

PRIVACY POLICY (VERSION 2026-02)

WE PROTECT YOUR PERSONAL DATA

Your trust is important to us at SkiStar ("SkiStar", "we", "us"). Our goal 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.

Personal data is any kind of information that can be directly or indirectly attributed to a natural person who is alive. In this information text, we describe how and why SkiStar processes personal data when you as a private individual shop at SkiStar, skistar.com, skistarshop.com, integrate with us via our customer club SkiStar Member or use our app. Terms and conditions for the member club, booking conditions and purchase conditions can be found [here](#). Terms and conditions for using our app can be found on the App Store and Google Play.

SkiStar conducts all processing of personal data in accordance with the EU's data protection legislation GDPR. The data controller for the processing of your personal data is SkiStar AB unless otherwise stated 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 it is therefore to SkiStar AB that you should turn with questions or to exercise your rights. See more about how to exercise your rights in section 10.

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1 PERSONAL DATA THAT MAY BE PROCESSED WHEN YOU INTERACT WITH US

Below is a description of the personal data we may process when you integrate with us. We have divided the personal data into specific categories of personal data to make it easy for you to get an overview of what data we may process and when. In the following sections below, we describe for what we use these categories of personal data.

Activity days (number of personalized booked activities that entitle a member to a specific level in the offer ladder).

Bank details (e.g., bank, credit/debit card details, account number)

Image/video (e.g., image on SkiPass, camera surveillance (CCTV), images/videos on social media or website that you either publish yourself or that we publish with your approval, user-generated images within SkiStar Game).

Booking details (e.g., co-travelers, minors, health details, rider details, booking number, length of trip, destination, products/activities booked)

Financial information (e.g., payment methods, billing information, shareholdings)

Electronic identification data (e.g. IP addresses, device identifiers and cookies - for information on how we use cookies in particular, see our [cookie policy](#)).

Health data (e.g., allergy, disability, medical certificate, body measurements, medical condition, data related to injury)

Identity data (e.g., name, customer number, social security number (*used in specific cases and printed separately*), date of birth, gender, nationality)

Contact details (e.g., e-mail address, postal/delivery address, telephone number)

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

Lifestyle-related data (e.g., interests, friends).

Location data (GPS).

Registration number (vehicle).

Co-traveler information (e.g., Health information, Identity information, Contact information, Carpool information).

Data on minors (e.g., Health data, Identity data, Contact data, Purchase data, Location data, Travel data, Travel statistics). *Contact details and Purchase details only appear if the young person (16-18 years) makes a purchase from us. Ride statistics and location data only appear if the minor has registered with our member club and is using SkiStar Game and has activated location sharing.*

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

Rider data (e.g., height, weight, shoe size, head size, riding ability)

Trip statistics (information on where and when access cards have been used).

2 FOR PRIVATE CUSTOMERS OR FELLOW TRAVELERS

When you interact with us as a private customer or fellow traveler, we process your personal data. The personal data we process depends on the way you interact with us, for example when you book a trip or activity for you or your fellow traveler on skistar.com or buy a product on skistarshop.com. When you

book a trip/activity or buy a product, we primarily process your data to be able to fulfill the agreement 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 to constantly improve our products and services and to be able to give you a memorable mountain experience. In the table below, you can read 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 received the data from you or another source, 3) the legal basis on which we use your data and 4) when we stop processing your data for the stated purpose. If you want to read about when we delete your personal data, see section 7.

Purposes of processing the personal data	Types of personal data and where they come from (source)	Legal basis for processing under the GDPR	When the purpose of the treatment ends
Administration of booking for sharing activity days	<u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Identity details (your fellow traveler) • Contact details (your fellow traveler) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Whichever comes first: May 15 after the activity date has passed or if you notify us that you are not interested in this treatment
Administration of booking/cancellation incl. all communication before, during and after your booking/cancellation linked to your contract with us	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Bank details • Image/video • Health data • Identity data (including social security number) • Contact details • Purchase details • Registration number • Indication of co-traveler • Information on minors • Information you provide • Carriage details <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) 	Contract (you have, or will enter, a contract with us)	When the agreement between us ends
Administration of queue time function in SkiStar's app, digital screens and on skistar.com	<u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Electronic identification data (your device) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	The data are stored temporarily (a few seconds) for the technical processing strictly necessary to calculate the waiting time data
Administration of accommodation for guests	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Health data • Identity data • Contact details • Purchase details • Registration number 	Contract (you have, or will enter, a contract with us)	When the agreement between us ends

