



INFORMATION ON PROCESSING OF PERSONAL DATA FOR LODGING AND SHARE OWNERS (VERSION 2022-06)

Personal Data Controller

SkiStar AB (publ.)

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SkiStar processes all personal data in accordance with EU data protection legislation, the General Data Protection Regulation (GDPR). SkiStar AB is responsible for the handling of the personal data we collect from you. SkiStar Norge AS, reg. no NO 977 107 520 MVA, is part of the SkiStar Group and processes your data when you are in contact with one of our Norwegian destinations. SkiStar AB and SkiStar Norge AS thus have joint personal data responsibility for certain data we collect about you when you are in contact with a Norwegian destination, but SkiStar AB has overall responsibility for the entire group's operations and exercises a dominant influence over the group companies. SkiStar AB is your main contact for questions and to exercise your rights. However, what is stated in this information document is applied by all companies within the SkiStar Group.

Especially for those who are in contact with us via SkiStar Vacation Club

Fjällinvest AB, reg. no 556426-8380, is part of the SkiStar Group and processes your data when you are in contact with SkiStar Vacation Club. As with SkiStar Norge AS, SkiStar AB and Fjällinvest AB have joint personal data responsibility for certain information we collect about you, but SkiStar AB has overall responsibility for the entire group's operations and exercises a dominant influence over the group companies.

What personal data we collect about accommodation owners

SkiStar may collect and process personal data about you in our business relationship, directly with you or when entering into and maintaining a contract.

The categories of personal data SkiStar may process are:

- **Financial information** (e.g. billing information, income, economic situation, tax situation, shareholdings)
- **Company information** (e.g. company name, personal/contact information)
- **ID information** (e.g. national ID number, national ID, passport)
- **Comments/references/evaluation** (e.g. related to inspection/inspections/comments e.g. related to objects, owners in the form of person/company))
- **Card details** (e.g. account number for payment)
- **Purchase information** (e.g. purchase history, product/service data)
- **Lifestyle-related data** (e.g. consumption of goods/services, information about travel, friends)
- **Personal/Contact information** (e.g. name, customer/member number, mailing address, telephone number, email address)
- **Personal/contact information for co-owners**
- **Personality characteristics** (e.g. age, gender, marital status, date of birth, place of birth)
- **Registration number**(vehicles)
- **System rights**(e.g. access rights, user information)

- **Special information about the lodging property** (owner, address, timeshare, tenant-owner, etc.)
- **Information provided by the registrant**(e.g. answers to customer surveys, information in correspondence via e-mail, chat, phone)

SkiStar never collects more information about you than necessary.

How we use your personal data (for accommodation owners)

The personal data we collect about you is processed for the following purposes and on a legal basis:

Purpose of processing	Legal basis
<ul style="list-style-type: none"> • Accounting purposes (setting up financial reporting and reporting incl. audit) 	Fulfilment of a legal obligation
<ul style="list-style-type: none"> • Administration of contractual relationship incl. accounts/payments to accommodation owners/share owners • Administration of rental services • Administration and filing of agreements • Manage lodging owner benefits • System administration and permissions (passwords, login, key access, etc.) 	Execution of contracts
<ul style="list-style-type: none"> • Manage statistics and other information • To prevent and deter criminal acts and other acts of a similar nature (e.g. breaches of public conditions) • Marketing of SkiStar's products and services • Marketing and information about SkiStar and SkiStar's products/services • Productivity and quality monitoring and resource planning for e.g. cleaning and property services 	Balancing of interests

What personal data we collect about you as a share holder

The categories of personal data SkiStar may process are:

- **Financial information** (e.g. billing information, income, economic situation, tax situation, shareholdings)
- **Company information** (e.g. company name, personal/contact information)
- **ID information** (e.g. national ID number, national ID, passport)
- **Comments/references/evaluation** (e.g. related to inspection/inspections/comments e.g. related to objects, owners in the form of person/company))
- **Card details** (e.g. account number for payment)
- **Purchase information** (e.g. purchase history, product/service data)
- **Lifestyle-related data** (e.g. consumption of goods/services, information about travel, friends)
- **Personal/Contact information** (e.g. name, customer/member number, mailing address, telephone number, email address)
- **Personal/contact information for co-owners**

