

PRIVACY POLICY 2023-07

WE PROTECT YOUR PERSONAL DATA

Your trust is important to us at SkiStar ("SkiStar", "we", "us"). Our aim with this policy is to describe to you in a clear and transparent way how we collect, use, transfer and store your information so that you feel confident that your personal data is safe and not misused.

We take ongoing steps to comply with the principles of "data protection by design and data protection by default". We continuously evaluate the risks associated with the processing of personal data that takes place and put the necessary security measures in place to reduce the risks. We train all our staff continuously on data protection matters.

Personal data means all kinds of information that can be directly or indirectly attributed to a living, natural person. In this text, we describe how and why SkiStar processes personal data when you shop at SkiStar, skistar.com, skistarshop.com, eqpestore.com or integrate with us through our customer club SkiStar Member. The terms and conditions of the member's club, booking terms and conditions of purchase can be found [here](#). SkiStar processes all personal data in accordance with EU data protection legislation, the General Data Protection Regulation (GDPR). The data controller for the processing of your personal data is SkiStar AB, unless specified otherwise in this information. However, this privacy policy is applied by all companies within the SkiStar Group, but SkiStar AB has overall responsibility for the SkiStar Group's operations and that's why you should contact SkiStar AB with questions or to exercise your rights. See more about how to exercise your rights in the section 8.

I FOR YOU AS A PRIVATE CUSTOMER OR TRAVELLING HOS SKISTAR

When you interact with us as a private customer or fellow traveller, we process your personal data. What personal data we process depends on how you interact with us, such as when you book a trip or activity for you or your travelling companion at skistar.com or buy a product at skistarshop.com or eqpestore.com. When you book a trip/activity or buy a product, we primarily handle your data in order to be able to fulfil our contract with you and provide you with good service, but your personal data may also be processed at an overall level for general market/customer analyses and statistics. We do this in order to be able to improve our products and services continuously and provide you with a memorable mountain experience.

I.1 Personal data that may be processed as a private customer or travelling companion with SkiStar

Below is a description of the personal data we may process when you integrate with us as a private customer or travelling companion. We share personal data in specific personal data categories to make it easier for you to get an overview of what data we may process when. In Section 1.2 we describe what we use these personal data categories for.

Activity days (number of personal book activities that entitles a member to a special level in the offer stages).

Bank information (e.g. bank, credit/payment card information, account number).

Image/video (e.g. images on SkiPass, camera monitoring (CCTV), images/videos on social

media or website, user-generated images within SkiStar Game).

Booking information (e.g. visitor information, travelling companions, booking number, period, destination, which products/activities you have ordered).

Financial information (e.g. payment methods, billing information, income, financial situation, shareholding).

Electronic identification information (e.g. IP addresses, device identifiers and cookies, (for information on how we specifically process cookies, see our [cookie policy](#)).

Health information (e.g. allergies, disability, medical condition, injury information).

Identity information (e.g. name, customer number, national ID number (to be used in specific cases and printed separately), date of birth, gender, nationality)

Contact information (e.g. e-mail, mailing address/delivery address, telephone number).

Purchase details (e.g. purchase history, product/service details, bonus points).

Lifestyle-related data (e.g. interests, consumption of goods/services, travel information, friends).

Location data (GPS).

Registration number (vehicles).

Information about the minor (e.g. health information, identity information, contact information, purchase information, skier’s details, skiing statistics). *Contact information and purchase information will only be available if youth (16-18 years) make purchases from us themselves. Skiing statistics are only available if a minor has registered in our member club and is using SkiStar Game.*

Information you provide (e.g. answers to customer surveys, information in correspondence with customer services (e.g. chat, email, phone, during visits).

Information about travelling companions (e.g. health information, identity information, contact information, skier’s details).

Skier’s details (e.g. height, weight, shoe size, head size, skills).

Skiing statistics (information about where and when an axe card was used).

