

## DATA PROTECTION NOTICE

according to art.13 del Regulation EU 2016/679

### a) Identity and contacts of Data Controller

The Data Controller is Funivie Pinzolo S.p.A. with registered office in Via Bolognini n. 84, 38086 Pinzolo (TN).

It will be possible to contact the Data Controller using the following contact details:

- Phone: + 39 0465 501256
- E- mail: [info@funiviepinzolo.it](mailto:info@funiviepinzolo.it)

The activities listed below and marked by an asterisk are processed as joint controllers by the following ski lifts represented by the Skiarea Campiglio Dolomiti di Brenta:

Funivie Folgarida Marilleva S.p.A.(e-mail [info@ski.it](mailto:info@ski.it)) - Funivie Madonna di Campiglio S.p.A. (e-mail [info@funiviecampiglio.it](mailto:info@funiviecampiglio.it))

- Funivie Pinzolo S.p.A. (e-mail [info@funiviepinzolo.it](mailto:info@funiviepinzolo.it)).

### b) Contacts of Data Protection Officer

The Data Protection Officer is DPO Italia S.r.l., with registered office in Antonio Pacinotti n. 13, 39100 Bolzano (BZ).

It will be possible to contact the Data Protection Officer using the following contact details

- Phone: 3934545225
- E-mail certificata (PEC): [dpoitalia@pec.brennercom.net](mailto:dpoitalia@pec.brennercom.net)

### c) Purpose and legal basis of processing, duration of data retention

In relation to the specific activities carried out by Funivie Pinzolo S.p.A., which involve the processing of personal data, are described below:

- purpose of the processing: the reasons that determine the processing of personal data for the purpose of carrying out the activity of the Data Controller;

- legal basis of the processing: the lawfulness condition allowing the processing of personal data;

- storage of personal data: the time period in which the personal data is stored.

The interested party is invited to consider the purposes inherent to the activity carried out within the context of the relationship with Funivie Pinzolo S.p.A.

| Sale of nominative cards of Skiarea Dolomiti di Brenta and business partners (Skirama, Dolomiti Superski, Telepass, Mypass, Snowit)  |  |                                      |
|--|--|--------------------------------------|
| Purposes   | Legal basis  | Storage period                       |
| Issue and activation of cards, possible management of the guarantee deposit, reissue of the card in the event of its loss or breakage, card withdrawal and deactivation activities | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract  | Time required to achieve the purpose |
| Activation of discounts (e.g. for minors or disabled persons), also for holders of trading partner cards   | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract<br><br>The person with a disability has given his or her consent to the processing of his or her personal data | Time required to achieve the purpose |
| Retention of personal data (personal details and image data) for the renewal of season cards   | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract  | 5 years since last card renewal      |
| Payment management   | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract  | Time required to achieve the purpose |

|  |  |   |
|--|--|---|
| Direct mailing of promotional communications in relation to the Data Controller's services similar to those you bought (so-called 'soft spam') | Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party | Until the right of objection is exercised |
| Direct mailing of promotional communications   | The data subject has given consent to the processing of his or her personal data                                   | Until withdrawal of consent               |

| <b>Control to ensure that access to ski facilities is carried out by the person entitled to it (image data collection, through e.g. photocompare, ticket tracking verification)*</b> |   |   |
|--|---|---|
| <b>Purposes</b>  | <b>Legal basis</b>  | <b>Storage period</b>                     |
| Control of the use of the card by the actual card holder through Photocompare system   | Processing is necessary for the purposes of the legitimate interests pursued                      | 15 days after the expiry date of the card |
| Identification of persons searching for lost persons on ski slopes   | Processing is necessary for compliance with a legal obligation to which the controller is subject | Time required to achieve the purpose      |
| Verification of the presence of the card holder on the ski slopes through tracking, in cases of claims for compensation following an accident  | Processing is necessary for the purposes of the legitimate interests pursued                      | 5 years                                   |
| Retention of personal data (personal details and image data) collected during purchase and issue of the ski pass   | Processing is necessary for the purposes of the legitimate interests pursued                      | 5 years since last card renewal           |

