms used, such as "processing" or "responsible", we refer to the definitions in Art. 4 of the Basic Data Protection Regulation (DSGVO).

— Responsible

JCS International Services GmbH, Am Obstgarten 48, 54317 Osburg, Germany

Owner: Claudia Schmittem and Jörg Schmittem

Managing Director: Jörg Schmittem

Phone: +49 160 944 00596

Mail: info@jcs-adventures.com

— Types of data processed:

- Inventory data (for example, names, addresses).
- Contact data (e. g. e-mail, telephone numbers).
- Content data (e. g. , text input, photographs, videos).
- Usage data (e. g. , websites visited, interest in content, access times).
- Meta/communication data (e. g. , device information, IP addresses).
- Categories of persons concerned visitors and users of the website
(in the following, we will also refer to the persons concerned collectively as „users“).

— Purpose of processing:

- Provision of the online offer, its functions and contents.
- Answer contact requests and communicate with users.
- Security measures.
- Reach measurement/Marketing.

— Terms used

"Personal data" means any information relating to an identified or identifiable natural person (hereinafter "subject"); a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier (e. g. a cookie) or to one or more specific characteristics which express the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, is regarded as identifiable.

"Processing" means any operation or set of operations which is carried out with or without the aid of automated processes and which involves personal data. The term reaches far and covers practically every handling of data. "Responsible" means any natural or legal person, public authority, agency or body which alone or jointly with others determines the purposes and means of the processing of personal data.

— Applicable legal basis

In accordance with Art. 13 DSGVO we inform you about the legal basis of our data processing. If the legal basis is not mentioned in the privacy statement, the following applies: The legal basis for obtaining consent is Art. 6 para. 1 lit. a) and Art. 7 DSGVO, the legal basis for processing to fulfil our services and carry out contractual measures as well as answer inquiries is Art. 6 para. 1 lit. b) DSGVO, the legal basis for processing to fulfil our legal obligations is Art. 6 para. 1 lit. c) DSGVO, and the legal basis for processing to safeguard our legitimate interests is Art. 6 para. 1 lit. f) DSGVO. In the event that vital interests of the data subject or another natural person make processing of personal data necessary, Art. 6 para. 1 lit. d) DSGVO serves as the legal basis. Cooperation with contract processors and third parties insofar as we disclose data to other persons and companies (contract processors or third parties) within the scope of our processing, transfer them to them or otherwise grant them access to the data, this shall only take place on the basis of legal permission (e. g. if a transfer of the data to third parties, such as payment service providers, pursuant to Art. 6 para. 1 lit. b) DSGVO is necessary for the performance of the contract), if you have consented to this, if a legal obligation provides for this or on the basis of our legitimate interests (e. g. when using agents, web hosts, etc.) (e. g. when using agents, web hosts, etc.). If we commission third parties with the processing of data on the basis of a so-called "order processing contract", this is done on the basis of Art. 28 DSGVO.

— Transfers to third countries

If we process data in a third country (i. e. outside the European Union (EU) or the European Economic Area (EEA)) or if this is done in the context of the use of third-party services or disclosure or transfer of data to third parties, this will only occur if it is done to fulfil our (pre)contractual obligations, on the basis of your consent, a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we process or allow the data to be processed in a third country only if the special requirements of Art. 44 ff. of the German Data Protection Act are met. Process DSGVO. This means that processing takes place, for example, on the basis of specific safeguards, such as the officially recognised establishment of a level of data protection equivalent to that of the EU or compliance with officially recognised specific contractual obligations (so-called "standard contractual clauses").



