



---

## Information on data collection in accordance with Article 13 GDPR

### PRIVACY POLICY

Inner Journey GmbH, Glärnischstrasse 15, 8712 Stäfa, Switzerland

We are pleased that you are interested in our offers. Since we are very concerned about the protection of your privacy and your personal data, the collection and use of your data is therefore always in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 (GDPR) and the relevant provisions. In the following document, we inform you what kinds of data are collected by us and how we process that data.

#### 1. Who is responsible for your personal data?

Where these terms refer to "company," "we," "us," or "controller," this refers to the following:

We, Inner Journey SIA, Glärnischstrasse 15 in 8712 Stäfa, Switzerland, Telephone: +41 79 918 80 88, Email: [info@innerjourney.ch](mailto:info@innerjourney.ch), [www.innerjourney.ch](http://www.innerjourney.ch), Commercial Register Switzerland (Zefix); Registration number: UID: CHE-413.724.090 (hereinafter "Company", "we", "us" or "Responsible") is responsible under this Privacy Policy for the collection and processing of personal data of Users and / or Customers.

As our registered office is located in Switzerland, we are subject to applicable Swiss laws. We comply in particular with the provisions of the General Data Protection Regulation (EU) 2016/679 ("GDPR").

Your personal data will be processed and stored by us in the manner described below and for the purposes set out below.

#### 2. Collection and storage of personal data as well as nature and purpose and their use

The personal data collected on the basis of a travel registration or request from you will be used exclusively for the processing of the travel (contract processing) and for customer service (§ 6 and § 7 General Data Protection Regulation).

When you visit our website and use our booking service (as a "user") or use our services (as a "customer"), we collect the following categories of your personal information:



## 2.1. Personal data provided by you

Personal data within the meaning of the GDPR consists of all information relating to an identified or identifiable natural person; a natural person is regarded as identifiable, which can be identified directly or indirectly, in particular by association with an identifier such as a name, an identification number, location data, an online identifier or one or more special features, the expression of the physical, physiological, genetic, mental, economic, cultural or social identity of this natural person. Storage of personal data is only to the extent necessary to provide the booked service, to comply with legal requirements, or for the purposes stated below.

### a. We collect the following data:

The personal information that you provide us when you register a trip with us and that you provide when you use our registration portal to register the trip, including the information that you provide us with by email during the booking process.

Such as:

salutation,  
first name,  
last name,  
date of birth,  
email address,  
address,

telephone number (landline and / or mobile),

A photocopy of an identity card that can be identified as a copy, including personal data such as name, photo, serial number or passport number, signature, address or machine-readable zone, nationality

The ID card may only be used by the owner or other persons with the consent of the owner. The photocopy must be recognizable as a copy. The legislator recommends that the photocopy be created in monochrome levels (e.g. black and white) or that the reference "copy" be made on the photocopy. This can also be done after creating the photocopy. Specific categories of personal information, such as information about your state of health or your religious orientation, which you voluntarily indicate at

All personally identifiable information you give us when registering and making the booking must be accurate and accurate. This includes, for example, that we always have your correct contact information (including e-mail address).

- If you intend to disclose your personal information to a third party, for example, if you make a booking on your behalf, that information must be provided with the consent of that third party and in full knowledge of this Privacy Policy.
- Please note that we only collect the data of children if they have been provided by the parents or guardians or with their consent. If we become aware that we have collected the



---

information of a child without the consent of a parent or guardian, we reserve the right to delete it.

#### **b. Anonymous data / log files / IP address**

You can visit our website without us having to collect personal data. Each time you visit our website, certain anonymous data is still stored, e.g. which page or which offer was chosen. However, this data is not personal and therefore does not fall under the statutory provisions of the GDPR.

The website operator or page provider collects data about accesses to the site and saves them as "server log files". The following data is logged:

Website visited, time of access, amount of data sent in bytes, source / reference from which you came to the page, browser used, operating system used, IP address used. The data collected are for statistical purposes only and to improve the website. However, the website operator reserves the right to check the server logfiles retrospectively, if specific indications point to illegal use.

A survey of anonymous data is done solely for statistical evaluation in order to improve our offers. Please note the point "right to information / right of revocation".

To the extent permitted by law, we may receive additional information about you, such as fraud detection and warning, third-party service providers and / or partners as part of our fraud prevention measures.

the time of booking by entering a box in the health status, or enter it in any other field, such as by telephone at our customer service, in the telegram chat or during the booking process by email. We use these special categories of personal information in accordance with specific legal protections and only when absolutely necessary to respond to your request and / or provide our services as part of a booking.

