

## INFORMATION ON PROCESSING OF PERSONAL DATA FOR SKISTAR BUSINESS CUSTOMERS (VERSION 2023-07)

### Personal data controller

SkiStar AB (publ), org. no. 556093-6949

780 91 Sälen, Sweden

Phone: 0280-880 50

E-mail: [dpo@skistar.com](mailto:dpo@skistar.com)

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, org.nr 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 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.

### I.1 Personal data that may be processed when you are a business customer

When SkiStar processes personal data about you as a lodging or timeshare owner, it is primarily to manage the contractual relationship between us (e.g. to communicate with you about your lodging, pay compensation, manage owner bookings, etc.). 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:

- **Bank details** (e.g. bank, credit/debit card information, account number).
- **Booking details** (as an owner's booking) (e.g. guest information, fellow travellers, booking number, period, destination, products/activities you booked).
- **Financial information** (e.g. payment method, billing information, income, financial condition, shareholding).
- **Company information** (e.g. company name, personal/contact information)
- **Health information** (e.g. allergies, disability, medical condition, injury information).
- **Identity information** (e.g. name, customer number, personal number (used in specific cases and printed separately), date of birth, gender, nationality).
- **Comments/references/evaluation** (e.g. related to inspection/checks/comments e.g. related to objects, owners in the form of person/company))
- **Contact details** (e.g. e-mail address, postal/delivery address, telephone number).
- **Purchase details** (e.g. product/service details in the context of a rental)
- **Registration number** (vehicle)
- **Information about travelling companions** (e.g. health information, identity information, contact information, skier's details).
- **Information provided by the business customer** (e.g. responses to customer surveys, information in e-mail correspondence, chat, telephone)
- **Skier's details** (e.g. height, weight, shoe size, head size, skills).

SkiStar never collects more information about you than necessary. We may collect data about private address, etc. where this is necessary to be able to fulfil our contract, for example if you operate an individual company.

### I.2 The purpose of personal data and the legal basis uses

The table below explains more about 1) the purpose for which we use your personal data (the purpose), 2) the categories of personal data we may use for each purpose, and whether we have

obtained the data from you or another source, and 3) the legal basis on which we use your data. To read about when we delete your personal data, see section 1.4.

1) Purposes of processing personal data	2) Types of personal data and where they come from (source)	3) Legal basis for processing under the GDPR
Administration of the SkiStar customer register (register maintenance)	<u>Data coming from you:</u> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information</li> <li>• Contact details</li> <li>• Purchase details</li> </ul> <u>Data coming from someone other than you:</u> SkiStar <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)
Administration of the group/travel company's booking, arrangements/products (incl. cancellation)	<u>Data coming from you:</u> <ul style="list-style-type: none"> <li>• Bank details</li> <li>• Financial information</li> <li>• Company information</li> <li>• Identity information</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Purchase details</li> <li>• Registration number</li> <li>• Information about travelling companions</li> <li>• Information provided by the business customer</li> <li>• Skier's details</li> </ul> <u>Data coming from someone other than you:</u> SkiStar <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	SkiStar must be able to perform the agreement between SkiStar and the business customer
Administration of discounts and benefits (including discounts/benefits with our partners)	<u>Data coming from you:</u> <ul style="list-style-type: none"> <li>• Financial information</li> <li>• Company information</li> <li>• Identity information</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Purchase details</li> <li>• Registration number</li> <li>• Information about travelling companions</li> </ul> <u>Data coming from someone other than you:</u> SkiStar <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	SkiStar must be able to perform the agreement between SkiStar and the business customer
Administration of statistics and other information	<u>Data coming from you:</u> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Information about travelling companions</li> </ul> <u>Data coming from someone other than you:</u> SkiStar <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)

<p>Accounting purposes (setting up financial reporting and reporting incl. audit)</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Financial information</li> <li>• Purchase details</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>Legal obligations (there are laws or regulations that ensure that the personal data controllers must process certain personal data)</p>
<p>To prevent and deter criminal acts and other acts of a similar nature (e.g. breaches of public conditions)</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information (including ID number)</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Information about travelling companions</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)</p>
<p>Conduct customer surveys with SkiStar and our partners</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information</li> <li>• Contact details</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)</p>
<p>Conduct calls after you contact us and say you are interested in our service/product</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information</li> <li>• Contact details</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>Consent (data subject has agreed to the processing)</p>
<p>Marketing of SkiStar's products and services</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information</li> <li>• Contact details</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)</p>
<p>Marketing of SkiStar and SkiStar's products/services</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information</li> <li>• Contact details</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)</p>
<p>Reporting of sales, compensation, deductions and taxes and fees to the authorities</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Financial information</li> <li>• Purchase details</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>Legal obligations (there are laws or regulations that ensure that the personal data controllers must process certain personal data)</p>

<p>Provide support, troubleshooting, improvement, ordering and other necessary handling of SkiStar's IT system and application-related matters</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Bank details</li> <li>• Financial information</li> <li>• Company information</li> <li>• Identity information</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Purchase details</li> <li>• Registration number</li> <li>• Information about travelling companions</li> <li>• Information provided by the business customer</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)</p>
<p>Registration of foreign guests and visa management</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Identity information</li> <li>• Contact details</li> <li>• Purchase details</li> <li>• Information about travelling companions</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>Legal obligations (there are laws or regulations that ensure that the personal data controllers must process certain personal data)</p>

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

If you do not wish to receive marketing material from us, you may decline it at any time by contacting SkiStar Business at [business@skistar.com](mailto:business@skistar.com).

### 1.3 Who may we share your personal data with?

Your personal data will primarily be transferred or shared with the relevant business areas of SkiStar and our sub-suppliers and/or partners. Your personal data may also be disclosed to authorities or to system and service providers, insurance 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. We only share personal data with them to the extent necessary for them to provide their services to you and your group; they only have access to the personal data that is necessary.

### 1.4 How long we store your personal data for

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. Certain 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 Business Customer 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.

### **1.5 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 Data Protection Officer (contact details as above) with any questions about the handling of personal data and your rights. To request access to your data, you can send an e-mail to [personuppgifter@skistar.com](mailto:personuppgifter@skistar.com) as we have a dedicated system for handling such requests.

### **1.6 Objection to processing**

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.

### **1.7 Complaints**

Contact your contact person at SkiStar or our Data Protection 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.