



DATA PRIVACY NOTICE

This Data Privacy Notice is valid for Aletsch Arena AG.

Protecting your privacy is important to us. We respect your identity and your privacy and ensure that they are protected and that your personal data is processed in compliance with the law.

Personal data means all details and information relating to an identified or identifiable person. Besides your contact details, such as your name, telephone number and postal or e-mail address, this also includes further information that you provide to us.

We are fully committed to the responsible handling of your personal data and guarantee our compliance with the legal requirements of the Swiss Federal Act on Data Protection (FADP), the Ordinance to the Federal Act on Data Protection (OFADP), the Telecommunications Act (TCA) and other provisions of Swiss data protection law, as well as the provisions of the EU General Data Protection Regulation (EU-GDPR). In the following, we also make reference to each of the relevant legal bases in the GDPR.

In this Data Privacy Notice, we inform you concerning which of your personal data we collect and process, why we need this data and how you can object to the collection of this data.

When we refer to the processing of your personal data, we mean all the ways in which your personal data (FADP or GDPR) is handled, i.e. the storage, processing, use, erasure, etc. of the data.

This Data Privacy Notice covers not only all forms of data processing associated with the website <https://www.aletscharena.ch/en/>, but also all instances of the processing of personal data at the information centres and other points of sale of Aletsch Arena AG.

This Data Privacy Notice is an integral part of the General Terms and Conditions of Business (GTC) of Aletsch Arena AG.

Who is responsible for the data processing?

Aletsch Arena AG is responsible for the processing of your personal data.

If you have any questions or suggestions regarding data protection, you can contact our company Data Protection Officer at any time,

either by post to:

Aletsch Arena AG
Data Protection Officer
Furkastrasse 39
3983 Mörel-Filet
Switzerland

or by e-mail to:

datenschutz@aletscharena.ch

Why do we collect personal data?

We collect personal data to keep you up to date with the latest information (on products, events, etc.) and to make your stay at the Aletsch Arena holiday destination as pleasant as possible.

We know how important it is to you that your personal data be handled carefully. Data is only ever processed for specific purposes. This could be out of technical necessity or due to contractual requirements, legal provisions, legitimate interest, i.e. for justified reasons, or if you have granted your express consent. We collect, store and process personal data to the extent necessary.






What data is collected by us, for what purpose, how long and where is it stored?

In the following, we show you - for each application - what personal and user data we collect, for what purpose, how long and where we store your various data. It is equally true for all applications that no personal data is collected by Aletsch Arena AG without your active consent.

Note: The legal basis pursuant to the GDPR is addressed to guests from the EU. Guests from Switzerland are covered by the Swiss Federal Act on Data Protection (FADP), in terms of processing, Art. 12 and Art. 13 in conjunction with the principles laid down in Art. 4 ff FADP.

Visiting our web pages

When you visit the web pages of Aletsch Arena AG, data is stored on our web agency's server.







 What technical data is stored?
On our web pages, the photo gallery and the quick search-tool of the booking platform are the only places where we collect data stored on your relevant device (computer, smartphone, tablet).
 For what purpose?
<ul style="list-style-type: none"> - To identify your search habits and adapt our content accordingly - To share data (e.g. searches for accommodations, filtering of modules)
 How long will your data be stored?
The data will only be stored for as long as you keep your browser data.
 Where is the data stored?
Locally on your device (computer, smartphone, tablet)
 What is the legal basis for processing this data?
Legitimate interest of the guest (Art. 6(1)(f) GDPR)

For external websites to which there is a link from the Aletsch Arena AG website, Aletsch Arena AG assumes no liability for compliance with the data protection regulations.







For an enquiry via the contact form



The contact form on the web pages of Aletsch Arena AG allows you to contact us easily.

 What personal data is stored?
<ul style="list-style-type: none"> - First name* - Last name* - Address - Telephone - Mobile - E-mail* - Message*
Required fields are marked with (*).
 What technical data is stored?
<ul style="list-style-type: none"> - Date and time at which you contacted us - Web page from which you contacted us - IP address of the requesting device (assuming cookies are accepted) - See also "Cookies"
 For what purpose?
<ul style="list-style-type: none"> - Without this information we are unable to process your request and will therefore be unable to provide our services. - Your first and last name are required fields and enable us to address you correctly and personally.
 How long will your data be stored?
Without your consent or interaction with us, for no more than two years.
 Where is the data stored?
HubSpot, Amazon Web Services (USA) und Google Cloud Platform (Frankfurt, Germany). You will find more details on HubSpot's cloud infrastructure here .
 What is the legal basis for processing this data?
Legitimate interest of the guest (Art. 6(1)(f) GDPR)

For an enquiry via chat








The chat feature on the web pages of Aletsch Arena AG allows you to contact us easily.