— Rights of data subjects

You have the right to request confirmation as to whether the data in question will be processed and to be informed of this data and to receive further information and a copy of the data in accordance with Art. 15 DSGVO. They have accordingly Art. 16 DSGVO the right to request the completion of data concerning you or the correction of incorrect data concerning you. Pursuant to Art. 17 DSGVO, you have the right to demand that the relevant data be deleted immediately or, alternatively, to demand a restriction on the processing of the data pursuant to Art. 18 DSGVO. You have the right to demand that we receive the data concerning you that you have provided to us in accordance with Art. 20 DSGVO and to demand that it be transferred to other responsible parties. Pursuant to Art. 77 DSGVO, they also have the right to file a complaint with the competent supervisory authority.

Right of revocation: You have the right to revoke any consent granted in accordance with Art. 7 para. 3 DSGVO with effect for the future right of revocation. You may at any time object to the future processing of the data concerning you in accordance with Art. 21 DSGVO. The objection may in particular be lodged against processing for the purposes of direct marketing.

— Cookies and right to object to direct advertising

"Cookies" are small files that are stored on the user's computer. Different data can be stored within the cookies. A cookie is primarily used to store information about a user (or the device on which the cookie is stored) during or after the user's visit to an online service. Temporary cookies, or "session cookies", or "transient cookies", are cookies that are deleted after a user leaves an online offer and closes his browser. The contents of a shopping basket in an online shop or a login jam, for example, can be stored in such a cookie. Cookies are referred to as "permanent" or "persistent" and remain stored even after the browser is closed. For example, the login status can be saved if users visit it after several days. The interests of the users can also be stored in such a cookie, which are used for range measurement or marketing purposes.

"Third-Party-Cookies" are cookies that are offered by other providers than the responsible person who operates the online service (otherwise, if they are only their cookies, one speaks of "First-Party Cookies"). We may use temporary and permanent cookies and explain this in our privacy policy. If users do not wish cookies to be stored on their computer, they are asked to deactivate the corresponding option in the system settings of their browser. Stored cookies can be deleted in the system settings of the browser. The exclusion of cookies can lead to functional restrictions of this online offer. A general objection to the use of cookies used for online marketing purposes can be raised for a large number of services, in particular in the case of tracking, via the EU website <http://www.youronlinechoices.com>. Furthermore, the storage of cookies can be achieved by switching them off in the browser settings. Please note that in this case not all functions of this online offer can be used.

— Deletion of data

The data processed by us will be deleted or their processing restricted in accordance with Art. 17 and 18 DSGVO. Unless expressly stated in this data protection declaration, the data stored by us will be deleted as soon as they are no longer required for their intended purpose and there are no legal obligations to retain them. If the data are not deleted because they are required for other and legally permissible purposes, their processing will be restricted. This means that the data will be blocked and not processed for other purposes. This applies, for example, to data that must be stored for commer-

cial or tax reasons. In accordance with legal requirements in Germany, the documents are stored in particular for 6 years in accordance with § 257 (1) HGB (German Commercial Code) (commercial books, inventories, opening balance sheets, annual financial statements, commercial letters, accounting records, etc.) and for 10 years in accordance with § 147 (1) AO (German Tax Code) (books, records, management reports, accounting records, commercial and business letters, documents relevant for taxation, etc.). According to legal requirements in Austria, the storage is carried out in particular for 7 years in accordance with § 132 (1) BAO (accounting documents, receipts/invoices, accounts, receipts, business papers, list of income and expenses, etc.), for 22 years in connection with real estate and for 10 years for documents in connection with electronically provided services, telecommunications, radio and television services which are provided to non-entrepreneurs in EU member states and for which the Mini One Stop Shop (MOSS) is used.

— Business-related processing

In addition, we process contract data (e. g. subject matter of contract, duration, customer category), payment data (e. g. bank details, payment history) of our customers, interested parties and business partners for the purpose of providing contractual services, service and customer care, marketing, advertising and market research.