1.2 What personal data is used on what legal basis

In the table below you can read about 1) for what purposes we use your personal data (purpose), 2) which categories of personal data we may use for each purpose and whether we have received the data from you or from another source, 3) on which legal basis we use your data and 4) when we stop processing your data for the specified purposes. If you want to read about when we delete your personal data, see section 5.

Purpose of processing of personal data	Types of personal data and where it comes from (source)	Legal basis for processing under the GDPR	When the purpose of processing ceases
Administration of booking (incl. cancellation)	<u>Information from you:</u> <ul style="list-style-type: none"> Bank information Image/video Health information 	Agreement (the registered person has or shall enter into a contract with the data controller)	When the agreement between you and SkiStar expires

	<ul style="list-style-type: none"> • Identity information (incl. national ID number) • Contact details • Purchase details • Registration number • Information about the minor • Information you provide • Information about travelling companions • Skier's details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) 		
Administration of booking for sharing activity days	<p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Identity information (your travelling companion) • Contact information (your travelling companion) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	First come: 15 May after your day of activity, or if you notify us that you are not interested in this treatment
Administration of lodging with guests	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Health information • Identity details • Contact details • Purchase details • Registration number • Information about the minor • Information about travelling companions • Information you provide <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Location data (your unit) 	Agreement (the registered person has or shall enter into a contract with the data controller)	When the agreement between you and SkiStar expires
Administration of discount/benefits (incl. administering the discount together with our partners)	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity information (incl. national ID number) • Contact details • Purchase details • Registration number • Information about the minor <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. 	Agreement (the registered person has or shall enter into a contract with the data controller)	When the agreement between you and SkiStar expires

	<p>payment service provider or provider of our share portfolio)</p> <ul style="list-style-type: none"> • Skiing/boarding statistics (axis card) 		
Administration of claims	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Health information • Identity information (incl. national ID number) • Contact details • Information about the minor • Information you provide • Information about travelling companions <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Skiing/boarding statistics (axis card) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	Up to ten (10) years due to limitation rules
Administration of SkiStar's website and app	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Image/video • Identity details • Contact details • Lifestyle-related data • Information about the minor • Information you provide <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Electronic identification information (your device) • Location data (your unit) • Skiing/boarding statistics (axis card) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	Occurs for as long as SkiStar is otherwise entitled to store your data, for example because you are a customer or in order to comply with the law or fulfil an agreement with you
Administration of SkiStar's customer registry	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Bank information • Image/video • Health information • Identity information (incl. national ID number) • Contact details • Purchase details • Lifestyle-related information • Registration number • Information about the minor • Information about travelling companions • Information you provide • Skier's details <p><u>Information from others other than</u></p>	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	Occurs for as long as SkiStar is otherwise entitled to store your data, for example because you are a customer or in order to comply with the law or fulfil an agreement with you

	<p><u>yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) • Skiing/boarding statistics (axis card) 		
Administration of SkiStar's social media	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Image/video • Identity details • Contact details • Information you provide <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Electronic identification information (your device) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	Occurs for as long as SkiStar is otherwise entitled to store your data, for example because you are a customer or in order to comply with the law or fulfil an agreement with you
Manage accounting	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Bank information • Identity details • Contact details • Purchase details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) 	Legal obligations (there are laws or regulations that ensure that the personal data controllers must process certain personal data in their business)	During the time that the accounts are compiled and 7 years after the end of the year in which the data was registered
Manage insurance and manage insurance matters	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity information (incl. national ID number) • Contact details 	Agreement (the registered person has or shall enter into a contract with the data controller)	When the agreement between you and SkiStar expires
Manage reviews left on skistarshop.com and eqpestore.com	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Information you provide <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	Occurs for as long as SkiStar is otherwise entitled to store your data, for example because you are a customer or in order to comply with the law or fulfil an agreement with you
Analysis and statistics	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Lifestyle-related information • Information about the minor • Information about travelling 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	Occurs for as long as SkiStar is otherwise entitled to store your data, for example because you are a customer or in order to comply with the law or fulfil an agreement