	<ul style="list-style-type: none"> • Indication of co-traveler • Information on minors • Information you provide <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) • Location data (if enabled on your device) 		
Administration of discounts/benefits (incl. administering discounts together with our partners) and communicating with you about this if required	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Identity data (including social security number) • Contact details • Purchase details • Registration number • Information on minors <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) • Driving statistics (axess card) 	Contract (you have, or will enter, a contract with us)	When the agreement between us ends
Claims administration (both when we take care of you and when you contact us)	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Health data • Identity data (including social security number) • Contact details • Indication of co-traveler • Information on minors • Information you provide <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) • Driving statistics (axess card) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Up to ten (10) years due to statute of limitations rules
Administration of the SkiStar website and app	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Image/video • Identity data • Contact details • Lifestyle-related tasks • Information on minors • Information you provide <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Electronic identification data (your device) • Location data (if enabled on your device) • Driving statistics (axess card) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Occurs throughout the time SkiStar otherwise has the right to save your data, for example because you are a customer or to comply with the law or fulfill an agreement with you

Administration of SkiStar's social media (publishing/marketing, running competitions, managing comment fields and direct messages)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Image/video • Identity data • Contact details • Information you provide <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Electronic identification data (your device) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Occurs throughout the time SkiStar otherwise has the right to save your data, for example because you are a customer or to comply with the law or fulfill an agreement with you
Administering the accounts	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Bank details • Identity data • Contact details • Purchase details <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) 	Legal obligation (there are laws or regulations that require us to process certain personal data in our business)	During the compilation of the accounts and for 7 years after the end of the year in which the data were recorded
Manage your customer account on our digital platforms	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Image/video • Identity data (including social security number if you choose) • Contact details • Carriage details 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	When you stop being our customer (5 years from your last activity)
Administering insurance policies and handling insurance claims (which we mediate)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data (including social security number) • Health data • Contact details 	Contract (you have, or will enter, a contract with us)	When the agreement between us ends
Manage reviews left on skistarshop.com	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Information you provide <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Occurs throughout the time SkiStar otherwise has the right to save your data, for example because you are a customer or to comply with the law or fulfill an agreement with you
Analysis and statistics	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Indication of co-traveler 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Occurs throughout the time SkiStar otherwise has the right to save your data, for example because you are a customer or to comply with the law or fulfill an agreement with you

	<ul style="list-style-type: none"> • Information on minors • Information you provide • Carriage details <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) • Electronic identification data (your device) • Location data (if enabled on your device) • Driving statistics (axess card) 		
Improve/develop SkiStar products and services (through focus group or similar)	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Indication of co-traveler <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Occurs throughout the time SkiStar otherwise has the right to save your data, for example because you are a customer or to comply with the law or fulfill an agreement with you
Conduct customer surveys for SkiStar (if you have a contract with us)	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Information you provide <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) • Driving statistics (axess card) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Up to one year from the end of the contract or when you inform us that you are not interested in this processing
Conduct customer surveys with our partners (if you have an agreement with us)	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Identity data • Contact details <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Up to one year from the end of the contract or when you inform us that you are not interested in this processing
Manage ticket sales and payments via Tickster for specific events	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Bank details • Identity data • Contact details <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) 	Contract (you have, or will enter, a contract with us)	When the agreement between us ends
Dealing with breaches of SkiStar's terms and conditions	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Image/video • Electronic data 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Up to ten (10) years due to statute of limitations rules

