

Privacy and Cookie Policy for Tir na Nóg ApS

Last updated: April 2026

At Tir na Nóg ApS, accessible from <https://www.tirnanog.dk>, we are committed to protecting your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and the Danish Data Protection Act.

This policy explains how we process your personal data and how we use cookies and similar technologies.

1. Data Controller

Tir na Nóg ApS
Frederiksgade 38–42
8000 Aarhus
Denmark
Email: info@tirnanog.dk

We are the data controller for the processing of your personal data.

2. Categories of Personal Data

We may process the following categories of personal data:

- Identification and contact data (name, email, phone number)
- Demographic data (e.g. date of birth, where relevant)
- Booking and visit data (reservations, preferences, visit history)
- Loyalty and marketing data (preferences, participation in campaigns)
- Communication data (emails, chatbot interactions)
- Technical data (IP address, browser type, device information, cookies, usage data)

3. How We Collect Your Data

We collect personal data when you:

- Visit our website
- Make a booking
- Use our chatbot
- Sign up for newsletters or marketing
- Participate in campaigns or loyalty programs
- Contact us

4. Purposes and Legal Basis for Processing

We process your personal data for the following purposes and based on the following legal grounds:

Booking and service delivery

- Purpose: Manage reservations and provide services
- Legal basis: Contract (GDPR Art. 6(1)(b))

Customer communication

- Purpose: Respond to inquiries and provide support
- Legal basis: Legitimate interest (Art. 6(1)(f))

Marketing and newsletters

- Purpose: To send newsletters, offers, and event updates
- Legal basis: Consent (GDPR Art. 6(1)(a))

As part of our marketing communications, you may receive up to three emails per month. These may include:

- A newsletter
- A “What’s On” overview of upcoming events
- Occasional emails related to special occasions, such as birthday greetings or promotions

You can withdraw your consent at any time by:

- Clicking the “unsubscribe” link included in our emails
- Contacting us at info@tirnanog.dk
- Managing your preferences through your member account on our website:
<https://www.tirnanog.dk/customer-loyalty-program/>

Personalization and loyalty programs

- Purpose: Provide tailored offers (e.g. birthday rewards)
- Legal basis: Legitimate interest (Art. 6(1)(f)) or consent where required

Website analytics and improvement

- Purpose: Analyze usage and improve services
- Legal basis: Consent (cookies) and legitimate interest where applicable

Legal compliance

- Purpose: Accounting, documentation, legal obligations
- Legal basis: Legal obligation (Art. 6(1)(c))

5. Legitimate Interests

Where we process data based on legitimate interests, these include:

- Improving customer experience and services
- Ensuring IT security and preventing fraud
- Understanding how our website is used

We always ensure that such interests are balanced against your rights and freedoms.

6. Booking System (Superb Experience)

We use Superb Experience ApS as our booking system provider.

When you make a reservation, your personal data (such as name, contact details, and booking information) is processed by Superb Experience on our behalf.

Superb Experience acts as a data processor under a data processing agreement and processes personal data only in accordance with our documented instructions.

More information: <https://www.superbexperience.com/privacy-policy>

7. Chat Function (Karla AI)

We use a chatbot provided by KARLA APS.

They may process:

- Information you provide in chat
- Conversation data for service improvement

Karla acts as a data processor on our behalf.

We recommend that you do not share sensitive personal data.

More information: <https://getkarla.ai/data-og-sikkerhed/>

8. Log Files

We use log files as part of standard website operations.

The information collected may include:

- IP address
- Browser type
- Internet Service Provider (ISP)
- Date and time stamp
- Referring and exit pages
- Number of clicks

This data is processed for the following purposes:

- Ensuring website security and preventing misuse
- Troubleshooting and error detection
- Technical maintenance and performance monitoring

The legal basis for this processing is our legitimate interest (GDPR Art. 6(1)(f)) in maintaining a secure and functional website.

IP addresses and similar identifiers may be considered personal data under applicable law. Where possible, data is aggregated or anonymized.

