

## PRIVACY NOTICE

art. 13 and 14 of the (EU) Regulation 2016/679

Dear customer, in compliance with articles 13 and 14 of (EU) Regulation 2016/679<sup>1</sup> – the General Data Protection Regulation (GDPR1), we are hereby informing you about the processing of your personal data by the Federconsorzi Dolomiti Superski and its associated Valley Consortia.

**1- Purposes and legal basis of processing:** Personal data related to customers (name, surname, image, date of birth, gender, tax code, residence, telephone number, bank data and e-mail address, etc.) provided, where necessary, upon purchase of the ski pass or summer lift pass, as well as data collected through the use of the ski pass or summer lift pass itself (e.g. when they are used to access the lifts) shall be processed by Federconsorzi Dolomiti Superski and its associated Valley Consortia that are members thereof, in relation to the use of transport services on the related lift system facilities. The processing of said data is necessary for carrying out the pre-contractual activities required to purchase the different lift passes, for executing the relative contract and provide the relevant services required, for complying with the related regulatory, administrative, accounting and tax obligations, for pursuing legitimate interests related to the protection of company assets (e.g. the verification of the lawful use of the lift pass, including via video-surveillance systems, the so called “Gate Camera”) and possible defensive requirements, as well as to carry out statistical data processing in an anonymous and generalised way in order to develop and improve services. Where ski passes and summer lift passes are issued on chip cards, the RFID technology with which these operate, allow remote recognition, although only within a limited radius at the lift gates, solely for the purpose of verifying the legitimate use of the lift pass. Neither the card’s nor the user’s presence on ski slopes or hiking and biking trails is detected.

**2- Categories of recipients of personal data:** Your data will be processed for the above-mentioned purposes using mainly computerised procedures and may be disclosed to the staff of Federconsorzi Dolomiti Superski or of its associated Valley Consortia that are members thereof, who are authorised to process data and/or to trusted companies carrying out, in their capacity as data processors, various technical or organisational activities on behalf of the above mentioned recipients, such as companies providing administrative, accounting, tax or IT services. Your personal data and the data of the use of the lift passes can be communicated to the affiliated lift operators for the same purposes as in art. 1.

**3- Personal data retention period:** The collected data shall be retained for the entire duration of the contractual relationship. The data related to the purchase and use of the ski pass and summer lift pass shall be anonymised within 24 months from the conclusion of the contract and your personal data shall be deleted. If a new ski pass or summer lift pass is purchased within the mentioned period, the retention period is interrupted and so it shall recommence from the last purchase. The images acquired when accessing the lifts equipped with the “Gate Camera” video-surveillance systems shall be deleted at the end of the card’s validity period. Your personal data collected and processed during the purchase and use of a ski pass during winter season 2019/2020, as well as collected and processed by accepting and during the use of the rebalancing measures offered by Dolomiti Superski for the purchase of a skipass for the winter season 2020/2021, 2021/22, and 2022/23 will be stored and saved until the limitation period expires or until the last possible legal dispute has been settled. This data processing has been made in order to protect the legitimate interests of the Federconsorzi Dolomiti Superski, its associated Valley Consortia, as well as the associated lift societies, in relation to the early closure of winter season 2019/2020 due to the emergency regulation for the containing of the SARS-CoV-2 pandemic on the national territory. The data processing is made for the exclusive purpose of verifying and settling any demands made by customers and with the appropriate technical security measures of data protection.

**4- Mandatory provision of personal data:** The provision of your data is necessary to purchase the ski pass and the summer lift pass as well as to execute the related contract; any refusal to provide such data will therefore mean that it is not possible to conclude the contract or to supply the services.

**5- Exercise of rights:** The GDPR provides the right to access the data related to your person at any time, to obtain a copy thereof, to correct and supplement them where they are inaccurate or incomplete, to delete them or limit their processing where the necessary conditions are met, to object to processing for reasons related to your specific situation, and to request the portability of the data provided where processed in an automated way based on your consent or for the execution of the contract. Likewise, where required, you are entitled to withdraw your consent without prejudice to the lawfulness of the processing based on the consent granted before such withdrawal. The above is without prejudice to your right to petition the Supervisory Authority, including by the filing of a complaint where deemed necessary, for the protection of your personal data and your rights. For any issue related to the processing of your personal data, please contact the Federconsorzi Dolomiti Superski at: [info@dolomitisuperski.com](mailto:info@dolomitisuperski.com).

