

# Data Privacy Policy

**Gasteiner Bergbahnen AG**  
hereinafter referred to as “GBB”



**Version dated 10 November 2021**

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## 1. Legal Scope

This Data Privacy Policy is valid for Gasteiner Bergbahnen AG.

## 2. Purpose of Data Processing

GBB processes personal data of employees, partners, customers and suppliers for the purpose of performing its business activities and fulfilment of associated legal as well as contractual requirements.

### 2.1 Collection of Customer Data

In the course of the customer procuring a ticket by means of the online form, telephone or ticket offices, in order to complete the booking and payment process we collect and process – regardless of the product in question – first name, last name, postal address, telephone number, email address, date of birth and a photograph.

### 2.2 Admission Control

For the purpose of admission control, a reference photo is taken of the lift-ticket holder upon first passing through a turnstile equipped with a camera. This reference photo is compared by lift personnel with those photos which are taken on every subsequent occasion when the holder passes through a turnstile equipped with a camera.

The reference photo is deleted immediately upon the validity of the lift ticket expiring, whilst the other photos are deleted no later than 30 minutes after the holder has passed through any turnstile.

GBB wishes to point out that there is an option to purchase lift tickets that are technically configured in such a way that no photo is taken when passing through a turnstile. In this case, however, the ticket holder should expect to be subjected to random ticket inspections conducted by lift personnel.

### 2.3 Registration at the Online Shop

Other than ordering as a “Guest”, persons using the Webshop may also establish a user account which also provides access to information about previous orders. At the same time, the stored data will automatically be applied to new orders so that the user does not have to manually enter data again.

In order to provide these services, we process the personal data which you provided in the course of registration or at a later point in time. This includes name, email address, your date of birth, your chosen personal password, and your postal address. You may delete your user account at any time, at which point we will delete all data which are not subject to statutory retention requirements.

The website [www.skigastein.com](http://www.skigastein.com) also provides access to the online shop of Ski amadé GmbH. Since this merely constitutes a link, the online shop of Ski amadé GmbH is not covered by the Data Privacy Policy at hand.

## 2.4 Photo Points

Several photo points are distributed throughout the ski areas which can be used in order to take photos. When you use a photo point, a current photograph is taken and published online. You can have the photos which are taken of you deleted at any time. To do so, simply contact us at [info@skigastein.com](mailto:info@skigastein.com).

Some of the photo points are operated by Alturos Destinations GmbH (Skiline). These are not covered by the Data Privacy Policy at hand and not subject to the responsibilities of GBB. Consequently, GBB can accept no liability for the data privacy policies of the aforementioned operator.

## 2.5 Skiline

Our website provides access to Skiline, an external service which permits users to view a record of their personal skiing data (total elevation skied etc.). In order to do so, Skiline receives data pertaining to the turnstiles you have passed through as well as your ticket number. That said, no personal data is shared with them.

When accessing Skiline services from our website, you will leave our website, whereupon we can accept no further liability.

## 2.6 Job Applicants

The contact data and application materials supplied in the course of a job application are electronically processed by us in order to select suitable candidates for employment.

In the event the candidate is rejected, the application materials are only retained for evidentiary purposes subject to the candidate's consent.

## 2.7 Website & Cookies

### 2.7.1 IP Address

When a user visits our website, information is automatically stored on our webserver. This information includes the browser which was used, the operating system, the originating page which led you to our web presence, the IP address, the time of access, and other information. From the perspective of GBB, these data are pseudonymized and cannot be attributed to specific persons absent other data sources.

GBB will not utilize these data insofar as there are no grounds to suggest illegal use of the website.