- **Personality characteristics** (e.g. age, gender, marital status, date of birth, place of birth)
- **Registration number**(vehicles)
- **System rights**(e.g. access rights, user information)
- **Special information about the lodging property** (owner, address, timeshare, tenant-owner, etc.)
- **Information provided by the registrant**(e.g. answers to customer surveys, information in correspondence via e-mail, chat, phone)

How we use your personal data (for shareholders of SkiStar Vacation Club)

The personal data we collect about you is processed for the following purposes and on a legal basis:

Purpose of processing	Legal basis
<ul style="list-style-type: none"> • Accounting purposes (setting up financial reporting and reporting incl. audit) • Reporting of sales, compensation, deductions and taxes and fees to the authorities 	Fulfilment of a legal obligation
<ul style="list-style-type: none"> • Administration of contractual relationship incl. accounts/payments to shareholders • Administration in connection with housing associations • Administration and filing of agreements • Manage owner-related benefits • System administration and permissions (passwords, login, key access, etc.) 	Execution of contracts
<ul style="list-style-type: none"> • Manage statistics and other information • Marketing of SkiStar's products and services • Marketing and information about SkiStar and SkiStar's products/services • Productivity and quality monitoring and resource planning including logging of vehicles, premises and equipment 	Balancing of interests

If you do not disclose your personal data or object to processing, SkiStar cannot fulfil its contractual and legal obligations to you or manage the work effectively.

With regard to the above purposes that SkiStar processes after balancing of interests, SkiStar has the following legitimate interests in processing the data:

- Manage and plan the work
- Marketing SkiStar's services and products
- Protect company employees and assets
- Contact and inform employees and business partners
- Achieve transparency towards shareholders and the public

Who may we share your personal data with?

Your personal data will be transferred or shared with SkiStar's central accounting functions and to a certain extent the IT function. Your personal data may also be disclosed to authorities or to system and service providers, partners, sub-suppliers such as cleaning and property management companies and

auditors for specified purposes. In the event that SkiStar sells or buys operations or assets, SkiStar may also disclose your personal data to a potential seller or buyer of such activities or assets.

How long we store your personal data

Personal data that are only necessary to perform our contract will be deleted as a basis when our agreement expires. However, personal data necessary in order to comply with obligations under the accounting law, tax obligations, etc. must be stored as long as this is necessary in order to comply with obligations under such provisions. In the event of complaints and disputes, we store the information for up to ten years in order to defend our interests in case of legal claims. Some data, such as names, contact details and the like, may also be saved for up to two years after the contractual relationship has ended, in order for SkiStar to be able to contact the lodging/share owner for potential future business. Data stored on the basis of our legitimate interest is stored on the basis of internally developed storage decisions and varies depending on processing.

Your rights

You have the right to:

- Get access to your personal data. You can request a copy of the information you would like and verify the information we hold about you. A copy is free of charge to request.
- Obtain rectification of inaccurate or incomplete personal data.
- Get your data deleted in certain cases, for example if your personal data is no longer necessary for the purposes for which it was collected.
- Get a restriction on the processing of your personal data in certain cases – for example if you have objected to the processing of your personal data based on balancing of interests – while checking whether our reasons weigh up than your interests, rights and freedoms.
- Receive and transfer personal data to another data controller in certain cases (data portability).

You can contact our Security Officer (contact details as above) with any questions about the handling of personal data and your rights. When requesting access to your data, you can send an email to personuppgifter@skistar.com as we have special case handling for such requests.

Objection to treatment

You have the right to object to processing of your personal data based on a balancing of interests. Continuous processing of your personal data requires that we can show overriding legitimate reasons that weigh up than your interests, rights and freedoms, or if this is done in order to establish, exercise or defend legal claims.

Complaints

Turn to your contact person at SkiStar or to our Security Officer in case of complaints regarding SkiStar's processing of personal data. You also have the right to file a complaint with the Privacy Authority or any other competent supervisory authority within the EU.