### **2.3 Purpose of collecting personal data**

#### **a. We collect your data for the purpose:**

- of the contract execution
- the fulfilment of our contractual and pre-contractual obligations
- The provision of the above-mentioned personal data is, where requested, necessary for the proper provision of contractual services between us and you and enables us to comply with legal or contractual requirements. Without this information, we may not be able to provide the requested services (such as attending a pilgrimage).
- However, the collection of personal data becomes indispensable if you wish to use our online presence to book travel services (such as a pilgrimage) or other services, if you wish to contact us, or you want to use other offers on our site, for which processing of personal data is indispensable. This includes, in particular, the administration of your data in a personal customer area with log-in function, or the change to existing bookings or orders.



- Temporary storage of the IP address by the system is necessary to allow delivery of the website to the user's computer. To do this, the user's IP address must be kept for the duration of the session. In addition, storage in log files is carried out to ensure the functionality of the website. Also, the data is used to optimize the website and to ensure the security of our information technology systems. An evaluation of the data for marketing purposes does not take place in this context. For these purposes, our legitimate interest in the processing of data according to Art. 6 para. 1 lit. f GDPR.
- In the case of booking a travel service or other services, the data collected here will be used for the processing of this booking and within the statutory provisions for advertising purposes and for statistical purposes.
- We also use the personal data stored by us for the care of customer relations, for customer care (e.g., information on the expiry of your stay, information on passport, visa and health regulations of the respective country of entry, information on travel services, tour schedule), for the execution of their own advertising and marketing measures (e.g., the sending of catalogues or other advertising mailings within the legally permissible framework, queries regarding customer satisfaction) and order processing.

#### Why?

- To fulfil the contractual relationship and to provide you with the agreed service at all times and with all possible changes and modifications (e.g. making your bookings and accepting payments, answering your requests, managing your account).
- In the event that you call us and do not reach us or your call is interrupted, you give us permission to call you back to handle your request.
- To send you e-mail, telephone, or text message information related to the contractual relationship, including any communications regarding any such modifications.
- For the fulfilment of a contract or for measures related to a contract.
- To comply with legal and regulatory requirements and government regulations, and to respond to inquiries from government or law enforcement agencies as part of an investigation.

#### On what legal basis?

With your express consent for this purpose, you, as independent data controllers, authorize the Inner Journey Ltd., Glärnischstrasse 15 in 8712 Stäfa, Switzerland, Telephone +41 79 918 80 88, E-Mail: [datenschutz@innerjourney.ch](mailto:datenschutz@innerjourney.ch), [www.innerjourney.ch](http://www.innerjourney.ch), Commercial Register Switzerland (Zefix); Registration number: UID: CHE-413.724.090 (to process your data for the purposes already mentioned. For the avoidance of doubt and for this specific purpose, the person responsible and BhaktiMarga Event GmbH act as independent controllers of the data processing and therefore process your data separately and independently of each other.

- Where you give your consent (by marking the appropriate checkbox)

#### Why?



- To verify compliance with our terms and conditions and to Assertion, exercise or defence of legal claims.
- To pursue our legitimate interests (i.e. Terms and conditions, protection of our rights in case of dispute or legal claims)
- Where you give your consent (i.e. through the process of the booking system like for example jotform, but also others like zoom, facebook, etc.)

### 3. Disclosure of personal data to third parties

#### 3.1. Who has access to your data and can use them where?

##### a. Categories of the recipients of your data

Insofar as this is required under Art. 6 para. 1 sent. 1 lit. b GDPR is required for the organization and settlement of the contractual relationship with you, your personal data will be passed on to third parties. The recipients of the data are public bodies and internal bodies involved in the execution of the respective business processes. A transfer of your personal data takes place exclusively within the relevant data protection and competition law requirements. We share your personal information for the purposes described in this Privacy Policy only if there is a legal basis with the following categories of recipients:

- Authorised employees and / or employees working in the areas of administration, products, legal advice, customer service and IT systems (personnel administration, accounting, banking / payment service providers, accounting, marketing, sales, technical processing of postal and e-mail dispatch, payment processing, customer service) to provide advice and assistance, as well as persons who are responsible for the maintenance of the network and the hardware and software used;
- Depending on the type and nature of the travel, it may be necessary for us in order to organize and process a booked trip that we provide personal information to service providers and authorities (transfer companies, bus transfer companies, insurance companies, tour operators, hotels, tour guides, local agencies, restaurants, immigration authorities, and other parties who cannot provide the requested services without providing your personal data). In addition, we work with selected external service providers to fulfil our contractual obligations. Please note that the data protection regulations at the headquarters of these persons and companies may differ from those in Germany. Insofar as this is necessary for the performance of the contractual service or legal obligations owed by us, the transfer of your data also takes place to sub-contractors or service providers for the performance of the service in the name or on behalf of us.
- Payment service providers and financial institutions (for example, for chargebacks, fraud detection and prevention) who act as independent controllers of the data.
- Our business partners in fulfilling the travel service. Competent authorities, if we are legally obliged to do so.



- 
- Competent authorities and law enforcement agencies when required to enforce our Terms of Use and defend our property rights or third party property rights.
  - Third parties (e.g. business consultants, business auditing, or goodwill valuers) who receive this information when it is necessary in connection with the sale of our business or assets (in which case, your information) to be disclosed to our and the potential buyers' advisers and forwarded to the new owners).
  - For pre-contractual approval of participation in the pilgrimage of a participant, the transfer is made to employees of Bhakti Event GmbH.
  - We also disclose and transmit your data to third parties, insofar as we are obliged to do so by law or on the basis of a legally-enforced legal procedure.
- 
- The photocopy of the ID card may only be provided by the cardholder to third parties, meaning even with the consent of the cardholder, no transfer to third parties may take place. Third parties are therefore persons who belong to the same organization. Therefore, in principle, a transfer of the photocopy can be carried out by the company, e.g. from department to department. Therefore, Inner Journey Ltd. never passes the photocopy of your ID / passport on to third parties. Since, of course, every ID card photocopy contains personal data, data protection regulations apply. For example, the name, the photo, the serial or access number, the signature, the address or the machine-readable zone will usually be recognizable when the ID card is being photocopied. Here is your data protection consent of the legal basis.
  - You have the right to receive personally identifiable information you provide to us in a structured, common and machine-readable format. You also have the right to transfer this data to another person without hindrance by the person responsible for providing the personal data
  - The comprehensive list of parties to which your personal information may be disclosed can be obtained upon request by emailing to [datenschutz@innerjourney.ch](mailto:datenschutz@innerjourney.ch).

#### **b. International transfer of your data**

Your personal data will be processed at the data controller's head office, in Inner Journey Ltd.'s servers, and at the offices of other companies to whom the data may be transferred to provide the services requested by the data controller.

A transfer of your personal data to third parties takes place in order to organize and process a booked trip. Depending on the type and destination of the trip, it may be necessary for us to provide personal data to service providers and authorities (transfer companies, bus transfer companies, insurance companies, tour operators, hotels, tour guides, local agencies, restaurants, immigration authorities, as well as other parties who, without receiving your personal Data cannot provide the requested services).

Data transfers to external contractual partners (for hotels, transit companies, etc.) in third countries arise only in the context of the fulfilment of the contract of pilgrimages for communication, as well as other exceptions expressly provided for in § 4c BDSG. As an



international travel company, we can only forward your personal data to the following within the limits permitted by law:

- Beneficiaries in countries outside the European Economic Area (EEA) who provide an adequate level of data protection, such as Switzerland, in line with the Commission's "Appropriateness Decisions" recognizing that some countries provide adequate protection;
- Beneficiaries in countries outside the European Economic Area where privacy laws may be less stringent than in the EEA. This happens when:
  - We share your information with independent data controllers, such as hotels, car rental companies, transfer service providers, tour operators, tour guides, etc., who can process your data outside the EEA to provide you with the requested services.
  - We will share your information with our contracted service providers who act as processors in our interest and who may be based in a country outside the EEA, including Mauritius and Israel. We ensure that such forwarding is also in accordance with this Privacy Policy and is governed by the standardized contractual clauses approved by the EU Commission to ensure an adequate level of data protection. Our subcontractors may be engaged, inter alia, in providing the service you request, processing your payment details, providing advertising and marketing services in our interest, and providing support services through electronic communications or call centers.

If you would like further information about the appropriate security measures, please contact us by e-mail at [datenschutz@innerjourney.ch](mailto:datenschutz@innerjourney.ch).