Log data is retained only for as long as necessary for the above purposes and is typically stored for a limited period.

9. Disclosure of Personal Data

We may share your personal data with the following categories of recipients:

- **IT and system providers** (e.g. booking systems, chatbot providers) for the purpose of operating and maintaining our services
- **Marketing and analytics providers** (e.g. analytics tools and advertising platforms) to analyze usage and deliver relevant communications, where applicable based on your consent
- **Public authorities** where required by law or to comply with legal obligations

Where third parties process personal data on our behalf, they act as data processors under data processing agreements and may only process data in accordance with our instructions.

In some cases, third-party providers (such as analytics or advertising platforms) may act as independent data controllers.

We do not sell your personal data.

10. Transfers to Third Countries

Some of our providers (e.g. Google or other technology providers) may process data outside the EU/EEA, including in the United States.

In such cases, we ensure appropriate safeguards, including:

- EU Standard Contractual Clauses (SCCs)
- Additional technical and organizational safeguards where required

11. Data Retention

We retain personal data only as long as necessary:

- Booking data: up to 2 years

- Marketing data: until consent is withdrawn
- Accounting data: up to 5 years
- Job applications: up to 5 months

12. Your Rights

You have the right to:

- Access your data
- Rectify inaccurate data
- Request deletion
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent at any time

Contact: info@tirnanog.dk

You may lodge a complaint with:

Datatilsynet – <https://www.datatilsynet.dk>

13. Profiling and Automated Decisions

We may use limited profiling (e.g. segmentation for marketing and offers).

We do not make automated decisions that produce legal or similarly significant effects.

14. Children's Data

We do not knowingly collect personal data from children under 13 without parental consent.

15. Job Applications

If you apply for a job with us, we will process the personal data you provide (such as your CV and application) for recruitment purposes.

Our legal basis for processing is our legitimate interest in assessing candidates.

If you submit an unsolicited application, we will assess whether it is relevant and delete your personal data if there is no match.

If you apply for a specific job posting and are not selected, we will delete your application once the recruitment process has been completed and the position has been filled.

We do not retain job applications for longer than 5 months, unless you have given your consent for us to keep your data for a longer period.

Access to your personal data is limited to relevant personnel involved in the recruitment process.

16. Security

We implement appropriate technical and organizational measures, including:

- Access control
- Data minimization
- Secure systems and hosting

17. Changes to This Policy

We may update this policy from time to time. The latest version will always be available on our website.

18. Cookie Policy

Cookies are small text files stored on your device when you visit our website. They may contain unique identifiers and can in some cases be personal data.

18.1 Types of Cookies We Use

We use the following categories of cookies:

Necessary cookies

- Ensure basic website functionality
- Cannot be disabled

Preference cookies

- Remember your settings and choices

Statistics cookies

- Help us understand how visitors use the website

Marketing cookies

- Used to deliver relevant ads and measure campaigns

18.2 Legal Basis for Cookies

- Necessary cookies: Legitimate interest
- All other cookies: Consent (GDPR Art. 6(1)(a) + ePrivacy rules)

18.3 Consent and Withdrawal

When you visit our website, you are asked to consent to non-essential cookies.

You can:

- Withdraw consent at any time
- Change your preferences via the cookie banner/settings

18.4 Third-Party Cookies

We may use third-party services such as Google Analytics and advertising platforms.

These providers may collect information such as:

- IP address
- Device and browser information
- Pages visited and interactions

This information may be used to:

- Analyze website traffic and user behavior
- Measure the effectiveness of advertising
- Deliver relevant and personalized advertisements

Some third-party providers, including Google, may act as independent data controllers.

You can read more about how Google processes personal data here:

<https://policies.google.com/technologies/ads>

You can also manage your preferences for personalized advertising through your Google account settings.

18.5 Managing Cookies

You can control or delete cookies via your browser settings.

Please note that disabling cookies may affect website functionality.

19. Contact

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