— Hosting

The hosting services used by us serve the provision of the following services: Infrastructure and platform services, computing capacity, storage space and database services, security services and technical maintenance services which we use for the purpose of operating this online service. Here we, or our hosting provider, process inventory data, contact data, content data, contract data, usage data, meta and communication data of customers, interested parties and visitors of this online offer on the basis of our legitimate interests in an efficient and secure provision of this online offer in accordance with Art. 6 Para. 1 lit. f) DSGVO in conjunction with Art. 28 DSGVO (conclusion of contract processing agreement).

— Collection of access data and log files

We, or our hosting provider, collect data on each access to the server on which this service is located (so-called server log files) on the basis of our legitimate interests within the meaning of Art. 6 Para. 1 lit. f) DSGVO. The access data includes the name of the website accessed, file, date and time of access, amount of data transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider. Log file information is stored for security reasons (e. g. for the clarification of abuse or fraud actions) for the duration of maximally 7 days and deleted afterwards. Data, the further storage of which is necessary for evidence purposes, are excluded from deletion until the respective incident has been finally clarified.

— Provision of contractual services

We process inventory data (e. g. names and addresses as well as contact data of users), contract data (e. g. services used, names of contact persons, payment information) for the purpose of fulfilling our contractual obligations and



services pursuant to Art. 6 para. 1 lit b) DSGVO. The entries marked as mandatory in online forms are required for the conclusion of the contract. When using our online services, we store the IP address and the time of the respective user action. The storage is based on our legitimate interests, as well as the user's protection against misuse and other unauthorized use. This data will not be passed on to third parties unless it is necessary to pursue our claims or there is a legal obligation to do so pursuant to Art. 6 Para. 1 lit. c) DSGVO. We process usage data (e. g. the websites visited on our website, interest in our products) and content data (e. g. entries in the contact form or user profile) for advertising purposes in a user profile in order to display the user, e. g. product information based on the services they have previously used. The deletion of the data takes place after the expiry of statutory warranty and comparable obligations, the necessity of data storage is reviewed every three years; in the case of statutory archiving obligations, the deletion takes place after their expiry. Information in any customer account remains until its deletion.

— Contact us

When contacting us (e. g. via contact form, e-mail, telephone or via social media), the user's details will be processed for the purpose of processing the contact enquiry and processing it in accordance with Art. 6 Para. 1 lit. a) DSGVO. The user data can be stored in a customer relationship management system ("CRM system") or comparable inquiry organization. We will delete the requests if they are no longer necessary. We review the necessity every two years; furthermore, the statutory archiving obligations apply.

— Newsletter

With the following information we inform you about the contents of our newsletter as well as the registration, dispatch and statistical evaluation procedures and your rights of objection. By subscribing to our newsletter, you agree to the receipt and procedures described. Content of the newsletter: We send newsletters, e-mails and other electronic notifications containing advertising information (hereinafter "newsletter") only with the consent of the recipient or a legal permission. Insofar as the contents of the newsletter are specifically described within the framework of registration, they are decisive for the consent of the user. In addition, our newsletters contain information about our services and us. Double-Opt-In and logging: The registration to our newsletter takes place in a so-called Double-Opt-In procedure. This means that you will receive an e-mail after registration asking you to confirm your registration. This confirmation is necessary so that no one can register with external e-mail addresses. The registrations for the newsletter are logged in order to be able to prove the registration process according to the legal requirements. This includes storing the login and confirmation times as well as the IP address. Likewise the changes of your data stored with the dispatch service provider are logged.

If you subscribe to our newsletter, we will use the data required for this purpose or provided separately by you in order to send you our e-mail newsletter regularly on the basis of your consent pursuant to Art. 6 Para. 1 S. 1 lit. a) DSGVO.

Registration data: To subscribe to the newsletter, it is sufficient to enter your e-mail address. Optionally we ask you to enter a name in the newsletter in order to address you personally. Germany: The dispatch of the newsletter and the performance measurement associated with it is based on the consent of the recipients pursuant to Art. 6 para. 1 lit. a), Art. 7 DSGVO in conjunction with § 7 para. 2 no. 3 UWG or on legal permission pursuant to § 7 para. 3 UWG. The registrati-

on procedure is recorded on the basis of our legitimate interests pursuant to Art. 6 Para. 1 lit. f) DSGVO. We are interested in using a user-friendly and secure newsletter system that serves our business interests, meets users expectations, and allows us to provide evidence of consent.

