

Privacy Policy 2021-03

We protect your personal data

At SkiStar ("SkiStar", "we", "us"), your trust is important to us. Our goal with this policy is for you to feel secure and for us to describe to you in a clear and transparent manner how we collect, use, display, transmit and store your information so that you can feel confident that your personal data is stored safely and not misused.

We take action on an ongoing basis to comply with the principles of "built-in data protection" 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.

In this text, we describe how and why SkiStar processes personal data when you shop at SkiStar, on skistar.com, skistarshop.com and via our customer club "My SkiStar". The terms and conditions of our customer club, of booking and of purchase can be found on the relevant websites. SkiStar performs all processing of personal data in compliance with the EU's privacy 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. The company SkiStar AB has overall responsibility for the SkiStar Group's activities and you should therefore contact SkiStar AB if you have any questions or wish to exercise your rights.

1. What personal data we collect and why

Personal data means all kinds of information that can be directly or indirectly attributed to a living, natural person. This includes their name, national ID number, address, email address and telephone number. It may also include the likes of booking numbers and IP addresses where these can be linked to individuals.

- **Data collected in order to manage a booking**

When you book a product with SkiStar, we collect personal data from you in order to complete your booking, if your booking includes children we also collect this data for the children in question, provided that this is necessary in order to fulfil the booking or deliver good customer service. The following are potential examples of such data:

- *Identity information*, such as your name, national ID number and address.
- *Contact information*, such as your address and email address.
- *Booking information*, such as your booking number, how long you will be travelling, the destination, and what products you have ordered.

- *Information about your purchases*, including what you bought, when and where you bought it, how you paid and credit or other payment information.
- *Photographs of you*, which can only be taken in connection with you buying a season pass, in order to ensure that your ski pass is not misused.
You can also choose to upload a profile picture on My Page if you so wish.
- *Health information*, such as your height, weight and shoe size, for example in order to set up your hire skis.
- *Skiing/Boarding statistics*, if you choose to register your ski pass on My Page.

- **Data collected via personal contact**

We collect personal data when you contact us in order to manage the customer relationship between us. First and foremost, we collect the personal data necessary to be able to answer your question or handle your case.

When you call our customer services we record your call and keep the recording for 90 days, after which the conversation is anonymised and therefore can no longer be identified. When booking via telephone, the calls are recorded to ensure what SkiStar and the customer agreed on, based on SkiStar's legitimate interest. For other calls, for example pure customer service that is not associated with a booking, we obtain your consent at the beginning of the call. The purpose of recording these calls is to be able to assist you and to answer any questions you may have in connection with your booking/your call. We may also use these conversations for internal training and development purposes.

- **Information collected via My Pages**

If you register a user account on skistar.com (My Pages), we collect your email address in order to create your login. You can then manage your data via My Page.

- **Information collected when you subscribe to our newsletter**

If you choose to subscribe to our newsletter, we collect your name and email address in order to send you the newsletter. If you choose to provide it, we also collect data about your postal code and country of residence.

- **Information collected when using our digital services**

When you use any of our websites, our apps or any other digital service from us, we collect data about your use of the service in question. Some of this data may be personal data, for example your IP address if it can be linked to individuals. We also collect information about how you navigate in the relevant service, what searches you make and which products you are interested in. If you are logged into My Pages or provide information that enables us to identify you, we connect the information about your usage patterns with other information we have collected about you. For more information about the type of data collected in connection with the use of our digital services, see our cookie policy.

You can also choose to upload a profile picture on My Page.

- **Information collected from someone other than yourself**

When booking and when in contact with us in relation to various matters, it may happen that a person provides personal data about one or more other guests in a travelling group. We assume that the person providing this data has the consent of all the individuals involved to disclose this personal data. If you have not made a booking yourself, but someone else has made a booking which includes you, we collect personal data about you from that person.

When you provide personal data about other guests, you must make sure that they consent to this and that you have permission to submit the data. If appropriate, you should also make sure that they understand how their personal data may be used by us.