 What personal data is stored?
<ul style="list-style-type: none"> - E-mail - Conversation
Required fields are marked with (*).
 What technical data is stored?
<ul style="list-style-type: none"> - Date and time of the conversation - Web page from which the conversation was held - IP address of the requesting device (assuming cookies are accepted) - See also "Cookies"
 For what purpose?
Without this information we are unable to process your request and will therefore be unable to provide our services.
 How long will your data be stored?
Without your consent or interaction with us, for no more than two years.

 Where is the data stored?
HubSpot, Amazon Web Services (USA) und Google Cloud Platform (Frankfurt, Germany). You will find more details here .
 What is the legal basis for processing this data?
Legitimate interest of the guest (Art. 6(1)(f) GDPR)

When you subscribe to our newsletter






We use the newsletter to inform you regularly by e-mail or post about exciting news, special offers etc. from the resort.

 What personal data is stored?
<ul style="list-style-type: none"> - Gender - First name - Last name - Address - Telephone/Mobile - E-mail* - Preferences - Consent statement*
Required fields are marked with (*).
 What technical data is stored?
<ul style="list-style-type: none"> - Date and time of subscription and consent statement - Web page from which the conversation was held - IP address of the requesting device (assuming cookies are accepted) - See also "Cookies"
 For what purpose?
<ul style="list-style-type: none"> - Without these details we cannot send you any newsletters. - Knowing your gender and preferences enables us to address you correctly and personally.
 How long will your data be stored?
If you consent to receiving the newsletter, your data will be stored in our marketing tool for as long as your subscription remains active. If you remain inactive for two years, your data will be erased unless you have already opted out of all subscriptions previously.
 Where is the data stored?
HubSpot, Amazon Web Services (USA) und Google Cloud Platform (Frankfurt, Germany). You will find more details on HubSpot's cloud infrastructure here .
 Where can I manage my subscription?
An unsubscribe link is included in every marketing e-mail you receive from us. You can manage your subscription on the relevant web page.
 What is the legal basis for processing this data?
Consent of the guest (Art. 6(1)(a) GDPR)

Through the registration form on aletscharena.ch, your personal data is automatically transferred to the service provider's database via a secure connection. We use the newsletter software HubSpot to send out our newsletters. If you want to unsubscribe from the newsletter, you will find an unsubscribe link at the end of every newsletter.

On opening a newsletter



Our newsletters contain a "web beacon", a pixel-sized file that is retrieved from our service provider's server when the newsletter is opened, allowing us to analyse the use of the newsletter.

 What technical data is stored?
<ul style="list-style-type: none"> - Information as to whether the newsletter was opened - Date and time the newsletter was opened - Information about articles/links clicked on - See also "Cookies"
 For what purpose?
<ul style="list-style-type: none"> - To improve our services from a technical standpoint - To enable us to identify your reading habits and adapt our content accordingly
 How long will your data be stored?
If you consent to receiving the newsletter, your data will be stored in our marketing tool for as long as your subscription remains active. If you remain inactive for two years, your data will be erased unless you have already opted out of all subscriptions previously.
 Where is the data stored?
HubSpot, Amazon Web Services (USA) und Google Cloud Platform (Frankfurt, Germany). You will find more details on HubSpot's cloud infrastructure here .
 What is the legal basis for processing this data?
Consent of the guest (Art. 6(1)(a) GDPR)




In order to prevent the deployment of the web beacon, please adjust the settings in your email program so that no HTML is displayed in your messages.

When booking via our online shop

Our online shop at shop.aletscharena.ch lets you order from a wide range of offerings, such as accommodations, adventures/experiences, event tickets and souvenirs. If such services are provided by third parties, we share your data with the relevant service providers. Since Aletsch Arena AG acts as a broker between you and the service provider for bookings or enquiries, specific data must be forwarded to the service provider in order for them to be able to fulfil the contract or prepare an offer. If the service provider independently conducts further processing of the data collected, the data privacy notice of the relevant service provider shall apply. Therefore, please consult that data privacy notice, as well. However, we will also save your data in our central database and process it there for marketing purposes, provided you have consented to this.



