



# 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 – the General Data Protection Regulation (GDPR), 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 upon purchase of the ski pass, as well as data collected through the use of the ski pass itself (for example when it is used to access lifts) shall be processed by Federconsorzi Dolomiti Superski and its associated Valley Consortia that are members thereof, as well as by associated operators in relation to the use of transport services on the related lift system facilities. The processing of said data is necessary in order to carry out the pre-contractual activities required to purchase the ski pass, to execute the relative contract and provide the relevant services required, to comply with the related regulatory, administrative, accounting and tax obligations, to pursue legitimate interests related to the protection of company assets 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. The above-mentioned personal data may be used and reprocessed also for specific services activated by customers (including, but not limited to: "Performance Check", on-line purchase and re-charge, etc.), or to pursue legitimate interests related to the verification of the lawful use of the ski pass, including via video-surveillance systems ("Gate Camera") installed at certain lifts in order to compare the picture provided by the user upon purchase with the images detected during access to said lifts, or to examine any refund requests. The ski pass features RFID technology allowing remote recognition, although only within a limited range of lift gates, solely for the purpose of verifying the legitimate use of the ski pass. Neither the card's nor the user's presence on ski slopes is detected.

**2- Categories of recipients of personal data:** Your data will be processed for the above purposes using mainly computerised procedures by the Federconsorzi Dolomiti Superski and its associated Valley Consortia that are members thereof, as well as by associated operators in relation to the use of transport services on the related lift system facilities. Moreover, they may be disclosed to other persons working on behalf of the above mentioned recipients 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.

**3- Personal data retention period:** The data collected shall be retained for the entire duration of the contractual relationship. The data related to the purchase and use of the ski 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 is purchased within the above period, the retention period shall recommence from the additional purchase. With specific reference solely to data acquired from the documents provided by customers wishing to obtain reductions in relation to the purchase of ski-passes (e.g. junior, senior, baby discounts, etc.) or refunds of the price of the purchased ski pass subject to Article 14 of the general terms and conditions, such data shall be retained for the time required to comply with the administrative and tax regulations. The images acquired upon access to the lifts equipped with "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 with the acceptance and during the use of the rebalancing measures offered by Dolomiti Superski for the purchase of a ski pass for the winter season 2020/2021, 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- Provision of data and mandatory nature of consent:** the provision of your data is necessary in order to purchase the ski pass and execute the related contract; any refusal to provide such data will therefore mean that it is not possible to conclude the contract or supply the services.

**5- Exercise of rights:** the GDPR provides the right to access the data related to yourself at any time and 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, 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 arrangements 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 data are stored, as well as the 12 Valley Consortia associated to Federconsorzi, which process the data of ski 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 Fune Cortina, San Vito di Cadore, Auronzo-Misurina, Via G. Marconi 15, 32043 Cortina d'Ampezzo (BL); 2) Consorzio Esercenti Impianti a Fune Skirama Plan de Corones, Via J.G. Mahl 40, 39031 Brunico (BZ); 3) Consorzio Impianti a Fune Alta Badia, Via Boscdaplan 105, La Villa, 39030 Badia (BZ); 4) Consorzio Esercenti Impianti a Fune Val Gardena/Alpe di Siusi, Via Arnaria 43, 39040 Castelrotto (BZ); 5) Consorzio Impianti a Fune Val di Fassa e Carezza, Via de Pareda 67, 38032 Canazei (TN); 6) Consorzio Impianti a Fune 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 Fune Val di Fiemme-Obereggen, Via Roma 2, 38038 Tesero (TN); 9) Consorzio Impianti a Fune 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 Fune Trevalli, Via Loewy 42, 38035 Moena (TN); 12) Consorzio Impianti a Fune 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 actually 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). For more information please visit our website <https://www.dolomitisuperski.com/en/Service/Privacy>

**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 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 (for example 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:** Collection of personal data from third parties: Upon delivery of a "Dolomiti SuperPremière" or "Dolomiti SuperSun" promotional voucher at a sales office, 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 that is a member of 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 a 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 a maximum period of 24 months after said purchase. In the event of an additional purchase of a ski pass for ski club members, or of issuance of a "MyDolomiti Skicard" within the above period, the retention period shall recommence from the additional purchase.

Updated 09/10/2020 - 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).