2. How we use and store your data

SkiStar's legal basis for processing your personal information

SkiStar processes your personal data in accordance with the law. It can happen that the same personal data is processed on the basis of multiple legal bases, such as the performance of a contract, based on a balancing of interests or specific consent from you, or on the basis that the data is necessary in order to comply with other legal obligations. This means that, even if you revoke your consent and processing based on consent ceases, it may still be necessary to save your personal data for other purposes where the personal data is still needed. Primarily, we process your data for the performance of a contract to which you are party, such as a booking.

- **Administration of your trip**

In order to be able to deliver the services and products you have ordered from us (i.e. perform our contract), we use your personal data in various ways. The data is used to produce your booking confirmation and other travel documents, to book your accommodation and make payment for the products you have ordered. Depending on what you have ordered (e.g. ski hire, ski passes, train tickets or similar), the data is used accordingly to deliver these products. Administration of your booking also includes the use of your data for the purposes of accounting, settlement and audit, credit or other payment card verification and customs controls (i.e. satisfying legal obligations).

- **In order to provide customer service**

We use your personal data in order to be able to provide you with service if you contact us with questions, comments or complaints, etc. We use your name and booking number to identify you and your booking. We use your contact information, such as your email address and telephone number, to be able to contact you in connection with questions and issues.

We do this in order to be able to fulfil our contract with you and on the basis of our legitimate interest in providing you with good service. We may also use the other personal data we have collected about you to handle your question or your case, as is relevant in the particular case

in question. When you contact us by telephone in customer service matters, which are not associated with a booking, we process your personal data with the support of your consent.

- **Sending information**

When you have made a reservation with us, we use your personal data to send you a booking confirmation, important information about your upcoming stay and offers related to your chosen product (i.e. in order to perform our contract and on the basis of our legitimate interest in marketing our products and services).

- **Marketing and personalisation**

We would love to send you relevant offers and news about our products and services. Data such as information about your previous purchases, browsing habits and search settings may be used by SkiStar in order to contact you by post, email or telephone in a marketing context. In this way, we can tailor our communications so that they are more relevant to you. We may also send you information about products and services from our partners that we believe may be of interest to you.

If you do not want to receive marketing material from us, you may decline it at any time via your settings on My Page.

- **Development of services and customer service**

We use the data we collect about our customers to develop and improve our products and services. This applies to our digital services, where we analyse user behaviour in order to develop how we present information and offers and design features.

We predominantly use anonymous or anonymised data on an aggregate level to perform this type of analysis. However, it can happen that we also use the personal data we have collected if relevant. We do this in order to fulfil our contract with you and on the basis of our legitimate interest in improving our services and our customer service.

- **Legal requirements**

Finally, your personal data may be processed in order to satisfy obligations under laws and regulations, for example regarding security and reporting.

- **Retention periods**

We never save data longer than we need to and only use your personal data for the purposes set out in this policy. After this time, we will safely remove your personal data. The same personal data may be stored in several different places for different purposes. This means that we may delete data from one system when it is no longer needed there, while the same data may continue to be stored in a different system where its purpose is still valid for that specific system. 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.

The personal data we collect via a booking is stored in our customer database for five years. If you make a new booking within five years of your return date from the trip in question, information about previous bookings/products will be saved for another five years. Personal data is stored as a basis for market and customer analyses, for statistical purposes and in order to provide you with a better booking offer and better customer service. The personal data is also stored in order to enable us to comply with the legal requirements with respect to the supervision in place for package tours and in order to ensure that there is documentation of booking in the event of a complaint. In the event of complaints, some data may be saved for ten years in order for us to be able to defend ourselves against legal claims.

If you have registered to receive our newsletter, we will retain the data necessary to administer this until or unless you unsubscribe from the newsletter or notify us that you no longer wish to receive it. You can opt out of receiving the newsletter at any time via My Page.

The data from My Page will be saved as long as you have an active profile.

In the event that a call from you to us is recorded, we will save this phone conversation for 90 days.

By law, we are required to record and retain certain information that constitutes accounting information. We therefore have to store this information for roughly seven years.