 What personal data is stored?
<ul style="list-style-type: none"> <li style="width: 50%;">- Gender <li style="width: 50%;">- Mobile <li style="width: 50%;">- First name* <li style="width: 50%;">- Fellow travellers** <li style="width: 50%;">- Last name* <li style="width: 50%;">- Date of birth** <li style="width: 50%;">- Address* <li style="width: 50%;">- Credit card information <li style="width: 50%;">- Language <li style="width: 50%;">- Keycard number <li style="width: 50%;">- E-mail* <li style="width: 50%;">- SwissPass number
Required fields are marked with (*). Required fields vary depending on the product.
Details marked (**) are required only for certain products.
 For what purpose?






<ul style="list-style-type: none"> - We need a telephone number in order to contact you quickly in case of questions or problems regarding your booking/enquiry/order. In addition, the service provider may contact you by phone, for example to coordinate the handover of the keys or to clarify other details. - When you book accommodation, the service provider is required by law to register you with the authorities; thus we also require information about your fellow travellers, including their dates of birth (see "For the digital reporting system"). - Your credit card information is transmitted to the payment service provider or credit card acquirer for the purpose of processing your payment but is not stored by us (see "What data do we disclose to third parties?"). We only store the method of payment that you have used to make the booking. - If you have actively subscribed to our newsletter, we take the liberty of sending you news from the destination by e-mail. You have the option of unsubscribing from the newsletter at any time (see "On opening a newsletter"). - If you order brochures, we need your address in order to send you the brochures you have ordered.
 How long will your data be stored?
<ul style="list-style-type: none"> - If you have a user account, for as long as the user account remains active. - Without a user account (booking as a guest) or interaction with us, for no more than two years. - For as long as statutory retention duties apply.
 Where is the data stored?
Alturos Destinations GmbH, Gabelsbergerstrasse 50a, 9020 Klagenfurt, Austria
 What is the legal basis for processing this data?
Consent of the guest (Art. 6(1)(a) GDPR); performance of a contract (Art. 6(1)(b) GDPR)

When booking mountain rail/cableway tickets on our online shop

In addition to the above offers, mountain rail/cableway tickets can also be purchased via our online shop at shop.aletscharena.ch. Since Aletsch Arena AG acts as a broker between you and Aletsch Bahnen AG when booking mountain rail/cableway tickets, the data necessary to facilitate contract fulfilment and technical processing must be forwarded to Aletsch Bahnen AG. If Aletsch Bahnen AG independently conducts further processing of the data collected, the data privacy notice of Aletsch Bahnen AG shall apply. Therefore, please consult that data privacy notice, as well. However, we will also save your data in our central database and process it there for marketing purposes, provided you have consented to this.

 What personal data is stored?
<ul style="list-style-type: none"> <li style="width: 50%;">- Gender <li style="width: 50%;">- Mobile <li style="width: 50%;">- First name* <li style="width: 50%;">- Date of birth <li style="width: 50%;">- Last name* <li style="width: 50%;">- Passport photo <li style="width: 50%;">- Address* <li style="width: 50%;">- Credit card information <li style="width: 50%;">- Language <li style="width: 50%;">- Keycard number <li style="width: 50%;">- E-mail* <li style="width: 50%;">- SwissPass number
Required fields are marked with (*).
 For what purpose?
<ul style="list-style-type: none"> - We need a telephone number in order to contact you quickly in case of questions or problems regarding your booking. - If you give us your keycard number / SwissPass number, you have the option of loading the mountain rail/cableway ticket directly onto your personal keycard/SwissPass. - Your date of birth will be used to check whether you have booked the correct ticket category (adults, children, etc.).

<ul style="list-style-type: none"> - Your credit card information is transmitted to the payment service provider or credit card acquirer for the purpose of processing your payment but is not stored by us (see "What data do we disclose to third parties?"). We only store the method of payment that you have used to make the booking. - If you have actively subscribed to our newsletter, we take the liberty of sending you news from the destination by e-mail. You have the option of unsubscribing from the newsletter at any time (see "On opening a newsletter").
 How long will your data be stored?
<ul style="list-style-type: none"> - If you have a user account, for as long as the user account remains active. - Without a user account (booking as a guest) or interaction with us, for no more than two years. - For as long as statutory retention duties apply.
 Where is the data stored?
Alturos Destinations GmbH, Gabelsbergerstrasse 50a, 9020 Klagenfurt, Austria
 What is the legal basis for processing this data?
Consent of the guest (Art. 6(1)(a) GDPR); performance of a contract (Art. 6(1)(b) GDPR)


Please note that, if you make a booking for any third parties, the details you have provided regarding them will be processed as indicated by you. By making the booking, you confirm that you have informed the persons whose personal data you have transmitted regarding this fact and that they agree to the nature and scope of the use of this data by Aletsch Arena AG. This applies to all bookings made on shop.aletscharena.ch or shop.aletschbahnen.ch.