#### **c. Note on data transfer to the USA**

Tools from companies based in the USA are integrated into our website. When these tools are active, your personal data can be passed on to the US servers of the respective companies. We would like to point out that the USA is not a safe third country within the meaning of EU data protection law. US companies are obliged to surrender personal data to security authorities without you as the person concerned being able to take legal action against this. It cannot therefore be ruled out that US authorities (e.g. secret services) process, evaluate and permanently store your data on US servers for monitoring purposes. We have no influence on these processing activities.

#### **4. Legal basis for the processing of personal data**

Insofar as we obtain the consent of the data subject for processing of personal data, Art. 6 para. 1 lit. a EU General Data Protection Regulation (GDPR) as legal basis.

In the processing of personal data necessary for the performance of a contract of which the data subject is a party, Art. 6 para. 1 lit. b GDPR as legal basis. This also applies to processing operations required to carry out pre-contractual measures.

Insofar as the processing of personal data is required to fulfil a legal obligation that our company is subject to, Art. 6 para. 1 lit. c GDPR as legal basis.



In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 para. 1 lit. d GDPR as legal basis.

If processing is necessary to safeguard the legitimate interests of our company or a third party and if the interest, fundamental rights and fundamental freedoms of the person concerned do not prevail over the first interest, Art. 6 para. 1 lit. f GDPR as legal basis for processing.

Legal basis for direct mailing as a result of the sale of our goods or services is § 7 Abs. 3 UWG.

## 5. Your rights

You have the right:

pursuant to Art. 7 para. 3 GDPR to revoke your once-granted consent with us at any time. As a result, we are not allowed to continue the data processing based on this consent for the future;

in accordance with Art. 15 GDPR, to request information about your personal data processed by us. In particular, you can provide information on the processing purposes, the category of personal data, the categories of recipients to whom your data has been disclosed or the planned storage period, the right to rectification, deletion, limitation of processing or opposition, the existence of a the right to complain, the source of their data, if not collected from us, and the existence of automated decision-making including profiling and, where appropriate, meaningful information about their details;

in accordance with Art. 16 GDPR to demand the rectification of incorrect or completed personal data stored by us immediately;

in accordance with Art. 17 GDPR, to require the deletion of your personal data stored by us, except where the processing is for the exercise of the right to freedom of expression and information, for the fulfilment of a legal obligation, for reasons of public interest or for the assertion, exercise or defense of legal claims is required;

in accordance with Art. 18 GDPR to demand the restriction of the processing of your personal data, if the accuracy of the data is disputed by you, if the processing is unlawful, but you reject their deletion and we no longer need the data, but you need the data to assert, exercise or defense legal claims or you have objected to the processing in accordance with Art. 21 GDPR;

pursuant to Art. 20 GDPR to obtain your personal data that you have provided to us in a structured, standard and machine-readable format or to request that you send it to another person responsible for the transaction;

according to Art. 77 GDPR to complain to a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence or work or our company headquarters.



## 6. Routine deletion and blocking of personal data

We will process and store your personal information only for the period required to achieve the purpose of the storage, or as otherwise notified to you, or as otherwise required by law, regulation or regulation of the European Data Protection Act, or any other legislator.

If the storage purpose is omitted or if a storage period prescribed by the European directives and regulations or any other relevant legislature expires, the personal data will be routinely blocked or deleted in accordance with the statutory provisions.

## 7. Right of objection and withdrawal, information cancellation and rectification requests

You have the option at any time to revoke your consent to the processing of personal data with effect for the future and to have your personal data deleted or modified. If the data is required for the fulfilment of the contract or for the execution of pre-contractual measures, a premature deletion of the data is only possible as far as non-contractual or legal obligations preclude a deletion.

Information, rectification and cancellation requests as well as the revocation or the objection regarding the further use of the data of any given consent, can be submitted informally as follows:

by post: Inner Journey GmbH, Glärnischstrasse 15, 8712 Stäfa, Schweiz

via phone: +41 79 918 80 88

via E-mail: [datenschutz@innerjourney.ch](mailto:datenschutz@innerjourney.ch)

## 8. Contact details of the responsible person

The contact details of the person responsible for the data processing described here are as follows:

Elias Riedweg, Inner Journey Ltd., Glärnischstrasse 15 in 8712 Stäfa, Switzerland, Telephone +41 79 918 80 88, E-Mail: [info@innerjourney.ch](mailto:info@innerjourney.ch), [www.innerjourney.ch](http://www.innerjourney.ch), Commercial Register Switzerland (Zefix); Registration number: UID: CHE-413.724.090