

# INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR SUPPLIERS AND PARTNERS OF SKISTAR (VERSION 2023:05)

#### Personal Data Controller

SkiStar AB (publ.), reg. no.: 556093-6949

780 91 Sälen, Sweden Telephone: 0280-880 50. E-mail: dpo@skistar.com

## I FOR YOU AS A SUPPLIER OR PARTNER OF SKISTAR

SkiStar carries out all processing of personal data in accordance with the EU's data protection legislation GDPR. SkiStar AB is the data controller for the processing of the personal data we collect from you. SkiStar Norge AS, corporate identity number NO 977 107 520 MVA, is part of the SkiStar Group and processes your data when you are in contact with one of our Norwegian destinations. SkiStar AB and SkiStar Norge AS thus have joint personal data responsibility for certain data we collect about you when you are in contact with a Norwegian destination, but SkiStar AB has overall responsibility for the entire group's operations and exercises a dominant influence over the group companies. SkiStar AB is your main contact and it is to us that you turn for questions and to exercise your rights. However, what is stated in this information document is applied by all companies within the SkiStar group.

## I.I Personal data that may be processed when you are a supplier or partner

SkiStar may collect and process personal data about you in our business relationship, directly with you or with your employer, and when entering into and maintaining agreements. We may process information about your private address etc. in cases where this is required to fulfil our agreement, e.g. if you run a sole proprietorship.

The categories of personal data SkiStar may process are:

- **Financial information** (e.g. payment methods, billing information, income, financial situation, tax situation, shareholding).
- Company data (e.g. company name, personal/contact information).
- **Identity data** (e.g. name, customer number, social security number (used in specific cases and printed separately), date of birth, gender, nationality).
- Comments/references/evaluation (e.g. related to the person, product, employer)
- System access rights (e.g. access rights, user information)
- Information provided by the data subject (e.g. answers to customer surveys, information in correspondence via e-mail, chat, phone)
- Information provided by the data subject in the whistleblowing service/reporting channel (The reporting person can choose to report anonymously or to come forward with his/her personal data. The data is shared with SkiStar to the extent necessary.) (Note: Applies to consultants only)

SkiStar never collects more information about you than necessary.

#### 1.2 What the personal data is used for and on what legal basis

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, and 3) the legal basis on which we use your data. If you want to read about when we delete your personal data, see section 1.4.

I) Purpose for processing the personal data	2) Types of personal data and where they come from (the source)	3) Legal basis for processing under the GDPR
Administration of accounts	<ul> <li>Data coming from you:</li> <li>Financial information</li> <li>Company data</li> <li>Identity data</li> </ul>	Legal obligations (there are laws or regulations that ensure that the personal data controllers must process certain personal data in their business)