When using the Aletsch Arena App





The Aletsch Arena App lets you receive daily updates, such as summer and winter sports reports, events, tour suggestions, webcams, etc. In winter, the App also offers GPS navigation for the ski area. We use the tracking tool Google Analytics to analyse user behaviour. Information on what data is collected can be found in the corresponding section "Google Analytics".

For the digital reporting system

Guests, owners and long-term tenants of chalets, holiday and second homes who stay overnight in the Aletsch Arena resort are subject to the tourist tax (SGS 935.1 – Tourism Act of 1996). The tourist tax is billed on the basis of a registration form. This means that the holder of an operating licence to host guests must have a registration form completed and must keep a control register of his guests. The electronic entry of the registration data may be performed by the guest (quick check-in) or by the accommodation provider himself.




 What personal data is stored?
<ul style="list-style-type: none"> - Check-in date* - Check-out date* - Title - First name* / ** - Last name* / ** - E-mail - Postcode* - City* - Canton - Country (country code)* - Check-in with - Date of birth* / ** - Nationality* - Type of ID - ID number
Required fields are marked with (*).
Details marked (**) are also required for fellow travellers.





 For what purpose?
<ul style="list-style-type: none"> - For the service provider to transfer the data to Aletsch Arena AG (either by the service provider itself, via a booking system of the service provider or by Aletsch Arena AG) - For recording the booking data in a central database of Aletsch Arena AG - For Aletsch Arena AG to invoice and collect the tourist taxes owed - For anonymous reporting to the Federal Statistical Office by Aletsch Arena AG. - For granting access to the police (e.g. enquiries about missing persons) - For the collection of anonymous statistics (occupancy rate, length of stay, number of arrivals, etc.) by Aletsch Arena AG
 How long will your data be stored?
We are required by law to retain the guest's registration data for at least 10 years. The data is automatically stored in the registration system and deleted after 10 years.
 Where is the data stored?
Alturos Destinations GmbH, Gabelsbergerstrasse 50a, 9020 Klagenfurt, Austria
 What is the legal basis for processing this data?
Legal obligation (Art. 6(1)(c) GDPR)

When using the digital guest card

Guests, as well as owners and long-term tenants of chalets, holiday homes and second homes who pay tourist taxes are entitled to a (digital) guest card. With the digital guest card, you can enjoy many reduced and included services. You will receive your guest card directly from your landlord via quick check-in prior to your arrival.

 What personal data is stored?		
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> <ul style="list-style-type: none"> - Check-in date* - Check-out date* - Title - First name* / ** - Last name* / ** - E-mail* </td> <td style="width: 50%; border: none;"> <ul style="list-style-type: none"> - Postcode* - City* - Canton - Country* - Date of birth* / ** - Personal password* </td> </tr> </table>	<ul style="list-style-type: none"> - Check-in date* - Check-out date* - Title - First name* / ** - Last name* / ** - E-mail* 	<ul style="list-style-type: none"> - Postcode* - City* - Canton - Country* - Date of birth* / ** - Personal password*
<ul style="list-style-type: none"> - Check-in date* - Check-out date* - Title - First name* / ** - Last name* / ** - E-mail* 	<ul style="list-style-type: none"> - Postcode* - City* - Canton - Country* - Date of birth* / ** - Personal password* 	
Required fields are marked with (*).		
Details marked (**) are also required for fellow travellers.		
 For what purpose?		
<ul style="list-style-type: none"> - To fulfil contractual obligations; - To maintain and improve customer relations; - To ensure and increase the quality of products and services; - To prepare anonymous statistics on the use of the services and to issue invoices accordingly - To detect and sanction abuses at an early stage - Aletsch Arena AG may be obligated to transmit the data to authorities or to make the data available to them. - Aletsch Arena AG reserves the right to transmit the data to the authorities to enforce legitimate interests of third parties or in the event of suspicion of a criminal offence. 		
 How long will your data be stored?		
<ul style="list-style-type: none"> - If you have a user account, for as long as the user account remains active. - For as long as statutory retention duties apply. 		



 Where is the data stored?
Alturos Destinations GmbH, Gabelsbergerstrasse 50a, 9020 Klagenfurt, Austria
 What is the legal basis for processing this data?
Consent of the guest (Art. 6(1)(a) GDPR)


Cookies

Cookies help to make your visits to our web pages easier, more pleasant and more meaningful. Cookies are information files that your web browser automatically stores on your computer's hard drive when you visit our web pages. Cookies neither damage the hard disk of your computer nor transmit your personal data to us.