	<ul style="list-style-type: none"> • Health data • Identity data (including social security number) • Contact details • Purchase details • Registration number • Indication of co-traveler • Information on minors • Information you provide <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Image/video (surveillance camera) • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) • Location data (if enabled on your device) • Driving statistics (axess card) 	data processed)	
Managing purchases made on skistarshop.com (including delivery and returns/complaints)	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Bank details • Financial information • Identity data (including social security number) • Contact details • Purchase details • Information you provide • Skier details (if you buy mounted ski equipment) <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) 	Contract (you have, or will enter, a contract with us)	When the agreement between us ends
Manage and implement SkiStar events and similar (that you have chosen to participate in)	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Image/video • Identity data (including social security number) • Contact details • Purchase details • Information on minors • Information you provide • Carriage details <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) 	<p>If you participate in events you have registered for: Contract (you have, or will enter, a contract with us)</p> <p>If you are participating in a free event: Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)</p>	<p>When the agreement between us ends</p> <p>When the event has taken place and SkiStar's purpose for processing personal data has ended</p>
Manage and deliver other non-commercial messages (general information and the like in the context of your booking or purchase)	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Indication of co-traveler 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Up to ten (10) years due to statute of limitations rules

	<ul style="list-style-type: none"> • Information on minors • Information you provide <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) 		
Customer segmentation	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Indication of co-traveler • Information on minors • Carriage details <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) • Electronic identification data (your device) • Driving statistics (axess card) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	When you cease to be our customer (5 years from your last activity) or if you inform us that you are not interested in this treatment
Marketing of SkiStar and SkiStar's products/services (via telephone, e-mail, and SMS)	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Information on minors • Carriage details <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) • Electronic identification data (your device) • Location data (if enabled on your device) • Driving statistics (axess card) 	Consent (you have agreed to the processing)	When you cease to be our customer (5 years from your last activity) or if you inform us that you are not interested in this treatment
Marketing of SkiStar's partners' products and services (via email and SMS)	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Yearly statistics <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) • Electronic identification data (your device) • Location data (if enabled on your device) 	Consent (you have agreed to the processing)	When you cease to be our customer (5 years from your last activity) or if you inform us that you are not interested in this treatment

	<ul style="list-style-type: none"> • Driving statistics (access card) 		
Receiving or delivering the agreed service/product, including complaints	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Bank details • Identity data (including social security number) • Contact details • Purchase details • Information on minors • Information you provide • Health data • Carriage details <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) 	Contract (you have, or will enter, a contract with us)	When the agreement between us ends
Enable you to share content from your social media on our selected websites	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Image/video • Contact details • Purchase details 	Consent (you have agreed to the processing)	3 years from publication or if you choose to unpublish your image
Enable entry and purchase in POP by SkiStar store	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Bank details (if you make a purchase) • Image/video (surveillance camera) • Identity data (including social security number) • Contact details • Purchase details (if you make a purchase) <p><u>Data that comes from someone other than you:</u></p> <p>Booking details (SkiStar) (if you make a purchase)</p>	<p>When you enter the POP store: Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)</p> <p>If you make a purchase in the POP store: Contract (you have, or will enter, a contract with us)</p>	<p>Up to ten (10) years due to statute of limitations rules</p> <p>When the agreement between us ends</p>
Personalized digital marketing (delivering customized advertising outside SkiStar through our third-party advertising services based on your user behavior and profile)	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Contact details 	Consent (you have agreed to the processing)	Either when you withdraw your consent or if you inform us that you are not interested in this processing
Registration of foreign guests and visa processing	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Identity data (including social security number) • Contact details • Purchase details • Information on minors 	Legal obligation (there are laws or regulations that require us to process certain personal data in our business)	When the agreement between us ends

	<u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) 		
Providing support and customer service including handling guest complaints	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Health data • Identity data • Contact details • Purchase details • Indication of co-traveler • Information on minors • Information you provide <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) • Driving statistics (axess card) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	<p>When you call our customer service, we save the conversation with you for 90 days</p> <p>When you chat/email with us, we save the conversation with you for up to five years</p> <p>If your case concerns a complaint or a claim, we will keep the data for up to 10 years due to statute of limitations rules</p>
Provide support, troubleshooting, enhancement, ordering and other necessary management for SkiStar IT systems and application related issues	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Health data • Identity data • Contact details • Purchase details • Registration number • Indication of co-traveler • Information on minors • Information you provide <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) • Electronic identification data (your device) • Driving statistics (axess card) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	<p>When you call our customer service, we save the conversation with you for 90 days.</p> <p>When you chat/email with us, we keep the conversation with you for up to five years.</p>

3 FOR THOSE WHO ARE MEMBERS OF SKISTAR MEMBER

By becoming a SkiStar Member, you enter into an agreement with SkiStar under which it is necessary for SkiStar to use personal data and other information that you provide to us. You can find the full membership terms [here](#). If you do not provide us with your personal data, you cannot become a SkiStar Member.