	<p>companions</p> <ul style="list-style-type: none"> • Information you provide • Skier's details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) • Electronic identification information (your device) • Location data (your unit) • Skiing/boarding statistics (axis card) 		with you
Improve/develop SkiStar products and services (via a focus group or similar)	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Information about travelling companions <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	Occurs for as long as SkiStar is otherwise entitled to store your data, for example because you are a customer or in order to comply with the law or fulfil an agreement with you
Conduct customer surveys for SkiStar (if you have entered into a contract with us)	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Information you provide <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Skiing/boarding statistics (axis card) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	Up to one year from the date of termination of the agreement or when you notify us that you are not interested in this processing
Conduct customer surveys from our partners (if you have entered into a contract with us)	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	Up to one year from the date of termination of the agreement or when you notify us that you are not interested in this processing
Handle violations of SkiStar's terms and conditions	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Image/video (which you have uploaded yourself) • Electronic data • Health information • Identity information (incl. national ID number) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	Up to ten (10) years due to limitation rules

	<ul style="list-style-type: none"> • Contact details • Purchase details • Registration number • Information about the minor • Information about travelling companions • Information you provide <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Image/video (surveillance camera) • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) • Location data (your unit) • Skiing/boarding statistics (axis card) 		
<p>Manage purchases made on skistarshop.com and eqpestore.com (including delivery and returns/complaints)</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Bank information • Financial information • Identity details (incl. national ID number) • Contact details • Purchase details • Information you provide • Skier’s details (if you buy assembled ski equipment) <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) 	<p>Agreement (the registered person has or shall enter into a contract with the data controller)</p>	<p>When the agreement between you and SkiStar expires</p>
<p>Manage SkiStar events and the like (in which you have chosen to participate)</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Image/video • Identity details (incl. national ID number) • Contact details • Purchase details • Information about the minor • Information you provide • Skier’s details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) 	<p>If you participate in events for which you have registered: Agreement (the registered person has or shall enter into a contract with the data controller)</p> <p>If you participate in a free event: Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)</p>	<p>When the agreement between you and SkiStar expires</p> <p>Once the event has been completed and SkiStar's purpose for processing personal data has ceased.</p>

<p>Handling and delivery of other non-commercial messages (general information, etc.)</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Information about the minor • Information about travelling companions • Information you provide <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) 	<p>Agreement (the registered person has or shall enter into a contract with the data controller)</p>	<p>When the agreement between you and SkiStar expires</p>
<p>Customer segmentation</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Lifestyle-related information • Information about the minor • Information about travelling companions • Skier's details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) • Electronic identification information (your device) • Skiing/boarding statistics (axis card) 	<p>Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)</p>	<p>When you cease to be a customer with us (5 years from your last activity) or if you notify us that you are not interested in this processing</p>
<p>Marketing of SkiStar's partners' products and services</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Lifestyle-related information • Skiing statistics <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Electronic identification information (your device) • Location data (your unit) • Skiing/boarding statistics (axis card) 	<p>Consent (the registered person has said yes to processing)</p>	<p>When you cease to be a customer with us (5 years from your last activity) or if you notify us that you are not interested in this processing</p>
<p>Marketing of SkiStar and SkiStar's products/services</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details 	<p>Consent (the registered person has said yes to processing)</p>	<p>When you cease to be a customer with us (5 years from your last activity) or if you notify us that you</p>