Most web browsers accept cookies automatically. However, you can set your browser so that no cookies are stored on your computer or so that you get a warning when a new cookie is set. Please refer to your browser settings for more information.

Please note that if you disable cookies, you may not be able to use all features of our online services.







The cookies are made available by our marketing tool.

 What technical data is stored?
<ul style="list-style-type: none"> - Domain - User token (utk) - Initial timestamp (first visit) - Last timestamp (last visit) - Current timestamp (this visit) - Session number (increments for each subsequent session)
 For what purpose?
<ul style="list-style-type: none"> - To improve our services from a technical standpoint - To improve our offers - To enable us to identify your reading habits and adapt our content accordingly
 How long will your data be stored?
The cookie is valid for 13 months, i.e. the data is stored for a period of 13 months.
 Where is the data stored?
HubSpot, 2 nd Floor, 30 North Wall Quay, Dublin 1, Ireland
 What is the legal basis for processing this data?
Consent of the guest (Art. 6(1)(a) GDPR)

Google Analytics

We use Google Analytics, a web analysis service of Google Inc., for the purposes of demand-oriented design and the continuous optimisation of our web pages and the Aletsch Arena App. As part of this process, we create pseudonymised user profiles and use small text files (see "Cookies").

The information generated by cookies about your use of our web pages and the Aletsch Arena App is transferred to the server of our service provider, Google Analytics, where it is then stored and prepared for our use. In addition to the data listed above (see "Visiting our web pages"), this gives us the following information:

 What data is stored?
<ul style="list-style-type: none"> - Name and URL of the data requested - The referrer page from which access occurred, along with any search term used - End device (type, version, colour depth, resolution, width and height of the browser window) - The type of browser you are using, including the version - Country, region or city from which access occurred - Name of your internet provider - The transfer protocol used - Navigation path taken by a visitor on the website - Duration of the visit to the website or sub-page - Sub-page from which the visitor leaves the website - Information as to whether the visitor is returning or first-time visitor
 For what purpose?
<ul style="list-style-type: none"> - To evaluate and improve the use of the web pages and the Aletsch Arena App - This information may also be transferred to third parties where this is required by law, or where such third parties process the information on our behalf
 What technical data is stored?
Cookies (user ID, ad ID)
 How long will your data be stored?
26 months
 Where is the data stored?
Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA
 What is the legal basis for processing this data?
Consent of the guest (Art. 6(1)(a) GDPR)

The anonymised IP address transmitted from your browser by Google Analytics is not combined with other data held by Google. Only in exceptional cases will the full IP address be transmitted to a Google server in the United States and truncated there. According to Google Inc., the IP address will not under any circumstances be linked to other data pertaining to you. More information about the web analysis service we use can be found on the Google Analytics website.

You can prevent the data generated by the cookie relating to your use of the website (including your IP address) from being recorded by Google, and prevent such data from being processed by Google, by downloading and installing the browser plugin available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en-GB>

Google Tag Manager

Google Tag Manager is a solution that allows us to manage website tags via an interface and thus integrate, for instance, Google Analytics and other Google marketing services into our website. The Tag Manager itself, which implements the tags, does not process any personal data. In terms of the processing of your personal



data, we make reference to the following information about Google services: Use policy: <https://marketing-platform.google.com/intl/en-gb/about/analytics/tag-manager/use-policy/>.

Adform

Tracking points from Adform, Wildersgade 10B, 1408 Copenhagen, Denmark is integrated on our websites. This enables Aletsch Arena AG to track the activities of users after they have visited and navigated around our sites. Any data that are collected in this process remain anonymous. This means that the data of individual users cannot be accessed. Collected data are, however, stored and processed by Adform. We are providing you with information on this issue, based on the most recent information we have received ourselves. These tracking points enable Aletsch Arena AG to provide users with specially customised ads.

Our websites also use cookies and products from Adform A/S (Ad Server, DSP and DMP) for targeted advertising in compliance with GDPR Article 26. For this purpose, it records a variety of parameters (pages accessed, device type, location, recently visited websites) and groups together users under different sections. Applying statistical analyses, it then finds similar persons within the global Adform cookie pool, to whom it presents specific promotional material advertising for Aletsch Arena AG. Further details about Adform can be found [here](#).