Administer company benefits (discounts, anniversaries, etc.)	Data coming from you: Financial information Company data Identity data including social security number	Agreement (the registered person has or shall enter into a contract with the data controller)
Managing contacts of suppliers, agents and partners	<ul> <li>Data coming from you:</li> <li>Company data</li> <li>Identity data</li> <li>Data coming from someone other than you:</li> <li>SkiStar:</li> <li>System access rights</li> </ul>	Agreement (the registered person has or shall enter into a contract with the data controller)
Managing quotes, making selections and making purchases	<ul> <li>Data coming from you:</li> <li>Company data</li> <li>Identity data</li> <li>Data coming from someone other than you:</li> <li>SkiStar:</li> <li>Comments/references/evaluation</li> </ul>	Balancing of interests (the interests of the controller outweigh those of the data subject and the processing is necessary for the purpose)
Administer accounting/invoicing for incoming and outgoing payments, including the authorization procedure for invoices and card purchases	Data coming from you: Financial information Company data Identity data including social security number	Agreement (the registered person has or shall enter into a contract with the data controller)
Analysis and statistics	<ul> <li>Data coming from you:</li> <li>Financial information</li> <li>Company data</li> <li>Data coming from someone other than you:</li> <li>SkiStar:</li> <li>Comments/references/evaluation</li> </ul>	Balancing of interests (the interests of the controller outweigh those of the data subject and the processing is necessary for the purpose)
Monitor job performance and performance targets, including performance appraisals, to ensure competence requirements and development (e.g. employee appraisals)	<ul> <li>Data coming from you:         <ul> <li>Company data</li> <li>Information provided by the data subject</li> </ul> </li> <li>Data coming from someone other than you:         <ul> <li>SkiStar:</li> <li>Comments/references/evaluation</li> </ul> </li> </ul>	Balancing of interests (the interests of the controller outweigh those of the data subject and the processing is necessary for the purpose)
Receive or deliver the agreed service/product including complaints	<ul><li>Data coming from you:</li><li>Company data</li><li>Identity data</li></ul>	Agreement (the registered person has or shall enter into a contract with the data controller)
Monitor productivity and quality and resource planning including logging of vehicles, premises and equipment	<ul> <li>Data coming from you:         <ul> <li>Company data</li> <li>Identity data</li> <li>Information provided by the data subject</li> </ul> </li> <li>Data coming from someone other than you:         <ul> <li>SkiStar:</li> <li>Comments/references/evaluation</li> </ul> </li> </ul>	Balancing of interests (the interests of the controller outweigh those of the data subject and the processing is necessary for the purpose)
Publish data on intranet or website for information dissemination and service provision	<ul> <li>Data coming from you:</li> <li>Company data</li> <li>Identity data</li> <li>Data coming from someone other than you:</li> <li>SkiStar:</li> <li>Comments/references/evaluation</li> </ul>	Balancing of interests (the interests of the controller outweigh those of the data subject and the processing is necessary for the purpose)
Accounting for purchase price, compensation, deductions and taxes to public authorities	Data coming from you: Financial information Company data Identity data including social security number	Legal obligations (there are laws or regulations that ensure that the personal data controllers must process certain personal data in their business)
Inventory of materials and/or equipment	<ul> <li>Data coming from you:</li> <li>Company data</li> <li>Identity data</li> <li>Information provided by the data subject</li> </ul>	Agreement (the registered person has or shall enter into a contract with the data controller)



	Data coming from someone other than you: SkiStar: Comments/references/evaluation	
System administration and permissions (passwords, logins, key accesses, staff identification, etc.)	<ul> <li>Data coming from you:</li> <li>Company data</li> <li>Identity data</li> <li>Data coming from someone other than you:</li> <li>SkiStar:</li> <li>Comments/references/evaluation</li> <li>System access rights</li> </ul>	Agreement (the registered person has or shall enter into a contract with the data controller)
Ensuring the quality of the working environment and employee health, including environmental reporting and safety measures	Data coming from you:  Company data Identity data Data coming from someone other than you: SkiStar: Comments/references/evaluation	Legal obligations (there are laws or regulations that ensure that the personal data controllers must process certain personal data in their business)
Provide and administer the whistleblowing service and investigating any reports therein	<ul> <li>Data coming from you:</li> <li>Information provided by the data subject in the whistleblowing service/reporting channel</li> </ul>	Legal obligations (there are laws or regulations that ensure that the personal data controllers must process certain personal data in their business)
Provide statistics and other information that the group is required to report by statute or official decision	Data coming from someone other than you: SkiStar:  Comments/references/evaluation	Legal obligations (there are laws or regulations that ensure that the personal data controllers must process certain personal data in their business)

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

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

- Manage and plan the work
- Protect company employees and assets
- Contact and inform employees and business partners
- Achieve transparency towards shareholders and the public

# 1.3 Who may we share your personal data with?

Your personal data will be transferred or shared with SkiStar central accounting functions, work leaders and to a certain extent the IT function. Your personal data may also be disclosed to authorities or to system and service providers, insurance companies and auditors for specified purposes. In the event that SkiStar sells or buys operations or assets, SkiStar may also disclose your personal data to a potential seller or buyer of such activities or assets.

The whistleblowing service/reporting channel is a secure system provided by KPMG AB, a partner which operates independently of SkiStar, and is therefore completely separate from SkiStar and can receive reports around the clock. SkiStar has chosen this solution to promote reporting and to ensure that independent and autonomous persons handle incoming cases.

# 1.4 How long do we store your personal data?

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



## 1.5 Your rights

You have the right to:

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

You can contact our Data Protection Officer (contact details as above) with any questions about the handling of personal data and your rights. When requesting access to your data, you can send an email to <a href="mailto:personuppgifter@skistar.com">personuppgifter@skistar.com</a> as we have special case handling for such requests.

## 1.6 Objection to processing

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

## 1.7 Complaints

You are welcome to contact our Data Protection Officer (contact details above) if you have any complaints regarding SkiStar's processing of personal data. You also have the right to file a complaint with the Privacy Authority or any other competent supervisory authority within the EU.