



Flughafen München GmbH | P.O. Box 23 17 55 | 85326 Munich

VipWing Terminal  
Protocol and Business Lounges  
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Fax: +49 89 975 2 13 36  
[vipwing@munich-airport.de](mailto:vipwing@munich-airport.de)

## Information on data protection

### 1. Introduction

This information relates to collecting and processing of personal data in connection with service requests submitted to VipWing.

When a third party applies the VIP service for a guest, the applicant has to ensure to receive the guests' confirmation to save special categories of personal data.

### 2. Responsible for content

Flughafen München GmbH (business address: Nordallee 25, 85356 München-Flughafen, Email: [vipwing@munich-airport.de](mailto:vipwing@munich-airport.de))

### 3. Data Protection Officer

The Data Protection Officer of Flughafen München GmbH, Nordallee 25, 85356 München-Flughafen,  
email: [datenschutzbeauftragter@munich-airport.de](mailto:datenschutzbeauftragter@munich-airport.de)

### 4. Processing of personal data, purpose of processing

Your data will be processed solely for the following purposes:

- Recording and implementing the available services
- Implementation of all official measures required for offering and performing VipWing services
- Providing information on the services of VipWing
- Issuing the invoice
- Defense of legal claims



## 5. Legal basis for the processing of personal data

- Consent of the data subject [Art. 6 Par. 1 sentence 1 a) of the EU General Data Protection Regulation (GDPR)]
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract [Art. 6 Par. 1 sentence 1 b) GDPR].
- Legitimate interests [Art. 6 Par. 1 sentence 1 f) GDPR] Defense of legal claims

## 6. Recipient

- Internal recipients: Employees of the relevant specialized departments
- External recipients: The airline concerned and/or service providers acting on its behalf, the applicant and the invoice recipient, the responsible authorities (e.g. Federal Police, Customs, etc.), accounting service providers, and any other service providers involved.

## 7. Transfer to third countries

Data will be transferred to a third country outside the European Union for invoicing purposes if the invoice recipient is located in a third country. This is permitted under data protection laws, as the requirements pursuant to Art. 44 ff. GDPR are met. This applies in particular if an adequacy decision applies or if appropriate guarantees are made [such as the signing of a standard data protection clause or binding corporate rules on the part of the provider]. In the absence of an adequacy decision or appropriate guarantees, Art. 49 Par. 1 sentence 1 c) of the GDPR shall apply.

## 8. Duration of storage

The data will be deleted three years after your last visit. This enables us to maintain the quality of our services and answer any follow-up questions.  
Personal data related with the invoice will be kept for 10 years based on legal retention period.

## 9. Collection of visitors' contact details in order to help fight the corona pandemic

### 9.1. Contact details, date

In accordance with the statutory regulations, we are required to collect your contact details (given name, family name, the date and period when you visited, your address or alternatively your telephone number or e-mail address) on a form so



that people who have come into contact with a person infected with the coronavirus can be traced by the authorities. Please note that you may not enter or use the lounge area if you have not provided your contact details or do not consent to having this data recorded. We do not use the data provided by you in this connection for any purpose other than specified in this paragraph, and we comply with the requirements of data protection as a matter of course.

## 9.2. Purpose and legal grounds for the data processing

Purpose: To be able to trace COVID-19 infections.

The legal grounds for processing the data are provided by Article 6[1] [d] of the General Data Processing Regulation (processing of personal data in order to protect the vital interests of the data subject or of another natural person). This also includes the processing of personal data in order to monitor epidemics and their spread.

Other legal grounds for processing the data are provided by Art. 6[1] [c] of the GDPR in conjunction with Section 13[4] sentence 3 of the Sixth Bavarian regulation on interventions to prevent infection and with section 3.2.3 and section 3.2.9 of the Hygiene concept for catering facilities ([joint announcement of the Bavarian State Ministries for Health and Care and for Economic Affairs, Regional Development and Energy of May 14, 2020, GZ6a-G8000-2020/122-315](#); published in the Bavarian Ministerial Gazette [BayMBI.] 2020 no. 270 of May 14, 2020). These regulations require the owner of a catering outlet to collect and process the data.

## 9.3. Recipients of the contact details that are collected

The data, which are collected separately, may be disclosed exclusively on the request of the competent health authorities in order to trace possible paths of infection.

## 9.4. Duration of storage

The contact details will be stored for a period of one month and then destroyed.

## 9.5. Important information

### 9.5.1. Health data

The collection of particularly sensitive health data is **not required** for identifying contact persons in accordance with the statutory regulations. Please therefore do not provide data of this kind, we do not need these data.

If in very occasional exceptional circumstances you provide health data, such as food tolerances, etc., on the form without being asked to do so, please note that these data will be used in the same way as described here.

The sole exception is the recipients specified in 9.3. Data that is not required will not be disclosed to these recipients.



### 9.5.2. Further information

The contents listed in point 9 are based on a template of the Bavarian State Office for Data Protection Supervision (BayLDA) for collecting contacts of Covid-19 cases and complies with the requirements of the [Sixth Bavarian regulation on interventions to prevent infection \(6th BayLfSMV\) of June 19, 2020](#) as well as the Hygiene concept for catering facilities in accordance with the [joint announcement of the Bavarian State Ministries for Health and Care and for Economic Affairs, Regional Development and Energy of May 14, 2020, GZ6a-G8000-2020/122-315](#)].

## 10. Data protection requests: Rights of the concerned parties to information, rectification, erasure, restriction of processing, objection, portability and withdrawal of consent.

Data subjects have rights to information on the personal data concerned, rectification, erasure, restriction of processing, objection to processing and portability of the data. In addition, data subjects have the right to withdraw a declaration of consent at any time.

**VipWing data protection enquiries:** To exercise rights related to requests for VipWing services, the party submitting the request can initiate contact, preferably by email at the following address:

[vipwing@munich-airport.de](mailto:vipwing@munich-airport.de).

**Rectification of data:** In particular in case of changes or errors in the indicated data of the party submitting the request, the data subject can have the data rectified. Contact in such cases can be made as described by email at [vipwing@munich-airport.de](mailto:vipwing@munich-airport.de).

**General data protection enquiries:** To exercise other rights, please contact the following email address:

[datenschutzanfrage@munich-airport.de](mailto:datenschutzanfrage@munich-airport.de).

## 11. Right to submit complaints to the supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you violates the law. The supervisory authority in the state of Bavaria responsible for the non-public area of the airport is: The Bavarian State Office for Data Protection Supervision, Ansbach.



## **12. Obligation to provide personal data**

The registration for VipWing services is a quasi-contractual legal relationship; the provision of data is necessary for delivering the services in question.

## **13. Automated decision making (including profiling) and the consequences**

No automated decision making is carried out.

## **14. Reference to further information**

Additional information on data protection can be found in the General Privacy Statement of Flughafen München GmbH under the following link: <https://www.munich-airport.com/privacy-policy-376755>

## **15. Status of this information: July 30, 2020**