Social media

Links to our social media profiles

Our websites and the Aletsch Arena App feature links to our social media profiles on the following social networks:

- Facebook (Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA)
- Flickr (SmugMug Inc., Suite 200, 67 E. Evelyn Ave., Mountain View, CA 94041, USA)
- Instagram (Instagram Inc., 1601 Willow Rd., Menlo Park, CA 94025, USA)
- Pinterest (Pinterest Inc., 651 Brannan St., San Francisco, CA 94103, USA)
- Twitter (Twitter Inc., 1355 Market St., Suite 900, San Francisco, CA 94103, USA)
- YouTube (YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA)

If you click on the relevant social network icons, you will automatically be taken to our profile on the relevant social network. In order to use the features of this network, you may be required to log on to your user account at the network.

When you click on a link to one of our social media profiles, a direct connection is established between your browser and the server of the applicable social network. This informs the social network that you have visited our website with your IP address and clicked on the link. If you click on a link to a social network while logged into your account with that network, the content of our site may be linked to your profile on the social network in question. This enables the social network to associate your visit to our website directly with your user account. If you want to prevent this, you should log out before clicking on such links. This association is made at any rate if you log on to the relevant network after clicking on the link.

Use of social bookmarks

Our web pages use social bookmarks that are identified by the logo of the respective service. Users of certain social media platforms can use social bookmarks to place links from selected websites on their profile to mark them or to share the page with their contacts. Clicking on social bookmarks sends identifying data to



the relevant social media platform. If you do not want this to happen, you should not activate social bookmarks. With regard to the collection or the processing and use of your data by social media platforms, please consult the data protection information on the individual social media platforms.

Use of external content

On certain websites you will find content from external providers, such as Google Maps, YouTube, Vimeo and Flickr. This means that in that area of the website an external website is accessed. How the data is processed within these iframes is beyond our control. The external providers can associate the accessing of this content with your respective account so long as you are registered with the provider in question. The providers will set a cookie as soon as the page has loaded. With regard to the collection or the processing and use of your data, please consult the data protection information of the individual providers.

Which providers are specifically involved?

- Google Maps (Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA)
- feratel Webcams (feratel media technologies AG, Maria-Theresien-Strasse 8, 6020 Innsbruck, Austria)
- Flickr (SmugMug Inc., Suite 200, 67 E. Evelyn Ave., Mountain View, CA 94041, USA)
- Outdooractive (Outdooractive GmbH & Co. KG, Missener Strasse 18, 87509 Immenstadt, Germany)
- SBB Fahrplan (Swiss federal railways SFR, Hilfikerstrasse 1, 3000 Bern 65, Switzerland)
- Skiline.cc (Alturos Destinations GmbH, Lakeside B03, 9020 Klagenfurt, Austria)
- TrustYou Bewertungen (TrustYou GmbH, Steinerstrasse 15, 81369 Munich, Germany)
- Vimeo (Vimeo, Inc., 555 West 18th Street, New York, NY 10011, USA)
- YouTube (YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA)

Analogous data collection

Aletsch Arena AG also collects personal data from you outside the website. This may be the case, for example, if you contact us by e-mail or telephone independently of the website or if we need to record your information (e.g. your e-mail address or telephone number) in order to contact you.

We also collect your personal data when you register for an event or book an adventure/experience at one of our information centres. In this case, we obtain essentially the same data as we require for bookings on the website (see "When booking via our online shop"). The consent of the guest forms the legal basis of this data processing (Art. 6(1)(a) GDPR). In the case of third-party services, our role is limited to that of brokers in that we perform bookings on behalf of the service providers. We forward to the relevant service providers the data needed for carrying out the booking. These service providers are responsible for the further processing of the data in compliance with data protection law. Unless notified otherwise, the service providers will process the data to carry out the booking. They may also engage third parties to process the data on their behalf. Hoteliers, owners of holiday apartments and camping-site operators are also required by law to register you and your fellow travellers with the authorities (see "For the digital reporting system").

In the case of third-party services, we are not responsible for the data processing performed by the service providers. We will, however, store the booking data in our central database, along with any other data that we collect from you in relation to the provision of services, and, subject to your consent, will evaluate it there for marketing purposes (see "Storing your personal data in a central database at Aletsch Arena AG"). The performance of a contract (Art. 6(1)(b) GDPR) forms the legal basis of this data processing.



Retention of data

We process personal data only as long as this is necessary for the purpose for which it was collected or as required by law. If you have set up a user account with us, we will keep the master data you provide for an unlimited period of time. However, you may request the deletion of your account at any time (see "What are your rights?"). We will delete the master data, provided we are not required by law to retain it.