3. Disclosure of personal data

In order to be able to fulfil the booking you have made with us, 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.

- **Service providers**

In order to meet the objectives of our processing of your personal data, we share your personal data with companies that provide services to SkiStar, for example in order to manage the dispatch and delivery of your goods. 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.

- **Contractual partners and IT suppliers**

We use a number of different IT services and IT systems in our business. Personal data is stored and handled in some of these. We care about your privacy and the security of your

data during any such handling. 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 companies**

We use external providers for personalisation and analysis of user behaviour on our websites and for user feedback. These companies handle personal data on our behalf as a data processor. The data is primarily collected via cookies and is handled at an anonymous and aggregated level.

- **Agents and digital partners**

When you book a trip with SkiStar via a travel agent or website (digital partner) with which we cooperate in the marketing of our trips, it may be that you yourself provide personal data to the travel agency or website. This personal data is the responsibility of and is managed by the operator in question in accordance with its data protection policy.

When you book through an agent, you yourself provide your personal data to the agent and consent to the agent handling that data in its business. The agent can therefore identify you, e.g. with the aid of your booking number. We are not responsible for the agent's handling of the personal data you have directly provided the travel agency with.

- **Property brokers**

- Property brokers have access to the personal data needed to make a booking. This means, as appropriate, the name and age of all travellers on the booking and the telephone number of the orderer.

- **Providers of travel-related services**

In order to provide some of the services you have ordered from us, we use sub-suppliers and contractual partners. It is often necessary to provide them with personal data in order for the service in question to be performed.

- **Within SkiStar**

Our Privacy Policy applies to all group companies and subsidiaries of SkiStar. This 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 obliged by law or if the law allows, we can share personal data with the state and authorities to the extent necessary.

- **Other**

If you book other travel-related services through us, such as ski school or other activities, the personal data needed to deliver the service ordered may, where appropriate, be passed on to the party that will perform the service in question. This may involve, for example, data about the names and national ID numbers of all persons on the booking, and contact information for the person who made the booking.

- **Transfer to a third country**

Because we arrange trips in Sweden, Norway and Austria, some of our partners (e.g. accommodation and ski schools) are located within the EU/EEA. This means that personal data may be transferred to partners in these countries for the same purposes as described above.

4. Your rights

- **Necessary handling of personal data and handling based on consent**

Such processing of personal data as is necessary for us to be able to perform a contract with you or to fulfil a legal obligation is permitted without consent. However, your consent to processing is required in order for us to collect and handle your personal data for any other purpose.

- **Withdrawal of consent**

You can choose to withdraw your consent at any time by contacting us via contact details given below. If you withdraw your consent, we will anonymise the personal data we hold about you, and discontinue any processing on the basis of that consent, e.g. in connection with profiling. You can do this easily via the settings on My Page.

It may be that the same personal data is being processed both on the basis of your consent and on the basis that it is necessary or under other regulations. 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.

- **The right to information about the personal data we have stored about you**

In addition to the online access you have to the 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.

- **Right to control your personal data**

You have the right to request that data about you be deleted, supplemented or corrected. You also have the right to request that the processing of your personal data is limited to specific purposes and that it not be used, for example, for direct marketing or profiling.

You are welcome to contact us at any time in order to obtain a copy of your personal data or have it amended or deleted. N.B. Your request must be submitted in writing, as it must contain your signature.

SkiStar AB
FAO: Customer support
Fjällvägen 25
780 67 Sälen, Sweden
HERE is a template that you can use.

Cookies

On skistar.com and skistarshop.com we use cookies to improve your experience, to gather information for our marketing and to develop our websites. The data is stored anonymously. It can happen that certain personal data is handled by cookies at skistar.com. For such handling of data our cookie policy applies in addition to this privacy policy.

Contact

If you have any questions about the processing of your personal data, please contact us. Our contact details are below. If you are not satisfied with the response you have received, you have the right to submit a complaint to the Swedish Data Protection Authority. Read more on the Swedish Data Protection Authority's website

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