As stated in section 4 of the membership terms and conditions, as a SkiStar Member you are entitled to receive unique offers and valuable information from us and our partners through our various channels. This may also include the creation of top lists, tips on training, etc. that we share with you as a member.

We analyze, among other things, your previous bookings and purchases, demographic data, interests, and other interactions with SkiStar. We process your personal data for this purpose to fulfill the agreement with you.

Your personal data may also be processed at an overall level for general market/customer analysis and statistics. For example, we may produce statistics on sales, mailings or utilized offers. We do this based on our legitimate interest in conducting general analyses for increased customer insight and to evaluate, improve and develop our services and products. We do not analyze or follow up on individual members for these purposes.

If you as a member do not want your personal data to be processed for direct marketing or profiling purposes, you can submit a written request to this effect to us at the contact details below, or you can unsubscribe directly from our direct marketing mailing. You can also unsubscribe from receiving marketing at any time on "my page". If you unsubscribe from our mailings, we will also stop the profiling that forms the basis for the mailings.

In the table below you can read 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 received the data from you or another source, 3) the legal basis on which we use your data and 4) when we stop processing your data for the stated purpose. If you want to read about when we delete your personal data, see section 7.

Purposes of processing the personal data	Types of personal data and where they come from (source)	Legal basis for processing under the GDPR	When the purpose of the treatment ends
Subscription administration (including related communication)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Image/video • Health data • Identity data (including social security number) • Contact details • Purchase details • Information on minors • Information you provide <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) 	Contract (you have, or will enter, a contract with us)	When the subscription period is over, and you have not renewed your subscription
Administration of digital receipts (providing receipt, offering support, etc.)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) 	Contract (you have, or will enter, a contract with us)	No later than 30 days after termination of membership
Administration of your membership (including managing your membership account on our digital platforms)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Image/video (that you publish) • Identity data (including social security number if you choose) • Contact details 	Contract (you have, or will enter, a contract with us)	No later than 30 days after termination of membership

	<ul style="list-style-type: none"> • Purchase details • Lifestyle-related tasks • Information on minors • Information you provide • Carriage details <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) • Driving statistics (axess card) 		
Administration of the Game function (if you have chosen to activate SkiStar Game) including sharing of leaderboards etc.	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Image/video (that you publish) • Identity data • Contact details <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Electronic identification data (your device) • Location data (if enabled on your device) • Driving statistics (axess card) 	Contract (you have, or will enter, a contract with us)	No later than 30 days after termination of membership
Administration of discounts/benefits within Member	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Activity days • Identity data (including social security number) • Contact details • Purchase details • Registration number • Indication of co-traveler • Information on minors <p><u>Data that comes from someone other than you:</u></p> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) • Driving statistics (axess card) 	Contract (you have, or will enter, a contract with us)	No later than 30 days after termination of membership
Analysis and statistics	<p><u>Data that comes from you:</u></p> <ul style="list-style-type: none"> • Bank details • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Information on minors • Information you provide • Carriage details 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	No later than 30 days after termination of membership

	<u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information (e.g., payment service provider or provider of our share register) • Electronic identification data (your device) • Location data (if enabled on your device) • Driving statistics (axess card) 		
Improve/develop SkiStar products and services (through focus group or similar)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Indication of co-traveler <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Occurs throughout the time SkiStar otherwise has the right to save your data, for example because you are a member or to comply with the law or fulfill an agreement with you
Conduct customer surveys	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Information you provide <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Driving statistics (axess card) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	No later than 30 days after the end of your membership or when you inform us that you are not interested in this processing
Managing and delivering other non-commercial messages (general information, etc.)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Information on minors • Information you provide <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) 	Contract (you have, or will enter, a contract with us)	No later than 30 days after termination of membership
Communication with the guardian of a minor member	<u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Contact details (of the minor) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	No later than 30 days after the termination of the minor's membership
Communication about your membership (e.g., activity days earned, bonus points, new membership year, etc.)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Location data 	Contract (you have, or will enter, a contract with us)	No later than 30 days after termination of membership

