

POLICY PURSUANT TO ART. 13 AND ART. 14 OF EU REGULATION 2016/679 (GDPR)

Pursuant to article 13 and article 14, EU Reg. 2016/679 (hereinafter “GDPR”) and in relation to the personal data of which it comes into possession during the fulfilment of this contract, Sestrieres S.p.A. hereby informs the Contracting Party (hereinafter also “data subject”) of the following:

- a) The data controller is Sestrieres S.p.A. with registered office in Piazza Agnelli 4 - 10058 Sestriere (TO), tax code and VAT number 00941880015. The data protection officer (DPO) appointed by Sestrieres S.p.A. is Spaziottantotto S.r.l., which can be contacted at dpo@spazio88.com. Requests must be sent to privacy@vialattea.it or to the following numbers Tel. +39 0122.799.411, Fax. +39 0122.799.460.
- b) The personal data processed are personal details, special data (e.g. relating to health for the issue of special ski passes and also for reimbursement by insurance companies in the event of an accident), contact details, bank details (if applicable), image-related data (video surveillance, ski pass photos, if applicable), data relating to access and movements within the ski resort (geolocation using RFID technology).
- c) The processing of personal data is aimed at:
 - The issue and fulfilment of the Skipass Sales Contract and the use of the facilities. The legal basis of the processing is the fulfilment of obligations arising from the contract in force.
 - The fulfilment by the Controller of legal, administrative, accounting and fiscal obligations. The legal basis of the processing is the fulfilment of the legal obligations to which the Data Controller is subject.
 - Ensuring emergency relief, including subsequent insurance reimbursement activities, and any other activity related to accidents. The legal basis of the processing is the need to protect a vital interest of the person being rescued, to fulfil a public interest relating to the protection of life and physical safety.
 - Sending commercial information, various documents from Sestrieres S.p.A. or its commercial partners, performing marketing activities or market research. The legal basis of the processing is consent; the provision of contact details is optional.
 - Sending commercial information deemed to be of particular interest to the Contracting Party, based on purchasing habits and other profiling information, collected through the website, the VialatteaSki app and the webshop. The legal basis of the processing is consent; the provision of contact details is optional.

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- Collecting data on the use of the facilities (passages through turnstiles and security video cameras) both to ensure that only those entitled to access the facilities actually do so (checking the picture on the ski pass, if necessary) and also for reasons related to the security and smooth operation of the facilities. To this end, RFID and VIDEO SURVEILLANCE detection systems are installed on the facilities. The legal basis of the processing is the legitimate interest of the data controller.

All data may also be processed if they are required to ascertain, exercise or defend a right of the Controller in or out of court.

- d) The provision of the data is an essential condition for entry into and fulfilment of this contract and is therefore deemed necessary. Consequently, if the data requested are not provided, the contract cannot be finalised.
- e) Processing may be carried out with or without the aid of electronic or automated tools in compliance with the provisions of the Code and the GDPR, guaranteeing the security and confidentiality of personal data. The detection of passages through the turnstiles, in particular, will be carried out automatically by the system contained within the ticket (RFID label) and on the turnstile itself (RFID antenna). This detection will make it possible to indicate the geographical location of the person by means of an electronic communication network; this information may be combined with personal identification exclusively for named passes and may be made available to the ticket holder by means of an electronic communication network. Access to the system may also be reserved to personnel authorised by Sestrieres S.p.A. for the sole purpose of checking the quality and technical operation of the service.
- f) The processing is carried out by persons authorised to process data under the direct authority of the Data Controller or by designated data processors, i.e.: professionals, consultants or independent companies operating on behalf of the Data Controller (e.g. the web agency that manages and maintains the website, those responsible for managing IT systems, the rescue service, etc.) for the purpose of fulfilling the corresponding contract. The updated list of data processors is available to the data subject upon request, to be addressed to the Data Controller at the e-mail address indicated in this policy. Furthermore, notwithstanding the communications to third parties that are mandatory by law for administrative, accounting and fiscal purposes, the personal data acquired, with the exclusion of those that are not necessary, may be disclosed to: (I) Other companies that manage part of the district in non-Italian territory, (II) Those involved in the rescue operation, (III) Banks (for the payment methods adopted), (IV) Insurance companies (to insure the user and for reasons related to possible claims), (V) Freelancers (e.g. for lawsuits, disputes, claims, etc.) bound by professional secrecy, (VI) The competent authorities in the exercise of their duties or in the public interest.

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- g) No data will be distributed.

The Personal Data is stored by the Controller within the European Union ("EU"). The Data Controller may need to transfer data to suppliers based in countries outside the European Union. In this case, the Controller will ensure that the information is properly and adequately protected, in compliance with the principles indicated in articles 45 and 46 of the GDPR, entering into legal agreements governing the transfer of information and providing adequate guarantees, where appropriate.

- h) Personal data will be kept for the period strictly necessary to provide the services and to pursue the specific aims of the processing, until the expiry of the legal limitation period, also to protect the interests of the Data Controller in and out of court. Moreover, the Data Controller may be obliged to retain personal data for a longer period in compliance with a legal obligation or by order of an Authority. At the end of the retention period, all personal data will be deleted. Therefore, beyond such term, the rights of access, deletion, rectification and portability of the data can no longer be exercised.

- i) The Data Subject may, at any time, exercise their rights (access, rectification, erasure, restriction, portability, objection, absence of automated decision-making processes) when envisaged in relation to the data controller, pursuant to articles 15 to 22 of the GDPR (available at the following link:

<https://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=IT#d1e2168-1-1>);



lodge a complaint with the Privacy Authority (www.garanteprivacy.it); where the processing is based on consent, withdraw said consent, bearing in mind that such withdrawal of consent shall not affect the lawfulness of the processing based on the consent in place before the withdrawal. The aforementioned rights may be exercised by sending a request to the Data Controller through the channels indicated in this notice. Once the data subject has requested the deletion of their data, they acknowledge that their data will not be eliminated, but made anonymous and used only for statistical purposes. Requests regarding the exercise of the user's rights will be processed without undue delay and always within one month of the request. Requests concerning the objection to the receipt of informative and commercial correspondence will be processed in the shortest possible time, without prejudice to the applicability of technical timeframes that may entail the receipt of any correspondence also following the exercise of your rights. Only in cases of particular complexity and number of requests may this term be extended by a further two months.

- j) Please note that the pass is personal and non-transferable and that it must be kept safe to prevent others from using it. It is assumed that the person using the identification number is the holder or another person authorised by them. Sestrieres S.p.A. declines all liability for any improper or fraudulent use.
- k) For ski passes issued to minors, it is the responsibility of the person exercising parental responsibility to grant authorisation for the processing of the data, particularly in consideration of the aforementioned conditions of sale.

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