Cancellation/revocation: You can cancel the receipt of our newsletter at any time, i.e. revoke your consent. You will find a link to cancel the newsletter at the end of each newsletter. We may store the unsubscribed email addresses for up to three years based on our legitimate interests before deleting them for newsletter purposes in order to provide evidence of prior consent. The processing of these data is limited to the purpose of a possible defense against claims. An individual deletion request is possible at any time, provided that the former existence of a consent is confirmed at the same time.

— Newsletter provider

The newsletter will be sent by Mailchimp (www.mailchimp.com). The provider is Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA. You can view the data protection regulations of the shipping service provider here: https://mailchimp.com/legal/privacy/?_ga=2.148693047.1642516058.1540152438-1263841573.1540152438.

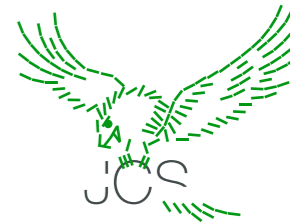
MailChimp is a service with which the sending of newsletters can be organized and analyzed. If you enter data for the purpose of subscribing to the newsletter (e. g. e-mail address), these will be stored on the servers of MailChimp in the USA. MailChimp is certified according to the "EU-US-Privacy-Shield". The "Privacy Shield" is an agreement between the European Union (EU) and the USA which is intended to ensure compliance with European data protection standards in the USA.

With the help of MailChimp we can analyze our newsletter campaigns. When you open an e-mail sent with MailChimp, a file contained in the e-mail (so-called web beacon) connects to the servers of MailChimp in the USA. In this way it can be determined whether a newsletter message has been opened and which links have been clicked. Technical information is also recorded (e. g. time of access, IP address, browser type and operating system). This information cannot be assigned to the respective newsletter recipient. They are used exclusively for statistical analysis of newsletter campaigns. The results of these analyses can be used to better tailor future newsletters to the interests of recipients.

If you don't want MailChimp to analyze you, you have to unsubscribe from the newsletter. For this purpose we provide a corresponding link in every newsletter message. You can also unsubscribe from the newsletter directly on the website.

Data processing is based on your consent (Art. 6 para. 1 lit. a) DSGVO). You can revoke this consent at any time by unsubscribing the newsletter. The legality of the data processing operations that have already taken place remains unaffected by the revocation.

The data that you have stored with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter and will be deleted both from our servers and from MailChimp's servers after you cancel the newsletter. Data stored by us for other purposes remain unaffected by this.



For more information, please refer to MailChimp's privacy policy at: <https://mailchimp.com/legal/terms/>.

Conclusion of a data processing agreement: We have concluded a so-called "Data Processing Agreement" with MailChimp, in which we commit MailChimp to protect the data of our customers and not to pass it on to third parties. This contract can be viewed at the following link: <https://mailchimp.com/legal/forms/data-processing-agreement/sample-agreement/>.

— Google Analytics

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer in the sense of Art. 6 Para. 1 lit. f. of the German Civil Code), we act in accordance with the following principles (DSGVO) Google Analytics, a web analysis service of Google LLC ("Google"). Google uses cookies. The information generated by the cookie about the use of the online offer by the user is usually transferred to a Google server in the USA and stored there. Google is certified under the Privacy Shield Agreement and thereby offers a guarantee of compliance with European privacy laws (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>). Google will use this information on our behalf to evaluate the use of our online services by users, to compile reports on the activities within this online service and to provide us with other services associated with the use of this online service and the Internet. Pseudonymous user profiles of the users can be created from the processed data. We only use Google Analytics with IP anonymization enabled. This means that the IP address of the user is shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases is the full IP address transmitted to a Google server in the USA and shortened there. The IP address transmitted by the user's browser is not merged with other Google data. Users may refuse the use of cookies by selecting the appropriate settings on their browser, they may also refuse the use of cookies by selecting the appropriate settings on their browser, they may refuse the collection of information by Google regarding the use of cookies and the processing of such information by Google by selecting the appropriate settings on their browser, and they may refuse the use of cookies by selecting the appropriate settings on their browser, and they may refuse the use of cookies by selecting the appropriate settings on their browser, and by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

