

To whom it may concern

Zell am See, Mar 14<sup>th</sup>, 2018

Dear Hetras customer!

As you probably know, EU General Data Protection Regulation (known widely and referred further as "GDPR") will become enforceable from May 25<sup>th</sup>, 2018. We understand that this will bring significant changes to the way companies operate and treat employee and consumer personal data, and this hugely affects the travel industry as well.

As we all are not only representing vendors and hotel organizations but also natural persons we welcome this focus on personal data security for our own future. As such, we - as individuals and as a company – embrace wide reaching standards like GDPR in the EU and other countries as they are adopting GDPR or its principles.

As such, please let me inform you about the steps that we are taking in the next months to ensure GDPR compliance for our Hetras product:

1. GDPR defines certain roles in the data processing activities, in particular the role of the data controller (which is role of our customers) and the processor (which is our role). It also describes relation between these roles. Considering Chapter 4 of the GDPR we decided that all existing and future customers of Hetras will need to sign an updated GDPR compliant data processing agreement ("DPA"), which outlines exactly what personal data is processed, stored and shared for what purpose. This DPA also means that you, our customer, and Shiji Deutschland GmbH will enter a legal data controller – data processor relationship, which will govern the responsibilities for both parties.
2. The DPA will also outline the physical data storage locations and protections, as well as legal grounds to store personal data there.
3. We plan to implement a number of functional changes within the Hetras platform (both API and UI) to fulfill GDPR consumer rights, Data Protection Officer (DPO) requirements and implementing best practices to limit the personal data exposure.
4. Based on the DPA, we will work towards implementing a consent strategy for both employees' and guests' personal data:
  - a. For employees: respective clauses for data processing within Hetras and organizational & communication requirements for both data controller and processor.
  - b. Similar for guests: a consent strategy for loyalty- and non-loyalty guests, including assumptions for the Terms & Conditions of the data controller, which will include (amongst others):
    - i. Cross-border processing
    - ii. Last name / first name only replication
    - iii. Data searching, aggregation and profiling
5. In order to communicate our GDPR compliance for the Hetras product, we will do a respective internal assessment and audit, which will document our GDPR compliance including the DPA (legal basis) to our customers. Certainly, we will share this internal audit results with you, so that you can complete the audits on your side respectively.

6. As technologies and legal understandings develop (including the effect on other countries and legislations), our intent is to continuously update our GDPR compliance and share with our customers.

I hope that this gives a high-level understanding of our approach towards GDPR and we will get back to you in April with the respective DPA drafts and expected detailed changes on the Hetras usage – both on API and User Interface level. As we jointly move towards implementing GDPR, we will also implement a GDPR Q&A on our Hetras website for efficient communication.

If you have any further questions, please reach out to [gdpr@hetras.com](mailto:gdpr@hetras.com).

Best regards,

A handwritten signature in blue ink, appearing to be 'MH', with a long horizontal stroke extending to the right.

Michael Heinze

Managing Director  
ppa, Shiji Deutschland GmbH