Contract data, which may also include personal data, will be kept by us until the end of the 10-year statutory retention period. Obligations to preserve records arise e.g. from accounting and tax regulations, as well as the obligation to preserve electronic communications. If we no longer need this data to perform the services, the data will be blocked. This means that the data may then only be used for accounting and tax purposes.

If, due to abuse, payment defaults or other legitimate reasons, we wish to refuse further business dealings with an affected person, we will retain the relevant personal data for five years, or, in the event of a recurrence, for 10 years.

What data do we disclose to third parties?

We will only disclose your personal data with your express consent, if we are required to do so by law or if this is necessary to enforce our rights, in particular to enforce claims arising from the contractual relationship.

Various third-party service providers are explicitly mentioned in this Data Privacy Notice (see "What data is collected by us, for what purpose, how long and where is it stored?"). Another service provider to whom personal data is passed on or who has or may have access to personal data is our web hosting service, neusta destination solutions GmbH, Leopoldsstrasse 16, 80802 Munich, Germany (www.neusta-ds.de). The website is hosted on servers in Germany at neusta infrastructure Services GmbH, Konsul-Smidt-Strasse 24, 28217 Bremen, Germany, www.neusta-is.de.

Third-party providers

We rely on third-party providers to process personal data on our behalf. This can serve a variety of purposes, e.g. sending advertising content or verifying the e-mail address that you provided to us in the booking process. All third-party providers are subject to confidentiality and contract data processing agreements. This means that they are not authorised to process your personal data for any purposes other than that specified by Aletsch Arena AG.

Payment providers

When you make a credit card payment on our website, we forward your credit card information to your credit card issuer, as well as to the credit card acquirer. If you opt to pay by credit card, you will be asked to enter all the required information. With regard to the processing of your credit card information by third parties, please also read the General Terms and Conditions, the data privacy notice of Datatrans AG and that of your credit card issuer.

Skiline

You have the option of signing up directly on our website for the services of Skiline (ski day tracking, giant slalom with ski movie, speed course with photo, etc.). If you opt to use Skiline's services, you will be asked to enter all required information (keycard number, first name, last name, etc.). With regard to the processing of



your personal data by third parties, please also read the General Terms and Conditions and the Privacy Statement of Alturos Destinations GmbH.

Braze

For our marketing automation, we use the services of "Braze". Data is stored exclusively on servers located within the European Union. You can learn more about Braze at: <https://www.braze.com/legal/>

Alturos Destinations AG

The following service providers may access personal data in the course of performing contracts: providers of online shop, reporting and Skiline services: Alturos Destinations AG, Churerstrasse 54, 8808 Pfäffikon, Switzerland.

Alturos Destinations GmbH (Austria) has an agreement for contract data processing with Anexia Internetdienstleistungs GmbH, Feldkirchnerstrasse 140, 9020 Klagenfurt am Wörthersee, Austria.

Competent authorities

We disclose personal data for law enforcement where this is required by law (e.g. reporting system), absolutely necessary for preventing, detecting or prosecuting criminal acts or fraud or if we are otherwise required to do so by law. Furthermore, we may share personal data with the competent authorities to safeguard our rights and those of our service or business partners.

SwissPass

As a guest, you have the option of using the SwissPass as a carrier medium for various services (mountain rail/cableway tickets, guest card, etc.). Upon your consent to the SwissPass [Disclaimer](#), data will be exchanged between the Swiss federal railways SFR (SBB AG) and Aletsch Arena AG. Aletsch Arena AG will send information regarding the validity period, item name, date of purchase, reference number and additional information to SBB AG. Conversely, SBB AG will supply only the attributes necessary for providing the service (see "When booking mountain rail/cableway tickets on our online shop" and "When using the digital guest card"). If you consent to the SwissPass Disclaimer, you also accept the corresponding provisions of SBB AG. SBB AG will store the data for a period of up to 10 years. The retention period at Aletsch Arena AG is specified under the applicable type of data processing (see "What data is collected by us, for what purpose, how long and where is it stored?")

Storing your personal data in a central database at Aletsch Arena AG

The personal data mentioned in the preceding sections is centrally stored, processed and analysed by Aletsch Arena AG. These analyses may result in the creation of user profiles about you. By using the aforementioned features, you agree that we may store your personal data in our central database and analyse it for advertising purposes. You agree that user profiles about you may be created in the process. You can object to the analysis of your personal data for advertising purposes and to the creation of user profiles at any time (see "What are your rights?").