	<ul style="list-style-type: none"> • Lifestyle-related information • Information about the minor • Skier's details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Electronic identification information (your device) • Location data (your unit) • Skiing/boarding statistics (axis card) 		are not interested in this processing
Marketing and information/communication about EQPE (collected via eqpestore.com)	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Electronic identification information (your device) 	Consent (the registered person has said yes to processing)	3 years from your last activity or if you notify us that you are not interested in this processing
Receiving or delivering the agreed service including complaints	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Bank information • Identity information (incl. national ID number) • Contact details • Purchase details • Information about the minor • Information you provide • Skier's details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) 	Agreement (the registered person has or shall enter into a contract with the data controller)	When the agreement between you and SkiStar expires
Enable entry and purchase in POP by SkiStar shop	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Bank information (if you make a purchase) • Image/video (surveillance camera) • Identity information (incl. national ID number) • Contact details • Purchase details (if you make a purchase) <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) (if you make a purchase) 	<p>When you enter the POP shop: Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)</p> <p>If you make a purchase in the POP shop: Agreement (the registered person has or shall enter into a contract with the data controller)</p>	<p>Up to ten (10) years due to limitation rules</p> <p>When the agreement between you and SkiStar expires</p>

<p>Enabling you to share your social media content on our selected websites</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Image/video • Contact details • Purchase details 	<p>Consent (the registered person has said yes to processing)</p>	<p>3 years from publication or if you choose to unpublish your image.</p>
<p>Personalized digital marketing (delivering customized advertising outside SkiStar through our third-party advertising services based on your user behaviour and profile)</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Contact details 	<p>Consent (the registered person has said yes to processing)</p>	<p>Either when you withdraw your consent or if you notify us that you are not interested in this processing</p>
<p>Registration of foreign guests and visa management</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity information (incl. national ID number) • Contact details • Purchase details • Information about the minor <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) 	<p>Legal obligations (there are laws or regulations that ensure that the personal data controllers must process certain personal data in their business)</p>	<p>When the agreement between you and SkiStar expires</p>
<p>Provide support and customer service incl. handle complaints from guests</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Health information • Identity details • Contact details • Purchase details • Information you provide • Information about the minor • Information about travelling companions <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) • Skiing/boarding statistics (axis card) 	<p>Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)</p>	<p>When you call our customer services we save the conversation with you for 90 days. When you chat/mail us, we save the conversation with you for up to five years. If your case concerns a complaint or complaint, we retain the data for up to ten years due to the statute of limitations rules</p>
<p>Provide support, troubleshooting, enhancement, ordering and other necessary management for SkiStar's IT systems and application-related matters</p>	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Health information • Identity details • Contact details • Purchase details • Information you provide • Information about the minor • Information about travelling companions 	<p>Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)</p>	<p>When you call our customer services we save the conversation with you for 90 days. When you chat/mail us, we save the conversation with you for up to five years.</p>

	<p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) • Electronic identification information (your device) • Skiing/boarding statistics (axis card) 		
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2 FOR YOU WHO ARE A MEMBER OF SKISTAR MEMBER

You can find our full membership conditions [here](#).

By becoming a member of SkiStar Member, the member enters into an agreement with SkiStar in which it is necessary for SkiStar to use personal data as well as other information that the member provides SkiStar with in order to fulfil SkiStar's obligations to the member and administer the parties' contractual relationship. If you do not provide us with your personal data, you cannot become a member of SkiStar Member.

As stated in section 4 of the membership conditions, SkiStar Member has the right to take advantage of unique offers and valuable information from SkiStar and SkiStar's partners, through our various channels. This may also involve creating top lists, tips on training, etc. that we share with members. Among other things, we analyse your previous bookings and purchases, demographic data, interests and other interactions with SkiStar. We process your personal data for these purposes to be able to fulfil our contract with you.

Your personal data may also be processed at an aggregate level for general market/customer analysis and statistics. We may, for example, produce statistics about sales, goods dispatched or offers taken advantage of. We do this based on our legitimate interest in conducting general analyses for greater customer insight and in evaluating, improving and developing our services and products. We do not conduct analysis or follow-up of individual members for these purposes.