| <b>Access management in the ski area*</b>  |   |  |
|--|---|--|
| <b>Purposes</b>  | <b>Legal basis</b>  | <b>Storage period</b>  |
| Acquisition, recording, access to video surveillance images in order to meet organisational and production requirements, protection of company assets, safety at work, access control, as well as to prevent theft or damage and accidents at work, to protect the safety of persons and assets, and to provide legal protection for the company | Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party  | Time required for the verification of any damage, theft, intrusion as well as investigations relating to the safety and security of the users of the ski facilities and in any case no longer than a maximum of seven days, except for specific requests by the investigating authority and for activities to reconstruct the dynamics relating to accidents |
| Communication of data to the affiliated insurance company for the handling of claims covered by the terms and conditions of the contract   | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract | Time required to achieve the purpose   |
| Managing access with convention cards (e.g. Dolomitisuperski Skirama, Mypass, Snowit) for each purpose described in this policy  | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract | Time required to achieve the purpose   |

| Managing commerce platform data from website ski.it   |   |                                      |
|---|---|--------------------------------------|
| Purposes  | Legal basis   | Storage period                       |
| Managing activities related to the sale of services through the e-commerce platform                                       | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract | Time required to achieve the purpose |
| Activation of discounts (e.g. for minors)   | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract | Time required to achieve the purpose |
| Direct mailing of promotional communications  | The data subject has given consent to the processing of his or her personal data for one or more specific purposes  | Until withdrawal of consent          |
| Accounting and tax management   | Processing is necessary for compliance with a legal obligation to which the controller is subject   | Time required to achieve the purpose |
| Data storage to allow users direct access to the sales services offered by the platform and to update their personal data | The data subject has given consent to the processing of his or her personal data for one or more specific purposes by the registration on the platform                                      | Until withdrawal of consent          |

| Processing resulting from website ski.it navigation                   |  |  |
|---|--|--|
| Purposes  | Legal basis  | Storage period   |
| Responding to contact requests through the 'request information' form | Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract                    | Time required to achieve the purpose                                 |
| Sending Newsletter  | The data subject has expressed consent to the processing of his or her personal data<br><br>The data subject has given consent to the processing of his or her personal data for one or more specific purposes | Until withdrawal of consent  |
| Technical and analytical cookie management                            | Processing is necessary for the purposes of the legitimate interests pursued by the controller   | Time required to achieve the purpose (please refer to Cookie policy) |

**d) Recipients or categories of recipients**

For the purposes described above, the Data Controller will process the personal data provided by authorised personnel. Your personal data may be communicated to the following categories of recipients: credit institutions, insurance companies, freelancers, consultants, partners, suppliers of information systems, as Data Processor, as well as other autonomous or joint Data Controllers (of which you are invited to view the information data protection). Your personal data may be communicated to the Authorities that request it for judicial investigation. The data will not be publicly disclosed.

**e) Transfer of personal data to a third country or international organisation**

Some processing of your personal data will be transferred to third countries outside the EU, in particular to the USA due to platforms located there. We inform you that such processing does not affect the protection of individuals guaranteed by European legislation because the providers of these platforms have adhered to the EU-U.S. Data Privacy Framework ratified by an adequacy decision of the European Commission.

**f) Rights of the data subject**

At any time you have the right to request the Controller:

- access to your personal data, as well as a copy of the personal data provided;
- rectification of personal data;
- erasure of personal data;
- the restriction of the processing of your personal data.

You may exercise your right to object to the processing of your personal data at any time, by sending your request to the Data Controller, if the processing is based on legitimate interest or is carried out for commercial promotion.

You may also withdraw any consent you have provided at any time. In order to withdraw one or more of the consents given, you may contact one of the contact details listed under a) or b) of this information.

The exercise of these rights is subject to certain exceptions and conditions, including those aimed at safeguarding the public interest (e.g. the prevention or identification of crimes) and our legitimate interests (e.g. the management of any litigation aimed at defending a right in administrative and judicial proceedings).

Should you exercise any of the aforementioned rights, it is our duty to verify that you are entitled to do so and we will reply to you generally within one month.

**g) The right to lodge a complaint with a Supervisory Authority**

For any complaints or notifications on how your data is processed, we will make every effort to respond to your concerns in writing. However, if you consider that the processing of your personal data violates the requirements of EU Regulation 2016/679, you have the right to lodge a complaint with the Supervisory Authority by following the procedures and instructions published on the Authority's official website at [www.garanteprivacy.it](http://www.garanteprivacy.it).

**h) Statutory or optional nature of providing data and consequences of failure to provide data**

The provision of your data to the Data Controller is statutory only for the data necessary to achieve the purposes set out in point c), and failure to provide such data will result in the impossibility of correctly executing your request.

**i) Automated decision-making**

The Data Controller does not use any automated decision-making processes concerning.