We use HubSpot's marketing tool for our central database. HubSpot is an integrated software solution that enables us to cover various aspects relating to our digital marketing, sales and customer relationship management. We also use the tool for analysing our web content in order to optimise it and to offer you the best possible and user-friendly service.



We use HubSpot for:

- initiating contact via our contact form (see "For an enquiry via the contact form")
- the newsletter subscription process and delivery of the newsletter (see "On opening a newsletter")
- creating landing pages that are used as part of an advertising campaign and include interaction options, such as making contact or downloading documents
- social media linking or social media sharing
- analysing the use of our web pages (e.g. access, pages visited, duration of visit, etc.), as well as for analysing the use of our newsletters, such as opening rate, click rate, subscription cancellations, etc. (see "On opening a newsletter")

For more detailed information regarding the extent of the data processing, please see the section "What data is collected by us, for what purpose, how long and where is it stored?".

The content of our web pages, as well as the personal data that you provide, for example, when using our contact form or subscribing to our newsletter, is stored on servers owned by our software partner HubSpot.

HubSpot also uses cookies that are stored on your computer and enable us to analyse your use of our website. HubSpot analyses the information collected (e.g. IP address, geographic location, type of browser, duration of visit and pages accessed) on our behalf so that we can generate reports about the visit and the pages visited and can thus improve our website. If you do not want your activity on our website to be recorded by HubSpot in general, you can opt out of it in the cookie notification message that appears the first time you visit our web pages.

All information collected by us is subject to this data privacy provision. HubSpot is certified under the terms and conditions of the "EU - U.S. Privacy Shield Frameworks" and is subject to the TRUSTe Privacy Seal and the "U.S.-Swiss Safe Harbor" framework. This means that any processing of personal data by certified enterprises outside Europe meets the European standards of data protection.

You will find more information on HubSpot's privacy policy [here](#).

For more information from HubSpot regarding the provisions of EU data protection legislation, click [here](#).

You will find more information about the cookies used by HubSpot [here](#).

 Where is the data stored?
HubSpot, 2 nd Floor, 30 North Wall Quay, Dublin 1, Ireland

Ultimately all this data serves to personalise the information and offers sent to you and to better adapt them to your interests.

What are your rights?

You have the following rights with regard to your personal data:

- The right to withdraw your consent at any time (Switzerland: general rule; EU: Art. 7(3) GDPR). If you have previously consented to the processing of your personal data, you can withdraw your consent anytime.
- The right to information about the data processed (Switzerland: Art. 8 FADP, EU: Art. 15 GDPR). You have the right to request information about whether your personal data is being processed by



the provider, as well as information about individual aspects of the processing and to obtain a copy of the data.

- The right of verification and rectification (Switzerland: Art. 15 FADP, EU: Art. 16 GDPR). You have the right to verify the accuracy of your data and to request that it be updated or rectified.
- The right to have your personal data erased or otherwise removed (Switzerland: Art. 15 FADP, EU: Art. 17 GDPR). Under certain circumstances, you have the right to request the provider to delete your data.
- The right to restrict processing (EU: Art. 18 GDPR). Under certain conditions, you have the right to restrict the processing of your data.
- The right to data portability (EU: Art. 20 GDPR). You have the right to receive your data in a structured, commonly used and machine-readable format and, where technically feasible, to have the data transmitted to another controller without hindrance.
- Right to object to the processing of your data (Switzerland: Art. 15 FADP, EU: Art. 21 GDPR). You have the right to object to the processing of your personal data if the processing occurs on any legal basis other than your consent.
- The right to take legal action (Switzerland: Art. 20 FADP) or, in the EU, the right to lodge a complaint (EU: Art. 77 GDPR).

To exercise your rights, please contact the Data Protection Officer identified at the beginning of this Data Privacy Notice.

How is data security guaranteed?

We utilise appropriate technical and organisational security measures to protect your personal data stored with us from manipulation, partial or complete loss and from unauthorised access by third parties. Our security measures are continuously being improved in line with technological developments. You should always keep your information confidential and close the browser window when you have finished communicating with us, especially if you share your computer with anyone else. We also take in-house data protection very seriously. We obligate our employees and the service providers engaged by us to observe confidentiality and to comply with the provisions of data protection legislation.

Changes to this Data Privacy Notice

We reserve the right to modify and supplement this Data Privacy Notice anytime at our sole discretion. Please consult this Data Privacy Notice regularly.

Last updated: 4. February 2021

Icons created by "Freepik" downloaded from www.flaticon.com (as of September 2018)