If you, as a member, do not want your personal data to be processed for direct marketing purposes, you can submit a written request to SkiStar using the contact details below or unsubscribe directly from our direct marketing mailing list. You may, at any time, unsubscribe from receiving marketing on my page. If you unsubscribe from our mailing list, we will also stop using the profiling underlying the mailing list.

2.1 Personal data that may be processed when you are a SkiStar Member

Below is a description of the personal data we may handle when you integrate with us in our member club. We share personal data in specific personal data categories to make it easier for you to get an overview of what data we may process when. In Section 2.2 we describe what we use these personal data categories for.

Activity days (number of personal book activities that entitles a member to a special level in the offer stages).

Bank information (e.g. bank information, credit/payment card information, account number).

Image/video (e.g. images on SkiPass, camera monitoring (CCTV), images/videos on social media or website, user-generated images within SkiStar Game).

Booking information (e.g. visitor information, travelling companions, booking number, period, destination, which products/activities you have ordered).

Financial information (e.g. payment methods, billing information, income, financial situation, tax situation, shareholding).

Electronic identification information (e.g. IP addresses, device identifiers and cookies, (for information on how we specifically process cookies, see our [cookie policy](#)).

Identity information (e.g. name, customer number, national ID number, date of birth, gender, nationality)

Contact information (e.g. e-mail, mailing address/delivery address, telephone number).

Purchase details (e.g. purchase history, product/service details, bonus points).

Lifestyle-related data (e.g. interests, consumption of goods/services, travel information, friends).

Location data (GPS).

Registration number (vehicles).

Information about the minor (e.g. health information, identity information, contact information, purchase information, skier’s details, skiing statistics). *Contact information and purchase information will only be available if youth (16-18 years) make purchases from us themselves. Skiing statistics are only available if a minor has registered in our member club and is using SkiStar Game.*

Information you provide (e.g. answers to customer surveys, information in correspondence with customer services (e.g. chat, email, phone, during visits).

Information about travelling companions (e.g. health information, identity information, contact information, skier’s details).

Skier’s details (height, weight, shoe size, head size, skills).

Skiing statistics (information about where and when an axe card was used).

2.2 What personal data is used on what legal basis

In the table below, you can read about 1) for what purposes we use your personal data (purpose), 2) which categories of personal data we may use for each purpose and whether we have received the data from you or from another source, 3) on which legal basis we use your data and 4) when we stop processing your data for the specified purposes. If you want to read about when we delete your personal data, see section 5.

Purpose of processing of personal data	Types of personal data and where it comes from (source)	Legal basis for processing under the GDPR	When the purpose of processing
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			ceases
Subscription administration	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Image/video (which you publish) • Identity information (incl. national ID number) • Health information • Contact details • Purchase details • Information about the minor • Information you provide <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) 	Agreement (the registered person has or shall enter into a contract with the data controller)	When your subscription period has ended and you have not renewed your subscription
Administration of discount/benefits within Member	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Activity days • Identity information (incl. national ID number) • Contact details • Purchase details • Registration number • Information about the minor • Information about travelling companions <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) • Skiing/boarding statistics (axis card) 	Agreement (the registered person has or shall enter into a contract with the data controller)	At the latest 30 days after the membership has ended
Administration of your membership	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Image/video (which you publish) • Identity details • Contact details • Purchase details • Lifestyle-related information • Information about the minor • Information you provide • Skier's details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or 	Agreement (the registered person has or shall enter into a contract with the data controller)	At the latest 30 days after the membership has ended