	<u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Electronic identification data (your device) • Driving statistics (axess card) 		
Customer segmentation and profiling (see specific section 5)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Information on minors • Carriage details <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Financial information • Electronic identification data (your device) • Driving statistics (axess card) 	Contract (you have, or will enter, a contract with us)	No later than 30 days after termination of membership
Marketing of SkiStar and SkiStar products/services (both digital and postal)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Activity days • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Information on minors • Carriage details <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Electronic identification data (your device) • Location data (if enabled on your device) • Driving statistics (axess card) 	Contract (you have, or will enter, a contract with us)	No later than 30 days after the end of your membership or when you inform us that you are not interested in this processing
Marketing of SkiStar's partners' products and services (both digital and postal)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Location data <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Electronic identification data (your device) • Driving statistics (axess card) 	Contract (you have, or will enter, a contract with us)	No later than 30 days after the end of your membership or when you inform us that you are not interested in this processing
Personalized digital marketing (delivering customized advertising outside SkiStar through	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Contact details 	Legitimate interest (SkiStar's interest in processing your data has been deemed to	No later than 30 days after the end of your membership or when you inform

our third-party advertising services based on your user behavior and profile)		outweigh your interest in not having your data processed)	us that you are not interested in this processing
Present favorable member offers and information in SkiStar's digital channels	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Purchase details • Lifestyle-related tasks • Information on minors • Carriage details <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Electronic identification data (your device) • Location data (if enabled on your device) • Driving statistics (axess card) 	Contract (you have, or will enter, a contract with us)	No later than 30 days after termination of membership

4 FOR THOSE WHO USE OUR APP

When you use the SkiStar app, we process personal data in order to provide the app's features and services. The data we process depends on how you interact with the app, for example when booking, purchasing, using map features, or contacting our AI agent. Terms of use can be found on the App Store or Google Play.

Specifically on location data (GPS)

The processing of location data takes place locally on your mobile phone but will also be stored on our servers to enable the promised functionality and for statistical purposes to further develop our services. If you want to change the app's access to your location data, go to the settings of your mobile phone. We only collect data during your stay and within the limits of our in-app map coordinates.

If you agree to allow our app to use your location data via your mobile phone settings, your location data will be used to display your current position on a map of the destination, nearby places, restaurants, and events. If you have authorized it, your current location data may also be visible to others in the app.

In the table below you can read 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 received the data from you or another source, 3) the legal basis on which we use your data and 4) when we stop processing your data for the stated purpose. If you want to read about when we delete your personal data, see section 7.

Specifically about SkiStar's AI agent

The app contains an AI-based feature that can answer questions and help you with tasks. Information you provide in chat, including text and images, is processed to provide you with service and handle tasks. Images are stored temporarily and deleted according to established procedures. The AI agent's responses are automatically generated and should be viewed as guidance. We do not make any automated decisions that have legal consequences. Interactions may be logged for troubleshooting and service improvement. Logs are pseudonymized or anonymized once the purpose has been achieved.

Purposes of processing the personal data	Types of personal data and where they come from (source)	Legal basis for processing under the GDPR	When the purpose of the treatment ends
Analysis and statistics	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Location data (if enabled on your device) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	What comes first: You stop being our customer or delete your user
Using our AI agent	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Image/video • Identity data • Contact details • Information you provide <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Location data (if enabled on your device) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	14 days after the conversation with the AI agent has ended. 2w1
Conduct purchases/bookings of SkiStar products and services	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Bank details • Financial information • Identity data • Contact details • Purchase details <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Electronic identification data (your device) 	Contract (you have, or are about to enter, a contract with us - in this case when you have accepted our app terms of use)	Up to ten (10) years due to statute of limitations rules
Managing violations of our application's terms and conditions	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Image/video • Identity data • Contact details • Information you provide <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Location data (if enabled on your device) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	Up to ten (10) years due to statute of limitations rules
Manage and deliver non-commercial messages (e.g., terms and conditions update or similar)	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data • Contact details • Information you provide 	Contract (you have, or are about to enter, a contract with us - in this case when you have accepted our app terms of use)	What comes first: You stop being our customer or delete your user
Enable you to use our map features, including sharing location data with other users (NOTE: Location sharing is only available to SkiStar)	<u>Data coming from you</u> <ul style="list-style-type: none"> • Identity data • Contact details 	Consent (you have agreed to the processing)	Whichever comes first: You cease to be a customer of ours, delete your user or when you turn off location data sharing