**6- Joint data controllers:** For the various areas and activities under their responsibility (based on the existing internal agreements between them), your personal data are processed by the following joint data controllers: Federconsorzi Dolomiti Superski, headquartered in Via Arnaria 43, 39040, Castelrotto (BZ), which manages the data center where all ski pass and summer lift pass data are stored, as well as the 12 Valley Consortia associated to Federconsorzi, which process the data of ski passes and summer lift passes sold or used in the areas within their competence as well as data consulted for possible refund requests, or to report unlawful usage, as listed below: 1) Consorzio Esercenti Impianti a Funne Cortina, San Vito di Cadore, Auronzo-Misurina, Via G. Marconi 15, 32043 Cortina d'Ampezzo (BL); 2) Consorzio Esercenti Impianti a Funne Skirama Plan de Corones, Via J.G. Mahl 40, 39031 Brunico (BZ); 3) Consorzio Impianti a Funne Alta Badia, Via Boscdaplan 105, La Villa, 39030 Badia (BZ); 4) Consorzio Esercenti Impianti a Funne Val Gardena/Alpe di Siusi, Via Arnaria 43, 39040 Castelrotto (BZ); 5) Consorzio Impianti a Funne Val di Fassa e Carezza, Via de Pareda 67, 38032 Canazei (TN); 6) Consorzio Impianti a Funne Arabba-Marmolada, Via Boè/Arabba 13, 32020 Livinallongo (BL); 7) Consorzio 3 Zinnen Dolomites, Via Ombrosa 2F, 39038 San Candido/Versciaco (BZ); 8) Consorzio Impianti a Funne Val di Fiemme-Obereggen, Via Roma 2, 38038 Tesero (TN); 9) Consorzio Impianti a Funne San Martino di Castrozza/Passo Rolle, Via Passo Rolle 136, Fraz. San Martino di Castrozza, 38054 Primiero San Martino di Castrozza (TN); 10) Consorzio Rio Pusteria-Bressanone, Via Jochtal 1, Valles, 39037 Rio di Pusteria (BZ); 11) Consorzio Impianti a Funne Alpe Lusia/San Pellegrino, Via Loewy 42, 38035 Moena (TN); 12) Consorzio Impianti a Funne Civetta, Corso Italia, 32022 Alleghe (BL). The identification data and contact details of each member of the Consortia managing the lift system facilities that you have used, can be obtained from each Consortia.

**7- Data protection officer:** The data protection officer of the Federconsorzi Dolomiti Superski (hereinafter DPO) can be contacted at the data controller's address as well as directly via e-mail at the following address: [dpo@dolomitisuperski.com](mailto:dpo@dolomitisuperski.com).

**8- Sending of commercial information related to the services offered:** Your personal data (name, contact details, e-mail address, mobile phone number) may also be processed, subject to your voluntary and separate consent, to send you information related to products or services provided by the Federconsorzi Dolomiti Superski and by its associated Valley Consortia members of Federconsorzi (e.g. newsletters, promotional and advertising material), or notices of local events organized on the territory of Dolomiti Superski by means of e-mail, SMS, MMS, fax, messages to web applications and/or on paper by post, as well as for direct sale and market research purposes, including research related to service quality and satisfaction, via remote communication techniques that use conventional and automated contact methods by means of the above tools. Our mailing service may also be provided with the technical support of third-party companies in their capacity as data processors, to which addresses, or mobile phone numbers may be disclosed solely for said purpose; they may not be used otherwise. Your data shall be used until your objection; they shall subsequently be deleted. The disclosure of your data and your consent for the above purposes are optional and their non-disclosure does not affect existing relations and services. However, in their absence, we shall not be able to send you updates and promotions related to new products and services that might be of interest to you.

**9- Promotional vouchers and collection of personal data from third parties:** Upon handing over a "Dolomiti Superpremière", a "Dolomiti Springdays" or similar promotional voucher at ticket sale offices or when issued

through the online shop of Dolomiti Superski, your personal data (name and surname, date of birth, hotel and period of stay) shall be transferred from the accommodation facility where you are staying to Federconsorzi Dolomiti Superski and to its associated Valley Consortia members of Federconsorzi. In any case, your data are processed solely for the purposes set out at point 1) and shall therefore be deleted at the end of the period referred to at point 3).

**10- Collection of personal data from third parties for ski club members:** If you are member of a ski club that is a partner of a Valley Consortia member of the Federconsorzi Dolomiti Superski, your personal data (name and surname, gender, date of birth, telephone number and e-mail address, ski club of which you are member) may be obtained from the relevant Valley Consortia. Your data are collected only upon purchase of a ski pass for members of partner ski clubs and for the sole purpose of checking the requirements to grant the discount itself. Therefore, your personal data shall be retained for the same period as in art. 3.

**11- Updating of the Privacy Notice:** In the event of any updating of this Privacy Notice, it will be immediately published on the Dolomiti Superski web site.

Updated 14/11/2022 - Subject to possible changes.

<sup>1</sup> (EU) Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of their personal data, as well as on the free movement of such data (General Data Protection Regulation).