For more information about Google's use of data and about setting and objection options, please visit the following Google webpages: <https://www.google.com/intl/en/policies/privacy/partners> ("Use of data by Google when using the websites or apps of our partners"), <https://policies.google.com/technologies/ads?hl=en> ("Use of data for advertising purposes"), <http://www.google.com/settings/ads> ("Manage information Google uses to display advertising"). Google-Re/Marketing-Services: On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer in the sense of Art. 6 Para. 1 lit. f. DSGVO) the marketing and remarketing services ("Google Marketing Services") of Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google is certified under the Privacy Shield Agreement and thereby offers a guarantee of compliance with European privacy laws (<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>). Google's marketing services allow us to display advertisements for and on our website in a more targeted manner to show users only ads that potentially match their interests. If, for example, a user is shown ads for products in which he is interested on other websites, this is referred to as "remarketing".

For these purposes, when you visit our and other websites on which Google marketing services are active, Google directly executes a code from Google and incorporates so-called (re)marketing tags (invisible graphics or code, also known as "web beacons") into the website. With their help, an individual cookie, i.e. a small file, is stored on the user's device (comparable technologies can also be used instead of cookies). The cookies can be set by various domains, including google.com, doubleclick.net, invitemediamedia.com, admeld.com, googlesyndication.com or googleadservices.com. In this file it is noted which websites the user visits, which contents he is interested in and which offers he has clicked, furthermore technical information about the browser and operating system, referring websites, visiting time as well as further information about the use of the online offer. The IP address of the user is also recorded, whereby we inform within the scope of Google Analytics that the IP address within member states of the European Union or in other contracting states of the Agreement on the European Economic Area is shortened and only in exceptional cases completely transmitted to a Google server in the USA and shortened there. The IP address is not merged with user data within other Google offers. The above information may also be linked by Google to such information from other sources. If the user subsequently visits other websites, the ads tailored to the user's interests can be displayed. User data is processed pseudonymously within the framework of Google marketing services. I. e. Google does not store and process the name or e-mail address of the user, but processes the relevant data cookie-related within pseudonymous user profiles. This means that, from Google's point of view, the ads are not administered and displayed for a specifically identified person, but for the cookie holder, regardless of who this cookie holder is. This does not apply if a user has expressly permitted Google to process the data without this pseudonymisation. The information Google Marketing Services collects about users is transmitted to Google and stored on Google's servers in the United States. One of the Google marketing services we use is the online advertising program "Google AdWords". In the case of Google AdWords, each AdWords customer receives a different "conversion cookie". Cookies can therefore not be tracked via the websites of AdWords customers. The information collected through the cookie is used to generate conversion statistics for AdWords customers who have opted for conversion tracking. AdWords customers see the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, you will not receive any information that personally identifies users. We may use the Google marketing service "AdSense" to include advertisements from third parties. AdSense uses cookies to enable Google and its partner sites to serve ads based on users' visits to this site or other sites on the Internet. We may also use the "Google Tag Manager" to integrate and manage the Google analytics and marketing services into our website. You can find out more about Google's use of data for marketing purposes on the overview page: <https://www.google.com/policies/technologies/ads>, Google's privacy policy can be found at <https://www.google.com/policies/privacy>. If you wish to opt out of interest-based advertising through Google Marketing Services, you may use the opt-out and setting options provided by Google: <http://www.google.com/ads/preferences>.