Members)	<u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Location data (if enabled on your device) 		on your device
Enable login and display details of upcoming booking/purchase	<u>Data that comes from you:</u> <ul style="list-style-type: none"> • Identity data (incl. social security number if you use BankID as login method) • Contact details <u>Data that comes from someone other than you:</u> <ul style="list-style-type: none"> • Booking details (SkiStar) • Electronic identification data (your device) 	Legitimate interest (SkiStar's interest in processing your data has been deemed to outweigh your interest in not having your data processed)	What comes first: You stop being our customer or delete your user

5 SPECIFICALLY ON PROFILING

Profiling under the GDPR means processing personal data to assess certain personal characteristics of you as a customer or member. We do this by analyzing your data and thus trying to predict your buying behavior or interests. By being able to predict your interests or future purchasing behavior, we have an opportunity to constantly improve our communication and offers according to your needs. Examples of profiling activities we perform are:

- Predict your travel preferences based on the destinations and activities you have previously purchased or viewed and then display promotions, which we think you will like, in our digital channels.
- Predict which offers may be of most interest to you based on your previous purchases at SkiStar, where, for example, if you have traveled with your family, you will receive offers on our best family accommodation.
- Analyze and draw conclusions about the type of trip you are likely to be interested in and e.g., make an offer for a relevant trip.

Profiling that we conduct is done for the purpose of "Marketing and information about SkiStar and SkiStar's products/services" for those who are Member members or for those who are private customers and have consented to marketing mailings. The categories of personal data that we use within the framework of processing and profiling and the legal basis on which we do this are stated during processing.

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

6 TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA

To fulfill the agreement with you and to otherwise conduct our business, we may need to share your personal data with our subcontractors and partners. We only share personal data with them to the extent necessary for them to provide their services to you/us and they will only have access to the personal data that is necessary.

Subcontractors

To fulfill 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 dispatch 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 may not use your data for their own purposes. They are also legally and contractually obliged to protect your personal data.

Suppliers 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 service companies, transportation companies, ski schools and accommodation providers such as hotels. Such suppliers only have access to the personal data needed to fulfill the booking. These suppliers are independent data controllers and are responsible for and manage personal data in accordance with each supplier's privacy policy.

IT suppliers

We use a number of different IT services and systems in our operations, some of which store and process personal data. Some systems are installed locally with us and only our staff have access to the data. In these cases, there is no transfer to third parties. However, some systems are cloud solutions or installed at the provider's premises and involve us transferring personal data to the provider. In these cases, the provider is our data processor and processes the data on our behalf and according to our instructions.

Web analytics and social media companies

We use external providers for personalization and analysis of user behavior on our websites and for user feedback. The data involved is data collected through cookies and processed at an anonymous and aggregated level. For example, you may see advertising when you are on other websites and apps, such as 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 and subsidiary companies within SkiStar, which means that SkiStar AB has the same access to personal data as the specific destination or department you have been in contact with locally. However, with the limitation that the individual employee can only see information that is relevant to the performance of their duties.

Authority

If we are required by law or if the law allows, we may share personal data with government and public authorities to the extent necessary.

7 HOW LONG WE KEEP YOUR PERSONAL DATA

We will never keep data longer than we need to and will only use your personal data for the purposes set out in this policy. Thereafter, we will securely delete your personal data. However, the same personal data may be stored for different purposes, which means that we may delete data from one system when it is no longer needed there, while the data 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 anonymize that data so that it no longer constitutes personal data.

How long we keep your personal data depends on the purpose for which we use the data

1. Personal data that we are required to keep by law is kept for as long as the law requires, such as data required by accounting legislation, which is kept for 7 years.
 - a. If there are legal requirements, this means that SkiStar may not delete your personal data even if you request that it be deleted (read more about your rights in section).10
2. Personal data used for the contractual relationship between you and SkiStar is normally saved for as long as the contract is valid and thereafter for a

maximum of 10 years due to rules on limitation (processing is necessary to establish, exercise or defend legal claims).

