



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

Common User Lounges

Airport Lounge World - Phone +49 89 975 2 13 24

Airport Lounge Europe - Phone +49 89 975 2 13 23

culmanagement@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 Common User Lounges.

2. Responsible for content

Flughafen München GmbH (business address: Nordallee 25, 85356 München-Flughafen, Email: culmanagement@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

4. Processing of personal data, purpose of processing

Your data will be processed solely for the following purposes:

- Collection of data for access control (name matching)
- For billing

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) access control, enforcement of claims as well as documentation



6. Recipient

- Internal recipients: Employees of the relevant specialized departments
- External recipients: The airline concerned or the service provider acting on its behalf, tour organizers, issuers of [bonus] card programmes or other companies with lounge access agreements.

7. Transfer to third countries

To book or obtain access authorization through a provider in a third country outside the European Union, data is transferred to this provider for invoicing purposes. 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 personal data will be deleted from the access management system six months after the last visit.

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

In order to fulfill the statutory requirements for the collection of our guests' contact details for the purpose of combating the coronavirus pandemic, we offer two different alternatives that we would like to inform you of:

- Analog collection of contact details on paper / using forms
- Digital collection of contact details with the help of the luca app of the service provider engaged for this purpose

The following information on the processing of contact data is labeled as applicable to analog processing on paper / using forms or digital processing with the help of the Luca app.

9.1. Processing of personal data

9.1.1. Analog processing on paper / using forms

In accordance with the statutory regulations, we are required to collect your contact details [given name, family name, your address, the date and period when you visited as well as secure contact information either 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.

9.1.2. Digital processing via luca app

In order to fulfill our documentation obligations and provide support for contact tracing for COVID-19 infections, we collect your personal data when you check in to our location. This check-in and the associated transfer of your personal data to us will preferably be carried out via the service "luca" in one of the following forms:

- Use of the luca app
- Use of the luca web app

The responsible staff of the Common User Lounges scans the QR code of the visitors "luca-app" [QR code generated and shown in the own device of the lounge guest].

We may process the following elements of your data, which are necessary in order to ensure that tracing is possible:

- **Contact details:** Last name, first name, address, telephone number or e-mail address.
- **Layover data:** Name/designation of restaurant operators, event organizers and other businesses you have visited during your layover as well as the date of your layover, the beginning and end times of your layover and the address for your layover. When leaving the Common User Lounges, the staff asks the visitors to sign out in their luca-app ["check-out"]. In addition, the staff checks this afterwards and otherwise takes over the process in the operator app [display of guest lists]. Geofencing is not actively used by Munich Airport [setting "Operator" app].
- **Additional input data:** Other information you submit via input fields in the luca application, such as your desk number.
- **Functional data:** Data assignment ID, key codes and QR codes.
- **Temporary usage data:** Data which may be temporarily collected when using the luca app, i.e. IP address, IP location, type and version of browser used and browser plug-ins installed, information on the mobile network used, time zone settings, operating system and platform.

As a general rule, user data is stored in encrypted form when the luca system is used, with the result that confidential user information in unencrypted form is held only by the user. As such, we are normally unable to trace whether the personal data of a specific person is being processed in the luca system. However, please note that all data is erased from the luca system at regular intervals.

All users of the luca app can view all forms of processing which have been used for data which has been collected and stored in encrypted form in their own history and their own contact details.



When using the luca app, personal data is secured with encryption technology based on keys which are generally held exclusively by the luca app on your device. Without this key, we are unable to associate the aforementioned data with you and thus unable to delete it. This being the case, however, this data is erased from our system after 14 days and is automatically erased from the luca system on an annual basis.

We also delete your data as soon as you remove it with the erase function in the luca app and once any applicable mandatory legal retention periods have expired. In the event that we have stored data about you that we can associate with you or which is not based on the information you have entered in the luca app, we will erase this data in accordance with your request.

Please note that as a general rule, we only process your personal data in encrypted form and not as plain text; as such, we are unable to fulfill corresponding requests from you in regard to the aforementioned rights in certain cases

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 the respective valid version of the Bavarian regulation on interventions to prevent infection, Section 28a [4] of the Law on the Prevention of Infection, and with the regulations of the respective valid version of the framework concept for catering facilities (<https://www.stmgp.bayern.de/corona-virus/rechtsgrundlagen>). 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

9.3.1. Analog via paper / using forms

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.

9.3.2. Digital processing via luca app

The luca system is operated by culture4life GmbH. Its subcontractors are providers of software maintenance and software operation services as well as providers of IT infrastructure services. An agreement on commissioned data processing is in place between us and culture4life GmbH. The specified recipients and subcontractors may not use your personal data in any manner other than for the purpose of fulfilling documentation obligations and providing support for contact tracing on



our behalf. In addition, we may release your personal data to health authorities in order to enable tracing.

Data will not be transmitted to third countries or international organizations.

9.4. Duration of storage

The contact details will be stored for a period of one month and then destroyed [analog processing via paper/forms] or erased in conformity with the applicable data protection provisions [digital processing via luca app].

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 respective valid version of the Bavarian regulation on interventions to prevent infection [BayIfSMV] and the respective valid version of the framework concept for catering facilities of the Bavarian State Ministries for Economic Affairs, Regional Development and Energy, and Health and Care [<https://www.stmgp.bayern.de/coronavirus/rechtsgrundlagen>].

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.

Data protection enquiries on Common User Lounges requests: To exercise rights related to requests for Common User Lounges, the party submitting the request can initiate contact, preferably by email at the following address:

culmanagement@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 culmanagement@munich-airport.de.

General data protection enquiries: To exercise other rights, please contact the following email address:
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 a Common User Lounge 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: June 23, 2021