	<p>provider of our share portfolio)</p> <ul style="list-style-type: none"> • Skiing/boarding statistics (axis card) 		
Administration of the Game function (if you have chosen to activate SkiStar Game) incl. sharing of leaderboards etc.	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Image/video (which you publish) • Identity details • Contact details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) • Electronic identification information • Location data • Skiing/boarding statistics (axis card) 	Agreement (the registered person has or shall enter into a contract with the data controller)	At the latest 30 days after the membership has ended
Analysis and statistics	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Bank information • Identity details • Contact details • Purchase details • Lifestyle-related information • Information about the minor • Information you provide • Skier's details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information (e.g. payment service provider or provider of our share portfolio) • Electronic identification information (your device) • Location data (your unit) • Skiing/boarding statistics (axis card) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	At the latest 30 days after the membership has ended
Improve/develop SkiStar products and services (via a focus group or similar)	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Information about travelling companions 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the	Occurs for as long as SkiStar is otherwise entitled to store your data, for example because you are a member

	<p><u>Information from others other than yourself:</u> Booking information (SkiStar)</p>	purpose)	or in order to comply with the law or fulfil an agreement with you
Conducting customer surveys	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Lifestyle-related information • Information you provide <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Skiing/boarding statistics (axis card) 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	At the latest 30 days after the membership has ended or when you notify us that you are not interested in this processing
Handling and delivery of other non-commercial messages (general information, etc.)	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Information about the minor • Information you provide <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) 	Agreement (the registered person has or shall enter into a contract with the data controller)	At the latest 30 days after the membership has ended
Customer segmentation and profiling (see in particular section 3)	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Lifestyle-related information • Information about the minor • Skier's details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Financial information • Electronic identification information (your device) • Skiing/boarding statistics (axis card) 	Agreement (the registered person has or shall enter into a contract with the data controller)	At the latest 30 days after the membership has ended
Marketing of SkiStar's partners' products and services	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Lifestyle-related information • Location data <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) 	Agreement (the registered person has or shall enter into a contract with the data controller)	At the latest 30 days after the membership has ended or when you notify us that you are not interested in this processing

	<ul style="list-style-type: none"> • Electronic identification information (your device) • Skiing/boarding statistics (axis card) 		
Marketing of SkiStar and SkiStar's products/services	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Lifestyle-related information • Information about the minor • Skier's details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Electronic identification information (your device) • Location data (your unit) • Skiing/boarding statistics (axis card) 	Agreement (the registered person has or shall enter into a contract with the data controller)	At the latest 30 days after the membership has ended or when you notify us that you are not interested in this processing
Personalized digital marketing (delivering customized advertising outside SkiStar through our third-party advertising services based on your user behaviour and profile)	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Contact details 	Balancing of interests (the interests of the data controller weighs than that of the data subject and processing is necessary for the purpose)	At the latest 30 days after the membership has ended or when you notify us that you are not interested in this processing
Present attractive Member offers and information on SkiStar's digital channels	<p><u>Information from you:</u></p> <ul style="list-style-type: none"> • Identity details • Contact details • Purchase details • Lifestyle-related information • Information about the minor • Skier's details <p><u>Information from others other than yourself:</u></p> <ul style="list-style-type: none"> • Booking information (SkiStar) • Electronic identification information (your device) • Location data (your unit) <p>Skiing/boarding statistics (axis card)</p>	Agreement (the registered person has or shall enter into a contract with the data controller)	At the latest 30 days after the membership has ended

3 ESPECIALLY REGARDING PROFILING

Profiling in accordance with the GDPR means processing of personal data in order to assess certain personal characteristics of you as a customer or member. We do this by analysing your data and thus trying to predict your purchasing behaviour or interests. By being able to predict your interests or your future buying behaviour, we have an opportunity to constantly

improve our communication and our offers according to your needs. Examples of profiling activities we carry out include:

- Predict your travel preferences based on the destinations and activities you've previously purchased or viewed, and then display promotions we think you'll like across our digital channels.
- Predict what offers may be most interesting to you based on your previous purchases with SkiStar, where you, for example, if you're staying out with your family, you get offers at our best family accommodation.
- Analyse and draw conclusions about what type of trip you are likely to be interested in, such as make offers on a relevant trip.

Profiling that we perform is within the framework of the purpose of "Marketing and information about SkiStar and SkiStar's products/services" for members or private customers who have given their consent to marketing sent. During processing, it is clear which categories of personal data we use for processing and profiling as well as which legal basis we perform this on.