Online presences in social media: We maintain online presences within social networks and platforms in order to be able to communicate with customers, interested parties and users active there and to inform them about our services. When calling up the respective networks and platforms, the terms and conditions and the data processing guidelines of their respective operators apply. Unless otherwise stated in our data protection declaration, we process the data of users who communicate with us within social networks and platforms, e. g. post articles on our online presence or send us messages.

Objection to data collection: Alternatively, especially on mobile devices, you can prevent Google Analytics from capturing data by visiting our website „www.jcs-adventures.com“ and clicking on „Disable Google Analytics“ at the bottom of it. Then an Opt-Out-Cookie is set, which prevents the future collection of your data.



— Google Web Fonts

This page uses so-called web fonts provided by Google for the uniform display of fonts. The Google Fonts are installed locally. A connection to Google servers does not take place.

— Google Maps

This page uses the Google Maps map service via an API. Provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

To use the functions of Google Maps, it is necessary to store your IP address. This information is usually transferred to a Google server in the USA and stored there. The provider of this site has no influence on this data transfer.

Google is certified according to the so-called "Privacy Shield" (list entry). Google guarantees an adequate level of data protection.

The use of Google Maps is in the interest of an appealing presentation of our online offers and an easy retrievability of the places indicated by us on the website. This constitutes a legitimate interest within the meaning of Art. 6(1)(f) DSGVO.

You can find more information about the handling of user data in Google's privacy policy: <https://policies.google.com/privacy>

— Using Facebook Social Plugins

On the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer in the sense of Art. 6 Para. 1 lit. f. of the German Civil Code), we make use of the information provided on this website. DSGVO) Social Plugins ("Plugins") of the social network facebook.com, which is operated by Facebook Ireland Ltd. , 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"). The plugins can display interaction elements or content (e. g. videos, graphics or text contributions) and are recognizable by one of the Facebook logos (white "f" on a blue tile, the terms "like" a "thumbs up" sign) or are marked with the addition "Facebook Social Plugin". The list and appearance of the Facebook Social Plugins can be seen here: <https://developers.facebook.com/docs/plugins/>. Facebook is certified under the Privacy Shield Agreement and thus offers a guarantee of compliance with European data protection law (<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>). When a user calls a function of this online service that contains such a plugin, his device establishes a direct connection with the Facebook servers. The content of the plugin is transmitted directly from Facebook to the user's device and integrated into the online offer by the user. User profiles can be created from the processed data. We therefore have no influence on the extent of the data that Facebook collects with the help of this plugin and therefore inform the user according to our state of knowledge. By integrating the plugins, Facebook receives the information that a user has called up the corresponding page of the online offer. If the user is logged in to Facebook, Facebook can assign the visit to his Facebook

account. When users interact with the plugins, e. g. by clicking the Like button or commenting, the corresponding information is transferred directly from your device to Facebook and stored there. If a user is not a member of Facebook, it is still possible for Facebook to know and store their IP address. According to Facebook, only an anonymous IP address is stored in Germany. The purpose and scope of the data collection and the further processing and use of the data by Facebook as well as the related rights and setting options to protect the privacy of users can be found in Facebook's data protection information: <https://www.facebook.com/about/privacy/>. If a user is a Facebook member and does not want Facebook to collect data about him or her via this online service and link it with his or her member data stored on Facebook, he or she must log out of Facebook and delete his or her cookies before using our online service. Further settings and objections to the use of data for advertising purposes are possible within the Facebook profile settings: <https://www.facebook.com/settings?tab=ads> or via the US page <http://www.aboutads.info/choices/> or the EU page <http://www.youronlinechoices.com/>. The settings are platform-independent, i.e. they are adopted for all devices, such as desktop computers or mobile devices.

JCS International Services GmbH

Status: November 1, 2018