## 2.7.2 Google Analytics

This website utilizes Google Analytics, a web-analysis service provided by Google Inc. (“Google”). Google Analytics uses so-called “cookies”, text files which are stored on your computer and enable analysis of your use of the website. The information generated by the cookie about your use of this website (including your IP address) is transmitted to a Google server in the USA, where it is stored. Google will use this information in order to analyze your use of the website, compile reports about website activities, and provide further services associated with website use and use of the Internet in general. Potentially, Google may also transmit this information to third parties, insofar as this is required by law or the third party processes said data under contract with Google. Under no circumstances will Google link your IP address with other data. You may prevent the installation of cookies by changing the settings correspondingly in your browser software; However, we wish to point out that, should you choose to do so, you may not be able to avail yourself of the full functionality of this website. By using this website, you declare your consent to the processing of data collected about you by Google in the aforementioned fashion and for the aforementioned purp

## 2.7.3 Hotjar

Our website uses Hotjar to analyze user behavior and improve the user experience. We collect anonymized data, such as:

- Clicks
- Scroll movements
- Visited pages

Purpose of Data Collection  
This information helps us tailor our services to your needs. The collection and processing of data are carried out exclusively based on your consent (Art. 6(1)(a) GDPR).  
Withdrawing Your Consent  
You can withdraw your consent at any time by adjusting your cookie settings.  
Adjust Cookie Settings.  
Joint Controllers Hotjar Ltd Dragonara Business Centre, 5th Floor Dragonara Road, Paceville St Julian's STJ 3141, Malta  
Data Processing • Retention Period: Data is stored for a maximum of 395 days and then automatically deleted.  
• Storage Location: Hotjar stores this information solely on servers within the European Union.  
• Data Security: No personal data is collected or processed, as all data is fully anonymized.

## 2.7.4 Retargeting

### **Display of personalized advertising by means of “retargeting”**

This website uses so-called “retargeting tags”. A retargeting tag is a JavaScript element inserted into the source code of the website. If the user visits a page on this website which contains a retargeting tag, a provider of online advertising (e.g. Google) will place a cookie on the computer of the user and ascribe it to corresponding target groups for retargeting purposes. This cookie is subsequently used to display retargeting campaigns (i.e. interest-related advertising) on other websites. Studies have shown that interest-related advertising is more appealing to Internet users than advertising which is not directly related to the user’s personal interests and/or websites they have previously visited.

### **Settings and Deactivation Options**

Third-party providers, including Google, use these cookies in order to display advertising that reflects previous visits to our website by the user. This process does not involve storage of personal data. Users of this website may deactivate the use of cookies by Google by going to the page "Google Ad Preferences". Furthermore, users may deactivate the use of cookies by third-party providers, simply by visiting the deactivation page of the "Network Advertising Initiative" and changing the corresponding settings.

Google Ad Preferences: <http://www.google.com/ads/preferences/?hl=de>

Settings and opt-out possibilities through the "Network Advertising Initiative": [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)

## 2.8 Accommodation Referrals

The data provided in the course of submitting an accommodation request / holiday enquiry are forwarded to the accommodation provider for the purpose of brokering accommodations, whereby at no point does GBB have access to said data itself.

A complete listing of recipients may be found in the list of providers: <https://www.skigastein.com/de/unterkuenfte>

## 2.9 Newsletter

Pursuant to your consent to receiving the newsletter, we use the data which you provided, including name, email address and other contact information, in order to regularly keep you up to date with news about the ski region, the company as well as special offers.

If you no longer wish to receive the newsletter, you may unsubscribe to it at any time. To do so, simply use the "Unsubscribe" link which is contained in every email.

## 2.10 Prize Drawings

From time to time, you have the opportunity to participate in GBB prize drawings. In the course thereof, personal data including email address, name, postal address will be collected and processed in order to administer your entry.

The personal data collected within the framework of a prize drawing is used exclusively in order to conduct said drawing (including determination of the winner, notification of the winner and delivery of the prize, for example). Upon conclusion of the prize drawing, the participant's data will be deleted.

Data which have been collected from you in the course of a prize drawing will only be used for the sending of newsletters subject to your explicit consent.

## 3. Fundamental Principles for the Processing of Personal Data

The processing of personal data is based on a set of strict principles which deem the protection and security of data as well as the rights of the affected person to be of the highest order.

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## Legality & Transparency

Data is processed lawfully and in good faith. Whenever data is collected, the affected person is made aware that the data will be processed and for what purposes. At a minimum, the affected person will be informed about the following points:

- The party responsible for data processing
- The purpose of data processing
- The legal foundation upon which the data are processed

At all of our ticket windows, you will find brief information pertaining to how the data collected from you is processed.