We do not perform so-called automated decision-making that has legal consequences or otherwise significantly affects you.

4 TO WHOM WE PROVIDE PERSONAL DATA

To be able to fulfil the booking you have made with us and to carry out our business, we may need to share your personal data with our sub-suppliers and partners. We only share personal data with them to the extent necessary for them to be able to provide their services to you and us, and they only have access to the personal data that is necessary.

Sub-suppliers

In order to fulfil the purposes of our processing of your personal data, we share your personal data with companies that provide services to SkiStar, for example to manage the mailing and delivery of your goods or to provide you with free parking. These companies may only process your personal data in accordance with our explicit instructions and must not use your data for their own purposes. They are also required by law and contracts to protect your personal data.

Providers of travel-related services

In some cases, we also share your personal data with companies that provide services directly to you on behalf of SkiStar, such as payment services companies, transport companies, ski school and property brokers such as hotels. Such providers will only have access to the personal data needed to complete the booking. These providers are independently responsible for processing personal data in accordance with their own data protection policy.

IT suppliers

We use a number of different IT services and IT systems in our business, and in some of these personal data is stored and handled. Some systems are installed locally with us and it is only

our staff who have access to the data. In these cases, there is no transfer to third parties. Some systems, however, are cloud solutions or installed by the provider, which means that we transfer personal data to the provider. In such cases, the provider is our data processor and handles the data on our behalf and under our instructions.

Web analytics and social media companies

We use external providers for personalisation and analysis of user behaviour on our websites and for user feedback. The data is primarily collected via cookies and is handled at an anonymous and aggregated level. For example, you may see advertising when you are on other websites and apps, such as on social media. This is delivered to you through our third-party advertising services. See more under the purpose "Personalized digital marketing" or in our [cookie policy](#).

Within SkiStar

Our Privacy Policy applies to all group companies and subsidiaries of SkiStar, which means that SkiStar AB has the same access to personal data as the specific destination or department you were in contact with locally, but with the restriction that an individual employee can only see such information as is relevant for carrying out his/her working duties.

Authority

If we are required or permitted by law, we may share personal data with the state and authorities to the extent necessary.

5 AS LONG AS WE STORE YOUR PERSONAL DATA

We never keep data for longer than we need to and only use your personal data for the purposes set out in this policy (see columns in sections 1.2 and 2.2). After this time, we will safely remove your personal data. However, the same personal data may be stored for different purposes, which means that we may delete a data from one system when it is no longer needed there, while at the same time it may continue to be stored in another system if the purpose for that processing remains. If data is needed after this period for analytical, historical or other legitimate commercial purposes, we will take appropriate steps to anonymise the data so that it no longer constitutes personal data.

How long we store your personal data depends on the purposes for which we use the data.

1. Personal data that we are required to store under current law is stored for as long as required by law, such as data in connection with accounting legislation stored for 7 years.
 - a) If there is a legal requirement, this means that SkiStar may not delete your personal data even if you request it to be deleted (read more about your rights in the section 8).
2. Personal data used for the contractual relationship between you and SkiStar is normally stored for the duration of the contract and thereafter for a maximum of 10 years due to

the rules on limitation (processing is necessary to establish, assert or defend legal claims).

- b) We may also store data necessary for the establishment, exercise or defence of legal claims on the basis of our legitimate interest, which means that you do not necessarily have to have entered into a contract with us. Data stored for this reason will not be deleted by SkiStar even if you request it (read more about your rights in section 8).
3. The personal data we collect and that is not necessary in view of limitation rules or in order to comply with laws or contracts (see paragraphs 1 and 2 above), is stored in our customer database for five years on the basis of our legitimate interest. If you interact with us within five years, data about previous bookings/products will be saved for another five years. The personal data is stored for your own benefit, but also as a basis for market and customer analysis and for statistical purposes in order to provide you with a better booking offer and better service.
4. Personal data that we process within the framework of your consent will be kept as long as the consent is valid and you do not withdraw it.