- b. We may also store data that is necessary for the establishment, exercise, or defense of legal claims based on our legitimate interest, which means that you do not necessarily need to have entered 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 10).
3. The personal data we collect, and which is not necessary in view of limitation rules or for legal or contractual compliance (see points 1 and 2 above), will be kept in our customer database for five years based on our legitimate interest. If you interact with us within five years, data on previous bookings/products will be stored for another five years. The personal data is stored for your own sake, but also as a basis for market and customer analyzes and for statistical purposes to provide you with better booking offers and better service.
4. Personal data that we process in the context of your consent will be kept if the consent is valid and you do not withdraw it.

8 COOKIES

On skistar.com and skistarshop.com we use cookies to improve your experience, to collect information for our marketing and to develop the websites. We cannot identify you as a visitor to our websites using this data, but since an IP address is considered personal data, we inform you about the processing. In addition to this privacy policy, our cookie policy also applies to this processing. For skistar.com and skistarshop.com [this cookie policy](#) applies.

9 CAMERA SURVEILLANCE

Throughout SkiStar's destinations, SkiStar uses camera surveillance with the aim of preventing, detecting, and investigating criminal acts within buildings and facilities where SkiStar operates and to protect staff and visitors and company property from crime and accidents. More information about the camera surveillance we carry out can be found at [skistar.com](#).

10 YOUR RIGHTS AS A DATA SUBJECT

Right to information

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

Right to access your personal data

In addition to having online access to the personal data related to "my page" or your booking, you have the right to receive a copy of the personal data we hold about you and information on how we process it through a so-called "extract from the register". If we receive a request for an extract, we may ask for additional information to ensure that we disclose the data to the right person.

Right to object

Processing conducted based on our legitimate interest, you always have the right to object under the GDPR. In this case, we will balance the interests based on your specific situation to assess whether there is still a legitimate reason for us to process your personal data for the stated purpose.

Opt out of direct mail

You can opt out of our direct marketing emails at any time by clicking on a link in the email, under your settings on "my page" on skistar.com or by contacting us at the contact details below.

Right to withdraw consent

You can choose to withdraw your consent at any time through your consent settings on "my page" or alternatively contact us using the contact details below. If you withdraw your consent, we will cease the processing that was subject to the consent.

It may happen that the same personal data is processed both based on consent and on the basis that the data is necessary for us to fulfill a contract with you. This means that even if you withdraw your consent and the processing based on the consent ceases, the personal data may remain with us for other purposes.

Right to data portability

For automated processing carried out on the basis of consent or contract where the personal data is collected directly from you, you have a right to data portability, which means that you have a right to request your personal data in a structured, commonly used and machine-readable format.

Right to rectification, erasure, or restriction

You have the right to request that your data be erased, completed, or rectified. If you believe that information about you is inaccurate or incomplete, you have the right to request that it be corrected or completed. You also have the right to request that the processing of your personal data be restricted in certain cases, for example while we rectify it.

If you wish 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 deletion request via email, we may ask for additional information to ensure that you are you. Please note, however, that if we still have a legitimate reason to save your data, for example under law or contract, your request may be rejected in whole or in part.

Right to lodge a complaint with the supervisory authority

If you think we are managing your personal data incorrectly, you have the right to lodge a complaint with the Data Protection Authority. Read more on the [website of](#) the Authority.

How do you exercise your rights?

If you have any questions about the processing of your personal data, wish to lodge a complaint or exercise any of your rights, please contact us using the contact details provided below.

dpo@skistar.com

or by letter to

SkiStar AB, Attn: DPO
Fjällvägen 25
780 91 Sälen

11 CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Policy from time to time and any changes will automatically take effect thirty (30) days after they are posted on skistar.com. If the change is particularly relevant or material, you will be notified of the change. If we update the privacy policy that are deemed necessary to fulfill obligations

under law, governmental opinion or decision, the new privacy policy may apply immediately after it is published on [skistar.com](https://www.skistar.com).