## Specification of Purpose

The data are collected and processed for specified, unambiguous and legitimate purposes. Your data will not be processed in ways that are not consistent with said purposes.

## Data Minimization

Only such data will be collected and processed that are absolutely necessary for the declared purposes. If it is possible to achieve the declared purposes with a reasonable expenditure of effort, only anonymized data will be processed.

## Storage Limitation and Deletion

Personal data will be deleted as soon as the purpose for which they were originally collected as well as any legal retention requirements have lapsed. If, in individual cases, there are interests worthy of protection pertaining to said data, the data will be retained until the said interests have been legally resolved.

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## **Data Security**

Personal data are treated in accordance with strict data privacy laws. The data are handled confidentially and protected by means of appropriate organizational and technical measures from unauthorized access, illegal manipulation or sharing, as well as from loss or destruction.

## **Factual Accuracy**

Personal data must be kept accurate, complete and current. Appropriate measures are taken in order to correct outdated, inaccurate or incomplete data.

### **4. Data Confidentiality Obligation**

All employees of GBB are contractually obligated to maintain data confidentiality, receiving regular instruction and training with respect to the secure handling of personal as well as other critical data.

### **5. Data Security**

The protection of confidentiality, availability and integrity of data is a crucial responsibility of GBB. This applies in equal measure to company secrets, customer data, personal data and other critical information. To this end, GBB establishes and continually improves technical and organizational security measures according to state-of-the-art technology as well as internationally accepted best practices and security standards.

### **6. Data Privacy Officer**

GBB is not required to name a data privacy officer; in this regard, we reference Article 37 (1) of the EU-GDPR. Naturally, GBB is very conscious of its responsibilities in the handling of personal data and consequently implements all necessary steps and regulations in order to live up to them. GBB has committed itself to continually update, examine and improve its stipulated data privacy measures.

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## 7. Rights of Affected Persons

Every affected person whose personal data have been processed by GBB has the opportunity to invoke and assert their rights as such. In order to assert your rights as an affected person, you may contact us in writing at any time by means of email to [info@skigastein.com](mailto:info@skigastein.com).

### **Disclosure**

At any time, the affected person by demand disclosure of what personal data pertaining to them have been processed and for what purposes.

### **Correction**

Affected persons have the right to demand immediate correction of incorrect personal data pertaining to them.

### **Restriction**

Affected persons have the right to restrict the processing of personal data if the accuracy of the data in question is in dispute, if the processing thereof is illegal, if the processing of the data is no longer required, or if the affected person has objected to the processing of data.

### **Revocation**

Affected persons have the right to object to the processing of their personal data at any time.

### **Portability**

Affected persons have the right to receive any personal data which they have provided to GBB in a structured, current and machine-readable format. Furthermore, they have the right to demand the transfer of said data to another responsible party, insofar as this is technically feasible. Portability rights only apply to personal data that have been processed through automated means.



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## **Deletion – the “right to be forgotten”**

The affected person has the right to demand the immediate deletion of personal data pertaining to them if the legal foundation for the processing of said data is absent or no longer applies, the data processing is objected to, the data processing is illegal, and statutory retention requirements do not make deletion impossible. Data security is a high priority also with respect to the rights of affected persons, hence the assertion of the rights of affected persons is only possible pursuant to an unequivocal indication from the affected person. Furthermore, you always have the right to file a complaint with the data privacy oversight authorities.

## **8. Data Sharing**

Personal data is only shared on a legal basis consistent with applicable laws and in consideration of highest levels of confidentiality and data security.

In the scope of joint processing of personal data within the ticketing and entrance system, data are exchanged between all operating companies in the ski regions where the ski ticket is valid, and all partner companies that are listed on our website as well as in our info folders. This data exchange is for the purpose of joint entrance controls and the operation of an overarching ski business.

GBB avails itself of contractors who process data on its behalf. All such contractors are contractually obligated as such to comply with legally applicable data privacy regulations.

## **9. Ongoing Controls and Improvements**

GBB is committed to ongoing improvements in quality and processes. Compliance with data privacy guidelines and applicable statutes as well as the effectiveness of data privacy and data security measures are subject to ongoing evaluation and improvement in order to guarantee optimization of our data privacy practices.