6 COOKIES

On skistar.com, skistarshop.com and epestore.com we use cookies to improve your experience, to gather information for marketing purposes and to develop our web pages. We are not able to identify you as a visitor to our websites using this information, but because an IP address is regarded as a personal data, we will let you know about such processing. In addition to this privacy policy, our cookie policy. For skistar.com and skistarshop.com [this cookie policy](#) applies and for epestore.com [this cookie policy](#) applies.

7 CAMERA SURVEILLANCE

Around SkiStar's destinations, SkiStar uses camera surveillance with the aim of preventing, detecting and investigating criminal acts in buildings and facilities where SkiStar operates, and to protect staff and visitors and the company's property from crime and accidents. You can find more information about our camera surveillance [here](#).

8 YOUR RIGHTS AS A REGISTERED

Right to information

You have the right to be informed about how we process your personal data. We do this through this privacy policy and by answering any questions from you.

Get access to your personal data.

In addition to the online access you have to personal data related to My Page or your booking, you also have a right to a copy of the personal data that we hold about you and information on how we process it. If we receive a request for extract, we may ask for additional information to ensure that we provide the data to the right person.

Right of objection

For processing performed on the basis of a legitimate interest, you always have the right to object, in accordance with the data protection regulation. We will then perform a balancing of interests based on your specific situation to assess whether it is still legitimate to process your personal data for the specified purposes.

Unsubscribe from direct advertising

You may unsubscribe from our direct marketing mailing list at any time by clicking on a link in the mailing list, under your Settings on "My Page" at skistar.com or by contacting us using the contact information below.

Right to withdraw consent

You can select to withdraw your consent at any time through your consent setting on "my page", or contact us at the contact details below. If you revoke your consent, we will stop any processing that was covered by that consent.

It can happen that the same personal data is being processed both on the basis of your consent and on the basis that it is necessary for us to fulfil a contract with you. This means that, even if you revoke your consent and such processing as is based on that consent ceases, it may still be necessary for us to retain your personal data for other purposes.

Right to data portability

In case of automated processing based on your consent or contracts where personal data is collected directly from you, you have a right to data portability, which means that you have the right to request your personal data in a structured, generally used and machine-readable format.

Right to correction, deletion or limitation

You have the right to request that data about you be deleted, supplemented or corrected. If you consider that data about you is incorrect or incomplete, you have the right to request that data be corrected or supplemented. You also have the right to request that the processing of your personal data is limited in certain circumstances, for example while we rectify it.

If you would like to have your data deleted, you can contact us at personuppgift@skistar.com. You can also request deletion of your personal data via our SkiStar app. If we receive a request for deletion by e-mail, we may ask for additional information to ensure that you are. However, please note that if we still have a legitimate reason for storing your data, for example by law or agreement, your request may be rejected in whole or in part.

Right to lodge a complaint with the regulatory authority

If you feel that we handle your personal data incorrectly, you have the right to submit a complaint to the Swedish Privacy Authority. Read more on the Swedish Privacy Authority's [website](#).

How do you exercise your rights?

If you have any questions about the processing of your personal data, want to submit a complaint or exercise any of your rights, you are welcome to contact us using the contact information below.

dpo@skistar.com

or send a letter to

SkiStar AB, Att: DPO
Fjällvägen 25
780 91 Sälen

9 CHANGES TO THIS PRIVACY POLICY

We may change this privacy policy from time to time and all changes take effect automatically thirty (30) days after they have been published on skistar.com. In the event of a change being particularly relevant or substantial, you will be notified accordingly. If we make changes to the privacy policy that are considered necessary to comply with obligations under laws, government advice or decisions, the new privacy policy may apply immediately after it has been published on skistar.com.